

# Enhancing transboundary fisheries management in the Lower Mekong Basin

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**  
11304  
**Countries**  
Regional (Cambodia, Lao PDR, Viet Nam)  
**Project Name**  
Enhancing transboundary fisheries management in the Lower Mekong Basin  
**Agencies**  
IUCN  
**Date received by PM**  
2/6/2025  
**Review completed by PM**  
7/19/2025  
**Program Manager**  
Astrid Hillers  
**Focal Area**  
Multi Focal Area  
**Project Type**  
FSP

PIF  
CEO

Part I - General Project Information

1. a) Is the Project Information table correctly filled, including specifying adequate executing partners?

Secretariat comment at CEO Endorsement Request

(3/7/25) Yes.

(5/15/2025)

1. On the project information: Please remove the value for 'Project Sector' as this is for CCM only and the project is marked as no contribution for CCM.

(7/2/2025) Addressed.

Project Sector (CCM Only):	Mixed & Others
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Agency Response

IUCN, June 17, 2025

1. Thank you for your comment. As advised we have removed the value for Project Sector  
b) Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable?

Secretariat comment at CEO Endorsement Request(3/7/25) Yes.

Agency Response

2. Project Summary.

- a) Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected outcomes?
- b) Does the summary capture the essence of the project and is it within the max. of 250 words?

Secretariat comment at CEO Endorsement Request

(3/7/25) The summary is describing the underlying reasons for the decline of the LMB freshwater capture fisheries. It is missing to elaborate clearly that component 3 is taking fisheries as an entry point to discuss, inform and possibly contribute to revising the planning of irrigation and hydropower infrastructure which is not only obstruction fish passage to various degrees but also changes the flow regime and sediment transport and that way affecting river morphology, erosion and livelihoods in the Mekong delta. While the lessons learned cited in the project document emphasize that single sector projects have shown little traction, the ToC and summary could make the opportunity more clear to use fisheries and contribution to income and livelihoods in the LMB as an entry point for strengthening cross-sectoral dialogue and basin planning on higher technical and political levels across countries.

(5/6/2024) The revision is noted. It remains to be seen that the value if capture fisheries is high enough to influence the selection of sites for hydropower (mostly done) and irrigation. Some quantitative comparison of the value of capture fisheries versus irrigated agriculture and hydropower would be useful here and/or more appropriately in the rational section.

(7/2/2025) Thank you for the response and explanation. Agreed. and Cleared !

Agency Response

IUCN, June 17, 2025

Thank you for your comment. Kindly note that text is added on page 38 of prodoc explaining that the strategy is not to argue against hydropower solely on basis of reduced fisheries, which has historically failed. Rather, the approach is to question the value for money of hydropower given climate change and advances in technology. The argument is therefore not development vs. conservation but expensive vs. lower cost development. Simply put, countries can achieve energy security faster and cheaper through a more diversified and interconnected power mix. Grid connectivity is becoming increasingly important. According to the ADB, a regional power grid can reduce power supply by 20% to meet a given demand.

**IUCN, Apr 24, 2025**

Thank you for your comment. Kindly note that the summary has been rewritten and changes are shown in yellow highlights in the online CER template as well as in the uploaded versions of the CER. In specific, text in Summary and Component 3 have been updated to highlight fisheries as an entry point for cross sectoral integration and policy planning under Component 3.

TOC and summary have also been updated to emphasize economic benefits to fishers as argument to strengthen need for inter-sectoral coordination.

### **3. Project Description Overview**

- a) Is the project objective statement concise, clear and measurable?**
- b) Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?**
- c) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?**
- d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?**
- e) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?**

Secretariat comment at CEO Endorsement Request

(3/7/25)

1. PMC is within 5% and proportionality PMC to PMC co-finance is in the same proportion as net grant to co-finance.
2. KM: Please include mention of IW:LEARN in the project overview and include a 1 % allocation for participation in IW:LEARN (incl. e.g. attending IWCs and regional or thematic meetings as relevant; experience notes/videos; project website)
3. Gender: Please indicate that indicators will be gender disaggregated.

**(5/15/2025)**

The previous comments have been addressed. As mentioned in the last review sheet GEF policy reviews is adding comments at this point:

1. For project above \$10 million, the recommended threshold for M&E percentage is 2%. This project's is 3% - please ask the Agency to revise.

Monitoring and Evaluation (M&E) ⓘ						
M&E	Technical Assistance	Outcome Implementation of project mechanisms for the monitoring of project progress <u>Indicator:</u> Number of working M&E system	Output Project monitoring system established (incl. MTR and TE) <u>Indicator:</u> Number of quarterly and annual reports approved by IUCN	GET	327,500.00	1,460,010.00
Sub Total (\$)					10,211,226.00	53,705,800.00
Project Management Cost (PMC) ⓘ						
GET					497,950.00	2,641,300.00
Sub Total(\$)					497,950.00	2,641,300.00
Total Project Cost(\$)					10,709,176.00	56,347,100.00

(7/2/2025) Comment addressed.

## Agency Response

**IUCN, June 17, 2025**

Thank you for the comment. The M&E budget has been revised to 2%.

**IUCN, Apr 24, 2025**

1. Thank you for your comment.
2. Thank you for your comment. Kindly note that IW:LEARN is now mentioned in the project overview and the activity has been moved from M&E Component to Component 4, providing further details on activities that will be implemented (Please refer to Activity 4.1.4.3). A 1% budget allocation has been foreseen to cover the costs of the above-mentioned activities. The revisions are shown in yellow highlights in the online CER template as well as the uploaded clean version of the CER document.
3. Kindly note that the gender disaggregated indicators are now included in the project overview table.

## 4. Project Outline

### A. Project Rationale

- a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?
- b) Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the

private sector seen mainly as a stakeholder or as financier?

c) If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?

#### Secretariat comment at CEO Endorsement Request

(Please note that the comments are based on the prodoc and ER)

(3/7/25)

1. If the connection between sustaining and strengthening capture fisheries and influencing infrastructure operations and/or planning (e.g. for irrigation, hydropower and other) are key, which we understood that the project wanted to address per the PIF, then that takes not only engagement with the fisheries actors at local level but intersectoral engagement up- and downstream from these sensitive fish breeding and fisheries grounds. Have you considered to **focus on less sites** or why do you think it is essential and also feasible to engage in all six areas?

2. The extensive section on lessons learned is appreciated, yet to some degree needs to be clearer how key lessons were taken up on in project design.

3. Project intervention logic (Figure 3/pg. 15 in prodoc): Component 3 dropped the link to other sectors which deemphasizes the link to cooperation and sustainable basin management. This also does not align with the threats to the Mekong basin as described in the following sections of the prodoc (incl. threats of altered flows, sediment trapping and pollution not only on fish and fisheries but also agricultural production). Please elaborate.

4. The same pertains to the ToC/Design diagram (Figure 4 in the prodoc). There is a 'hint' of mentioning inconsistent policies and planning included in 3.4 but the text leaves it very vague. There is therefore a risk for the project to too narrowly focus on improved capture fisheries and associated livelihoods without linking this to decline to underlying threats and to inconsistent policies and strategies across sectors in basin management and planning. Transboundary dialogue facilitated and based in the existing MRC mechanisms will need to feed project findings into basin strategies of the LMB.

5. Please tighten the description of the intervention strategy which links to the ToC but is somewhat hard to piece together (across sections 3 and 4. of the prodoc). It would aid a great deal to condense the text and tighten this up. Section 4.2 is explicit in highlighting the need for cooperation among the countries but this lacks to run through the project rationale beyond the fisheries sector.

(5/6/2024)

1. Response noted. Addressed.

2. Addressed.

3. Thank you for the response and example form Laos. Addressed.

4. Addressed.

5. Agree with revisions and reads much clearer, Addressed.

Cleared.

## Agency Response

IUCN, Apr 24, 2025

1. Thank you for your comment. Please note that the 6 landscapes are the most important fisheries habitats in the LMB. The 6 landscapes scale approach has been considered to work with areas that are big enough to use the visible results/benefits to leverage discussions on cross-sectoral integration. MRC could lead a regional dialogue, but the target impacts must be cross sector discussion within each country. MRC's support to MCs in Fish passage and fisheries statistic is evidence that MRC interventions are eventually adopted by MCs gradually. That is why the project results are designed to be integrated with MRC SP 2026-2031 and then the MRC BDS 2031-2040. By embedding project results into BDS/SP, activities will be financially and technically supported by MRC beyond the life of project.

While the 6 landscapes are big, actual investment is limited to 100 fishing communities with the results scaled up across the landscapes.

2. Kindly note that 3 recommendations from GEF IEO Strategic Evaluation were incorporated into the design. The design also builds on IUCN's experience advocating for multiple economic and environmental benefits.

3. An arrow in the Fig 3 was added (accidentally omitted in the submitted version). C1 and C2 address the root causes of the fisheries decline, which undervalues fisheries leading to lower priority/consideration in economic development plans. The findings from the C1 and C2 (economic incentives) are to leverage cross sectoral discussions and coordination in policies and plans in the LMB under C3. Addressing root causes will not eliminate threats but fisheries will be considered as important sector in policy and planning in the LMB and rebut the myth that fisheries cannot recover. For example, Lao has requested construction of a fish passage under an irrigation project funded by ADB. This request came from the government and not ADB. By building the fish passage potential rice production might be reduced but for the benefits of fisheries.

4. We agree with this comment. Text has now been added in section 3.2.2 (p 29) to highlight the policy incoherent in supporting sustainable capture fisheries which lead to Policy dialogue under C3.

5. We agree with this specific comment. Section 3 (section 3 and 4 of previous version now merged) has been revised and tightened to clearly explain the intervention logic and highlight that the root causes are the undervaluing of fisheries and the lack of coordination among policy areas for sustainable fisheries management.

Intervention strategy has been tightened to link to challenges and root causes. Text also added in Section 3.7 to highlight the role of MRC in coordinating regional cooperation and provide technical and financial support to MCs after the project finishes

### **5 B. Project Description**

**5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?**

**b) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?**

**c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?**

**d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated**

baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

- e) **Other Benefits:** Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?
- f) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?
- g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?
- h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?
- i) **Gender:** Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?
- j) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?
- k) **Policy Coherence:** Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?
- l) **Transformation and/or innovation:** Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

(3/7/25)

1. The link of the Theory of Change to the identified barriers should be strengthened, including policy coherence and planning across sectors such as agriculture and hydropower to take account of the livelihoods and income derived from capture fisheries and related ecosystem services. The ToC seems to rather be fit to predetermined approaches and solutions and be very focused on improved fisheries management and weaker on the threats that derive from operation and planning of structures to benefit other sectors and their impact on fisheries. This aspect and what is listed as 'activities' of updating WEFE- nexus studies and strengthening cross-sector coherence in terms of policy and planning is inconsistently addressed across the project description and its interventions (see comments in the section above).

Please also include a narrative on the resilience of the project design to future changes and durability beyond the project timespan.

Definitions on what FCoM and EBFM is as well as the Ostrom's rules of common property resources are better left to the background and rational sections.

2. Please provide your definition of 'commodity value chains' (component 2). To our mind a value chain includes all steps from the raw/natural inputs to the consumer, but in that component this is not always clear and sometimes just refers to e.g. an added in country processing step which adds value to a product and income (such as fish processing via smoking etc.).

Component 1:

3. Please edit the text to not drift off into background (on Elenor Ostrom, the pros and cons of standard measurement tools versus Results based Management, etc.). Component outcomes, outputs and activities could be more much more concise and with that clearer explained and clearly linked to the Results Framework.

4. Component 1 leaves it open on "who" will do most activities, such as mapping, guidelines etc. For example, will the project engage and task locals to provide input to habitat and fishing grounds

etc. ? What is the institutional set-up envisioned behind activities on the ground and how is the flow of funds to local actors?

5. Please strengthen the description of the specific roles of women in the project description and mainstream the gender action plan into the project, results and budget. For example, formulations such as "women will play an active part..." are vague. How will this be achieved?

6. Please explain somewhere how the community and fisheries co-management mechanisms align with current formal or informal local governance mechanisms. Strengthening and building on accepted governance will be essential to be able to scale-up successful efforts. Same for the flow of funds.

X. The PIF indicated that IUCN as the lead in the field of advancing eDNA and the eBioatlas was supporting the use of eDNA to assess fish biodiversity in the Mekong and with that advancing the tools available to monitor aquatic biodiversity and impacts of developments (positive or negative). We strongly support to reconsider including this in the project implementation..

#### Component 2.

7. As mentioned in comment 2 above, wording as 'value chains' and 'circular economies' require a clearer definition, e.g. how are circular economies developed by buying sustainably caught fish (see bullet 2 in component 2, pg. 70 of prodoc).

8. Component 2.1. Please clarify which "value chains" (fish to market; etc.) will be targeted and how. The argument that the "most obvious" value chains "include dried/smoked fish, fish paste, ecotourism and homestays, drinking water and plastic waste recycling" is not based on a solid analysis nor is it clear HOW and by WHO these will be done. Players to address high-end ecotourism are not likely among the fishing families, nor is it clear who and how there is income from plastic recycling or providing drinking water. Same in fact for post landing processing of fish for drying/smoking: will this be done on household or semi-commercial level?

9. Component 2.2. Please explain the thinking behind committing to a feasibility study of a loan package of USD 100 million (for what?). Have there been some initial discussion with ADB?

Also, 2.2.2 mentions development banks etc. Is there any engagement with local or national agricultural banks to provide small scale loans directly to communities and fisheries organizations or individuals?

Again, there is a lot of text that belongs in the background and distracts from the description of the intervention logic, the planned interventions, and stakeholders and actors involved.

#### Component 3:

##### 10. Indicators:

i. "Drafted framework for harmonization of cross sectors to support transboundary fisheries solutions". Please be more clear on what is meant.

ii.- what does " Updated MRC Basin Development Strategy and Strategic Plan WITH TRANSFORMATIVE OUTCOMES AND LESSONS APPROVED by MRC Council" actually mean and could this be phrased in a more tangible way.

11. Component 3.1 (incl. outputs and activities): Can you please rewrite and provide clear bullet points what are the intended activities and outputs of this sub-component It is not easy to follow what is written and what are legal instruments, what are strategies to be developed, and who is to invest.



Also, will national and regional fisheries management groups (3.1.1.2) include or consult sectors from non-fisheries sectors? And is the the lack of integration of data the key hurdle?

12. Component 3.2.1: How will the updating of existing nexus studies and assessing the MRC Council Study etc. be institutionally aligned and empowered by the existing MRC institutional transboundary mechanisms and processes? Is there an intent to request a mandate for this work from MRC bodies which include all LMC countries? This seems essential if the work is to inform and be used to update the MRC's BDS and SP.

Are there specific transboundary working groups on agriculture and/or energy that need to engaged as well?

Component 4:

13. Please include an output/activity to engage with IW:LEARN within component 4 and indicate at least 1% of the GEF project to this in the budget (e.g. incl participation in two IW Conferences and IW:LEARN regional and thematic meetings as relevant; provide regular lessons learned to share with the portfolio and other stakeholders; create a project website;...). IWLEARN

14. . Please move the development of a communications strategy upfront in component 4. This will be essential to clarify the target audience for the communications and learning efforts and to identify the appropriate means and type of communication for different stakeholder groups. Same for a KM strategy.

15. There is mention of end users (who?) continuously feeding data and information into the regional MRC platform. Please include dialogue with the same actors to identify what benefit they expect to get from the platform in return? How will this improve their work, their livelihoods, or other, i.e. what is the incentive for them to feed data into the systems.

16. Please add a longer caption under figure 10 to explain what it tries to show.

17. The incremental cost analysis and project logic overall needs to strengthen the aspects of linking capture fisheries sustainability and value to the need to rethink aspects of transboundary, regional planning and management of the river system - including sediment and flow management and alterations - to include the real costs of declining capture fisheries and other ecosystem services that are under threat. Treating these as an asset and internalizing these values stronger in basin planning is an urgent need to not continue to loose aquatic biodiversity and dependent livelihoods and cultural richness associated.

**(5/6/2024)**

1. Thanks for response. Addressed.

2. - 6. Component 1 comments addressed.

**X. eDNA** - given the IUCN leadership in this and future prospects, it could indeed be instrumental to run a pilot comparing traditional sampling and eDNA as a pilot in one location. The comment that significant more funds would be needed to address this on wider scale is noted.

7. - 8. Component 2.1 comments addressed.

9. Comment on 2.2. Thank you for the explanation and the extensive revisions of the component text. Addressed.

10. - 12. Comments on component 3: Very good to see this much clearer write-up on cross-sector engagement. Addressed.

13. - 16. Comment on component 4: The component description remains very lengthy, but the comments are overall addressed.

17. Addressed especially through the revised component 3. Addressed.

(7/2/2025)

X. eDNA. The addition of this activity is very much appreciated and is an investment in the future of BD monitoring in the Mekong River. Addressed.

Cleared.

## Agency Response

**IUCN, June 17, 2025**

Thank you very much for the comment.

**X. eDNA:** an activity has been added under Activity 1.1.3.3 to test the eDNA to in determining the distribution range of the fish species and the fish communities present along the fish swimways in Mekong River. This activity will complement and update the state of art using eDNA for fish monitoring in the Mekong (Jean-Dominique Durand, 2022) and will be conducted in year 3.

**IUCN, Apr 24, 2025**

1. Thank you very much for the comment. Kindly note that C3 is now dedicated to addressing threats from dams and irrigation projects and several paragraphs under section 2 and section 3.6 to 3.8 have been added to explain MRC's experience to date pushing back on high-risk projects. MRC is ideally suited to working with MCs and development partners, especially ADB and AFD, on a regional energy planning and investment strategy that would reduce the probability of high-risk dams being selected. Recent experience with the Sekong A dam (currently suspended) suggests that MCs are increasingly aware of the negative transboundary repercussions of such projects.

When it comes to irrigation, Cambodia, Lao PDR, and Viet Nam are reducing investment in paddy. Thailand is the exception because of the powerful role that RID plays. But even RID is considering incorporating nature-based solutions in its \$2.2 billion ADB loan.

Project durability will be enhanced by integrating project results into MRC strategies.

As advised, the relevant text on FCoM and EBFM and Ostrom's rules of common property resources have been moved to the Glossary

2. Kindly note that the definition of VC has been added to the prodoc under C2: "the full lifecycle of a product or process, including material sourcing, production, and consumption." The starting point in VC development in smallholder-dominated fisheries sector is institutional formation and specifically the formation of fisher producer organizations, legally established cooperatives, and potentially SMEs. Whereas fish drying is a low value-added activity, fish smoking is high value-

added with smoked fish reaching \$40/kg at first point of sale. Several NGOs and testing production methods and markets for smoked fish. The project will build on this experience.

3. The Ostrom reference has been eliminated, and the remaining references have been eliminated from the text.

The description of outcomes and outputs have been reduced and more clearly linked with the Results Framework (see sections 3.8, pages 39-46)

4. The description of activities has been updated highlighting who does what and the role of the Focal Landscape Support Groups (FLSGs), which will be financed through the executing agencies to implement field activities. (see section 3.8.3 page 47)

5. The mechanisms that have been considered to ensure women's participation (already identified in the GAP) have been included and specified in the project description. FLSGs will ensure women's active participation in the project implementation at local level. Gender-responsive regional and national guidelines, also based on gender-inclusive baseline assessments, will be carried out. Indicators had been identified in the GAP, that has to be considered part of the project document (being one of its annexes). The project overall budget already includes the needed financial resources. Text added in section C1 and C2 and GAP indicators in the result framework)

6. Kindly note that text is now revised under Section 3.1/ Interlinkages Between Biodiversity Conservation and Fisheries Management in the Mekong. Fisheries co-management is recognized in fisheries law in all MCs. The issue with FCoM is not policy per se but weak implementation and specifically the chronic failure of the state (with exception of Thailand) to meet its commitments in helping communities protect their fishing grounds. The use of mini trust funds has been shown to be highly effective in building community capacity to more effectively engage local government.

X. A manuscript analyzing eDNA data collected by WWF in the Mekong River showed that it is not appropriate at the current time. The sequence database is inadequate, and it would require huge investment to update the database to make it viable. The results for all species from the WWF sampling were also poor, not just for non-natives. About 50% of sequences could only be identified to genera and many species of marine origin or from other SE Asia rivers were anomalously detected. eDNA sampling is also not cheap given the numbers of samples it would have to take across the basin and the seasonal frequency. If conducting under this project, it is only as formative action to see if it works and how to integrate it in the future but will require to add significant amount of funding.

7-8. The project will commission a VC assessment at the start of project that will produce SWOT analysis for each VC. The VCs cited in the prodoc already exist, albeit at a small scale. Based on the VC assessment, the project will select a few VCs to invest in.

The drinking water and plastic recycling VCs in the Tonle Sap are operational with operating costs covered by user fees. The capital costs were provided by external investment.

The issue of sharing fisheries value among VC actors will be addressed by supporting fisher organizations under C2. These organization might not be able to do all activities under fisheries VC but will be major added value activities such as processing and marketing.

9. IUCN is the lead external partner in the ADB NSFH and ADB is asking us for ideas that could be supported by the NSFH, which has an ambitious financing goal. A costed community fisheries investment plan for the Tonle Sap was presented at the second partners' meeting in March 2025.

In our experience, national development banks are extremely reluctant to lend to smallholders because they rarely have the cash flow or collateral that the banks require. That is why the GCF WASSA project focuses on equity investments in wetlands-based businesses, not debt financing.

Kindly note that text has been revised throughout the updated prodoc.

10.i Text added: The framework is as overarching policy and guidance aiming to integrate the economic and ecological value of capture fisheries and wetlands into broader development goals. One example of such national framework is Vietnam Government Resolution No. 120/NQ-CP dated November 17, 2017, on Sustainable and Climate-Resilient Development of the Mekong Delta.

10.ii Text revised to indicator: MRC BDS (2031-2040) and SP (2031-2036) integrated project outcomes and lessons and approved by MRC Council

11. Text revised to highlight the working groups include cross sectors representatives. The working groups will further support current MRC's effort to improve national assessments and synthesis of capture fisheries-related datasets and information and their incorporation into national basin development policies, plans and investments.

12. Text has been added.

There is no need to request additional mandate, which could be done under MRC framework for cooperation. Yes, the intention of the update is to inform new BDS and SP.

There are several transboundary working groups under MRC such as Environment, River Planning (agriculture, energy). The current expert group on environment management will be expanded to include members from the other groups under Component 3.1.1.2.

13. Activities to engage with IW:LEARN had been already included under the M&E Component. Now we moved them from M&E Component to the Component 4, providing further details on activities that will be implemented (See now Activity 4.1.4.3). A 1% budget allocation has been foreseen to cover the costs of the above-mentioned activities (See now ProDoc Appendix 4)

14. Output 4.2.1 was mistakenly focused only on communication. Now, we specified that we are referring to KM, too. Please, consider that the communication and KM strategy is expected to be developed during the inception phase as well as through Activity 4.2.1.1 through a participatory process. The PMU, jointly with the project stakeholders, will define the strategy, identify mechanisms and tools, based on identified targets, and define performance indicators. Activity 4.2.1.1 has been scheduled in the first three months (see ProDoc Appendix 2), while Activity 4.2.1.2 ensures that the communication and KM strategy and operational plans will be evaluated as needed, updated, through a participatory process, to guarantee adaptive management.

We decided to substitute the description of the Component 4 with a text that better briefly presents both the Outcomes, because the previous description was too much focused on the MEL platform (mainly addressed by Outcome 4.1).

15. MEL platform will provide a mechanism to connect a broad range of stakeholders and will be instrumental in driving adaptive learning and inclusive governance across countries and the region. For example, scientific and LEK data and information will be uploaded on the platform, as well be the results of the outcomes from community projects on ecotourism, value chains and fishery co-management results. Decision-makers and higher-level policymakers will also have access to this data and the information provided by activities in Components 1 and 2. We included further explanations to respond to this comment under the description of Outcome 4.1

16. No Figure 10 in Project Description Section. We suppose you referred to Figure 16, that effectively needs to be better explained.

17. See 4.1 on Incremental Costs

The urgency of including the real costs of declining capture fisheries and other ecosystem service assets that are under threat and internalizing those values into more robust transboundary, regional

planning and management of the river system cannot be overemphasized. This is considered one of the most important elements of the incremental cost analyses if the project will halt the steady loss of aquatic biodiversity and the closely connected livelihoods and cultural vibrancy in the LMB.

Expected Outcome: Stronger transboundary basin planning driven mainstreaming today's real values of the LMB's capture fisheries and biodiversity assets and internalizing these values to reverse the losses of aquatic biodiversity, dependent livelihoods and cultural vibrancy.

## **5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project**

**a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?**

**b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?**

**c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).**

Secretariat comment at CEO Endorsement Request  
(3/7/25)

The institutional arrangements are outlined on regional and national levels, including both listing seconded versus project hired positions. IUCN will NOT have an executing function.

The local institutional arrangements will be adapted to the local situation during project implementation.

1. Coordination and cooperation with ongoing projects and initiatives:

i. Please update para 6.3 of the prodoc (and corresponding in the ER) as it states that collaboration opportunities and synergies with the projects listed in Annex 17 will be worked out "in the final PPG".

ii. Annex 17 only refers to GEF funded projects. Please:

- Add relevant projects supported outside of GEF finance
- Please also add the GEF 8 Indo Malay IP Child projects in the list
- Please provide a summary of synergies with specific projects and ways of cooperating with these.

(5/6/2025)

Comments addressed.

Cleared.

Agency Response

**IUCN, Apr 24, 2025**

Kindly note that IUCN does not intend to have an execution role

1.i Thank you for your comment. Kindly note that para 6.3 has been updated accordingly

1.ii Thank you for your comment. Annex 17 has now been updated

### 5.3 Core indicators

a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)?

b) Are the project's targeted contributions to GEBs (measured through core indicators and additional listed outcome indicators) /adaptation benefits reasonable and achievable?

Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request

-(3/7/25)

1. Indicator 1: Please WDPAs IDs where applicable

2. Indicator 8: Please explain the large discrepancy between the number at PIF and endorsement stage.

**(5/6/2025) and (5/15/2025)**

1. Noted, yet please explain under core indicator 1.2 why there would not be WDPAs IDs for these protected areas or otherwise please include the missing WDPAs IDs for the listed protected areas.

2. That explains the numbers. Noted. Addressed.

(7/2/2025) WDPAs added (with Siphandone landscape to be created in the project timeline) Comments addressed. Cleared.

### Agency Response

**IUCN, June 17, 2025**

For core indicator 1.2 WDPAs IDs are now added in the text as well as in the core indicators sheet and the online CER core indicators section.

Tram Chim WDPAs ID: 303026

Stung Treng WDPAs ID: 198316.

Lower Songkhram River WDPAs ID: 2420 (*Ramsar Site n. 2420*)

**IUCN, Apr 24, 2025**

1. Kindly note that the concerned areas do not have WDPAs IDs hence not applicable.

2. Thank you for the comment. The figure in PIF was the total catch in Major Flood Zone in 2020 for the whole basin (MRC, 2024, Assessment of fisheries yield in the Lower Mekong River Basin 2020) while the figure in the CER refers to the total catch at 6 focal landscapes of all fish habitat combined

### 5.4 Risks

a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures

under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?

b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?

c) Are environmental and social risks, impacts and management measures adequately assessed and rated and consistent with requirements set out in SD/PL/03?

#### Secretariat comment at CEO Endorsement Request

(3/7/25)

Overall comment: Please note that the text for similar fields in the risk table and the ER differ for no apparent reason.

#### **Comments 1- 6 relate to the prodoc:**

1. Please note that the overall risk in the portal ER is correctly aligned with the ESS rating as moderate. The prodoc though lists the overall risk as "low/medium". Please revise in the prodoc.
2. Climate risk: Please provide an analysis of risks to the region and the project given increasing climate variability and change (incl. increased amplitude and duration...., impacts on flows based on upstream glacial melt, etc. What measures to maintain or increase resilience will the project adopt to respond to this. What is the residual risk taking account of these measures.
3. Environmental and Social risks; Please summarize risks more concisely. Please also include risk mitigation measures on social risks; e.g. risks listed include the marginalization of women and indigenous groups. Please list mitigating actions to counteract both. The stakeholder engagement strategy is listed but is this enough? How else is this addressed in the project design?
4. Macroeconomic risks - please address more distinctly. Same for mitigation measures, e.g. How is the communication officer addressing macro-economic risks?
5. Technical risks: Not discussed. This is not about IUCN and GEF guidelines, but about the sound technical design of the project. The other argument outlined is not to adhere to the project design where sometimes are sometimes needed and beneficial to adapt to local realities not foreseen at project design stage. Which is when adaptive measures should be built in.
6. Risks of policies etc to not be adopted: please also consider earlier comment under project design to e.g. be given a mandate to assess and provide recommendations to modify the basin development strategy and Strategic Plan. Same is indeed relevant on national and local levels.

Limited budget? The project should be designed within its budget which is arguably not that small.

#### **Comments 7 onwards related to the ER. The risk table in the ER is overall aligned with requirements:**

7. Climate risk section reads much better in the ER. Please provide some comments on floods, droughts, flow alterations due to CV&C in relation to the project.

(5/15/2025)

Previous comments have been addressed. As indicated before policy review is resulting in additional comments:

8. Please explain how the Overall risk rating was identified (**without** referring to any section of the document).

(7/1/2025)

That logic makes sense (incl. given that the moderate ratings are manageable in their sum total).

Cleared.

## Agency Response

**IUCN, June 17, 2025**

Thank you very much for your comment. Overall risk rating is based on rating for each risk category. Since the rating for each risk category is 'Low' or 'Moderate', the project overall risk can't be higher than 'Moderate'.

**IUCN, Apr 24, 2025**

Kindly note that we firstly drafted the risk table in the ProDoc and then tried to synthesize the text in the ER, given that we were asked to stay under a defined number of pages. This has now been rationalised

1. Thank you. The text is now amended.
2. Thank you. The text is now revised
3. Thank you. The social risks related text is now revised
4. Thank you. This has now been amended with reference to communication officer removed
5. Thank you. The text is now amended
6. Thank you. The text is now amended
7. Thank you. The climate risk section has now been revised in the CER

**5.5 For NGI Only: Is there a justification of the financial structure and of the use of financial instrument with concessionality levels?**

Secretariat comment at CEO Endorsement RequestNA

## Agency Response

**6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities**

**6.1 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?**

Secretariat comment at CEO Endorsement Request

(3/7/25)



1. Please strengthen the references and links to the IW strategy with IW focal area providing the majority of finance and is designed to strengthen transboundary cooperation and cross-sector trade-offs.

**(5/6/2025)**

1. Please strengthen and refer to the specific GEF-8 IW objective and how the project is aligned with it in section C. of the ER and the respective section in the prodoc (section 4). Addressing this in the project summary is not sufficient.

**(7/1/2025)**

Comment addressed. Cleared.

## Agency Response

**IUCN, June 17, 2025**

Thank you very much for the comment. The alignment with GEF-8 IW objective has been described both in the ProDoc (Section 4) and in the CER (Section C).

Kindly consider that the Advisor profile that was missing in Annex 14 refers to a IW Senior Advisor

**IUCN, Apr 24, 2025**

1. The link to IW strategy has been strengthened (Please refer to the Summary)

**6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors).**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes

## Agency Response

**6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e., BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes

## Agency Response

**7 D. Policy Requirements**

**7.1 Are the Policy Requirement sections completed?**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes

## Agency Response

**7.2 Is the Gender Action Plan uploaded?**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes

## Agency Response

### **7.3 Is the stakeholder engagement plan uploaded?**

Secretariat comment at CEO Endorsement Request

(3/7/25) Yes

**(5/15/2025)**

1. We note that the project conducted detailed stakeholder consultation during the project preparation and prepared well elaborate stakeholder engagement plan including local communities. Please provide information on how the project proposal was communicated in local languages and how the project allocates the budget for interpretation and translation of the related materials.

(7/1/2025) Comment addressed (incl. budget for local translation)

## Agency Response

**IUCN, June 17, 2025**

Thank you very much for the comments.

The project proposal was presented and discussed in local languages through national validation workshops (November 2024) and a regional validation workshop (December 2024).

Furthermore, for national and local stakeholders, project proposal documentation will be also disseminated through a shared folder that has not yet been set up.

When project sites are finalized and sub-projects set up, project information will be provided in local language concurrent with the stakeholder engagement process with communities. Further details of this process can be found in the ESMF Chapter 7.

Specific documentation will be disclosed in local languages during the first round of meetings with the local communities under Activity 1.1.4.1: 16 meetings with the Focal Landscape Support Groups (FLSGs) and 100 first meetings with the 100 targeted fisheries communities. A related budget line has been included in the project budget for the production of the material.

### **7.4 Have the required applicable safeguards documents been uploaded?**

Secretariat comment at CEO Endorsement Request

(3/7/25) The ESS Screening is uploaded but not signed. I am missing to find Annex 10 in the documents tab in the portal with the ESMF. Please submit in the next submission.

**(5/6/2025) AND also (5/15/2025)**

1. The ESMS Screening & Clearance Form (annex 10) does not list who filled it out and is not signed. Please address.
2. The EMSF (Annex 12) is labeled as a working draft (as of March 31, 2025). I.e.g. talks about the ESS and gender consultancies and site selection in future tense (see 6.3 as example). Please upload the final, including not guidelines on but a project specific grievance mechanism. Please note the importance to provide such for every site at local level and accessible in locality and language to local community stakeholders.
- 3- On Environmental and Social Safeguards : We note that IUCN attached the ESMS Screening and clearance Form, stakeholder engagement plan and ESMF. The project is classified as Moderate risk. The project may trigger serious economic displacement due to the project.
  - a. Please provide more detail risk assessment of loss of livelihoods and mitigation plans or plan for alternative livelihood plan acceptable for Indigenous Peoples and Local Communities.
  - b. Please also obtain FPIC from Indigenous Peoples and Local Communities (IPLCs) about management plan.
  - c. Please also obtain FPIC from IPLCs about collecting local fishery related information.
  - d. Please provide information of consultation with Indigenous Peoples groups, and local CSOs, not only local communities in all countries.
  - e. Please also make sure that consulted Indigenous Peoples groups and local CSOs are part of stakeholder engagement plan throughout project implementation including monitoring and evaluation.

(7/1/2025)

1. Signed on last page by Janie Rioux. Addressed.
2. Noted that the site selection is not final (and site specific ESMFs, including grievance mechanisms and FPIC - as relevant - will be obtained during the project as outlined in the now final ESMF). Addressed.
3. The comment and its subpoints are addressed in the agency response and specific references to the ESMF, prodoc and budget provided where and how the comments are addressed. Cleared.

## Agency Response

**IUCN, June 17, 2025**

Thank you very much for your comments.

1. The completed clearance form is included with the appropriate signature as part of the re-submission
2. Well noted ? the ESMF is no longer a working draft with the re-submission.

Site selection is not finalized and the ESMF provides details as to the subsequent processes to complete the selection and implement the necessary stakeholder screening and sub-project screening during the inception phase of the project. See in particular Chapters 5 and 7 of the ESMF but also Chapter 6 for related ESS analysis.

The GCM is included in the latest submission of the ESMF. The provision of GCM to local communities is well noted. A related budget line has been included in the project budget (see response to the point 7.3).

3. The point is acknowledged. Overall, we are confident that significant economic displacement from access restriction will be avoided. Indeed, the project is set up to deliver community livelihoods support in tandem with fisheries management and so by default is looking to counter risks of economic displacement, instead enhancing economic opportunities for local stakeholders. Please see the points below, where the avoidance of economic displacement ties closely to the provision of an Access Restriction Mitigation Process Framework and further stakeholder engagement.

a. The ESMF now includes an Access Restriction Mitigation Process Framework, which lays out the procedure to screen sub-projects, when sites and activities are known, and set up Action Plans where potential restrictions are identified. The ESS matrix (Chapter 4) carefully analyses which activities might result in access restriction. This action is carefully considered in relation to the screening of sub-projects (Chapter 5) and local stakeholder engagement (Chapter 7), and the triggering of IUCN Standard of Involuntary Displacement and Access Restriction (Chapter 6).

b. and c. This is outlined in Chapter 7 of the ESMF, with an FPIC procedure annexed to the document.

Meetings will be organized under Activity 1.1.4.1 to reach out to IPs to provide them with specific information on project proposal, ESMF and GCM and obtain the requested FPIC (a specific budget line has been included). These meetings will be scheduled before the 16 meetings that will be organized to create the FLSGs. These groups will play a key role in the project implementation and in the decision-making process. The participation of women (see Results Framework and Gender Action Plan) and IPs is expected. Thus, IPs will be informed about the opportunity to be part of the FLSGs.

Then a stakeholder engagement assessment will be carried out by the PMU.

d. Indigenous Peoples and marginalized ethnic minorities at project sites will be identified and consulted (see previous comment) as part of the FPIC process instigated at local level during the inception phase of the project. A provisional listing of potential groups to be found is given in the social context section of Chapter 2 in the ESMF, along with some provisional indicators of relevant CSOs. Consultations with relevant groups will be carefully documented and acknowledged through the subsequent ESMPs produced for sub-projects.

e. Please see Chapter 7 of the ESMF

**IUCN, Apr 24, 2025**

The signed ESMS screening questionnaire will be uploaded with the next submission

Kindly note that the ESMF is now uploaded

## **8 Annexes**

### **Annex A: Financing Tables**

**8.1 GEF Financing Table and Focal Area Elements: Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):  
STAR allocation?**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes.

Agency Response  
**Focal Area allocation?**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes

Agency Response  
**LDCF under the principle of equitable access?**

Secretariat comment at CEO Endorsement RequestNA

Agency Response  
**SCCF A (SIDS)?**

Secretariat comment at CEO Endorsement RequestNA

Agency Response  
**SCCF B (Tech Transfer, Innovation, Private Sector)?**

Secretariat comment at CEO Endorsement RequestNA

Agency Response  
**Focal Area Set Aside?**

Secretariat comment at CEO Endorsement RequestNA

Agency Response  
**8.2 Project Preparation Grant (PPG)**  
**a) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?**

Secretariat comment at CEO Endorsement Request

(3/7/25)

1. Please itemize the 'miscellaneous' into regular disbursement categories. "Miscellaneous" is not eligible under GEF rules. The amount of 30 K exceeds what can be seen as minor consumables/sundries.
2. Please break up the consultancy line of 170K into separate lines per contract/per consultant.

(5/25/2025)

While the previous comments have been addressed, GEFSEC policy review is providing comments at this time:

On the status of utilization of PPG:

1. Per guidelines, ?project startup? activities are ineligible expenditures under the Project Preparation Grants. Please request the agency to remove this item from the table or provide a more accurate description of ?Consultancy Contract for firm for preparation of CER, ProDoc and Annexes.
2. Please also remove ?Consultancy costs? from the table as this line is empty.

(7/1/2025) Comments 1 and 2 have been addressed. **Cleared.**

## ANNEX D: STATUS OF UTILIZATION OF PROJECT PREPARATION GRANT (PPG)

Provide detailed funding amount of the PPG activities financing status in the table below:

Project Preparation Activities Implemented	GET/LDCF/SCCF Amount (\$)		
	Budgeted Amount	Amount Spent To date	Amount Committed
Consultancy contract for firm for preparation of CER, ProDoc and annexes	170,000.00	69,333.00	100,667.00
Inception workshop, technical design workshop, validation workshop and other consultation workshop costs Workshop costs related to supporting costs of stakeholders	100,000.00	65,518.00	34,482.00
Costs related to organising project startup workshop	30,000.00	0.00	30,000.00
Consultancy costs			
Total	300,000.00	134,851.00	165,149.00

### Agency Response

**IUCN, June 17, 2025**

Thank you very much for your comments.

1. Kindly note that the project startup has replaced with ?Preparatory costs of inception workshop? which are eligible expenditures.

2. As advised we have now removed the consultancy costs line.

**IUCN, Apr 24, 2025**

1. Kindly note that now miscellaneous is replaced with project start up workshop related expenses

2. Kindly note that there is no breakdown as the entire budget is for one consultancy firm and not individual consultants. Hence, it cannot be broken down further.

### 8.3 Source of Funds

**Does the sources of funds table match with the amounts in the OFP's LOE?**

**Note: the table only captures sources of funds from the country's STAR allocation**

Secretariat comment at CEO Endorsement Requestyes

Agency Response

**8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?**

**e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?**

Secretariat comment at CEO Endorsement Request

(3/7/25)

1. Please link the letters of co-finance to the respective line in the co-finance table to facilitate review.

**(5/6/2025) and (5/15/2025)**

1. Please upload the remaining letters of co-finance for the Mekong River Commission (see also 4. below), UNEP and ICEM. Please upload them in the co-financing table.

2. Please list the countries covered under the IUCN WASSA grant. **If** these are beyond the four LMB countries, please reduce the amount counted as co-finance for this project accordingly.

3. Please spell out ICEM

4. Please upload a reference to (or another copy of) the Mekong Fund co-finance letter under the line for the Mekong River Commission as both the Mekong Fund and the MRC recurring expenditures are in fact covered by one letter of co-finance.

5. Please revise the source of Co-financing for UNEP to ?donor agency?. UNEP is not an implementing agency for this project.

(7/1/2025)

1. New letters are noted as well as the combined letter for two means of co-finance by MRC. Please note that there is one letter still missing (for the Mekong EbA South Adaptation Fund). **Please upload this.**

2. Noted that this was already scaled to only count for LMC country funds. Addressed.

3. Noted. Addressed.

4. Noted. Addressed.

5. Addressed.

Agency Response

**IUCN, 18 July 2025**

1. Thank you for acknowledging the cofinancing letters including the combined letter from the MRC. We apologise for not attaching the Mekong EbA South Adaptation Fund cofinancing letter which is now uploaded in the relevant section of the online CER.

#### **IUCN, 17 June 2025**

Thank you very much for your comments.

1. Mekong Fund is managed by MRC so both expenditures are under single MRC letter. There are now three other letters uploaded replacing the cofinancing from UNEP and ICEM.

2. The WASSA project includes the same four Mekong countries and Bangladesh with GCF financing budget being USD118mn. The cofinancing amount shown is quite a reasonable amount and not an inflated amount including the Bangladesh budget.

3. International Centre for Environmental Management is no longer a cofinancier (no more among the Co-financers)

4. Mekong Fund is managed by MRC so both expenditures are under single MRC letter.

5. This has been replaced with the new cofinancing from IUCN for this project

#### **IUCN, Apr 24, 2025**

1. Thank you for the comment. Kindly note that co-financing amount has been updated and cofinancing letters for three of the five cofinancers are uploaded. We are currently working on obtaining the remaining two cofinancing letters

##### **Annex B: Endorsements**

**8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:**

**Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes

##### **Agency Response**

**b) Are the OFP endorsement letters uploaded to the GEF Portal (compiled as a single document, if applicable)?**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes

##### **Agency Response**

**c) Do the letters follow the correct format and are the endorsed amounts consistent with the amounts included in the Portal?**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes

##### **Agency Response**



#### **Annex C: Project Results Framework**

**8.6 a) Have the GEF core indicators been included?**

**b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of total project financing (too high? Too low?)**

**c) Are all relevant indicators sex disaggregated?**

**d) Is the Project Results Framework included in the Project Document pasted in the Template?**

#### Secretariat comment at CEO Endorsement Request

(3/7/25)

1. Please add the GEF core indicators and targets.
2. Please integrate the main gender indicators and targets from the GAP into the overall results framework. This will assure that the GAP is implemented, reported on and properly budgeted. Also, please overall provide sex disaggregated indicators and targets where applicable.
3. Distribution of Fisheries Management Guidelines (1.1.2) - please consider that paper or digital copies may not be the only or the best communication method to reach small scale local fishing communities.
4. Output 1.1.3 should have a baseline value.
5. Indicator 2.1 a - could one add the tracking of household income in addition to a 'well-being' self rating.
6. Indicator 2.1 b - 20 % increase of annual income of "who?" Again, as per an earlier comment, the term "value chain" is confusing here as a value chain involves multiple actors from resource to processing to marketing and use of the derived product.
7. Indicator 2.1.1. - as above the phrasing of "communities with new or improved value chains" is unclear.
8. Component 3 Indicators need to express not only national consistency of policies and planning across sectors to consider the value of capture fisheries and ecosystems services, but also address this in a transboundary context.
9. Please provide indicators related to active participation in IW:LEARN.

(5/6/2025)

1. Noted - addressed in the ER. Please also do/duplicate in the prodoc to assure tracking and reporting in the MTR and TE.
2. Noted/addressed.
3. Noted and addressed in the project description. Cleared.
4. Addressed.
5. Addressed
6. Addressed.
7. Addressed.

8. addressed

**9. IW:LEARN:** see **GEF Core Sub-Indicator 7.4 - please include a rating to Midterm and End-of project for active participation in IW:LEARN (also: e.g. typical end of project indicators are: participation in 2 IW:LEARN conferences/IWCs; Delivery of at least 2 project experience notes; project website incorporates IW:LEARN functionalities).** Please include.

(7/1/2025) Addressed.

#### Agency Response

**IUCN, June 17, 2025**

Thank you very much for your comments.

1. Core Indicators were already included in the M&E workplan of the ProDoc. Now, they have been added to the Results Framework of the ProDoc

9.As advised we have now incorporated ratings for both term of Midterm and End-of project under GEF Core Sub-Indicator 7.4

**IUCN, Apr 24, 2025**

1. Kindly note that the GEF core indicators and targets are now added.

2. Kindly note that main gender indicators and targets have been included in the overall results framework. Anyway, we consider GAP part of the overall budget design, and the cost of the related measures already included in the overall budget

3. The Results Framework doesn't consider more than one indicator per output. So, we decided to maintain the indicator that we had identified in the master report submitted to the GEF, but we considered in the project description (see Output 1.1.2) a second distribution mechanism ([presentation to small scale local fishing communities through meetings](#))

4. Baseline value = 0 (See Results Framework)

5. We agree with this comment and text is now revised accordingly (See Results Framework)

6. Text added. The increase income will be fishing household (See Results Framework)

7. Text added. Number of fishing communities (e.g., FCoM communities) that benefit from new or improved VCs (See Results Framework)

8. Yes, text has been revised (See Results Framework)

9. Thank you and this is now revised (See Results Framework)

**Annex E: Project map and coordinates**

**8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?**

Secretariat comment at CEO Endorsement Request(3/7/25) Yes

#### Agency Response

**Annex G: GEF Budget template**

**8.8 a) Is the GEF budget template attached and appropriately filled out incl. items such as the**

executing partner for each budget line?

b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?

c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?

Secretariat comment at CEO Endorsement Request

(3/7/25)

1. Please provide separate budget lines for each staff or main technical consultants. Please relate these to the TORs and - where applicable - show transparently what positions/consultant times are allocated to each component and which to PMC. The TORs (or the budget line for each position) has to be structured to make it possible to deduct the monthly or yearly salary from this in order to compare with similar positions in the region.
2. Why is there a need for a project manager and a chief technical advisor? Please aim to combine the positions.
3. Please show in the TORs which percentage of tasks are for "project management" or "coordination" which has to be charged to PMC.
4. The project finance and admin assistant should be charged entirely to PMC (and as the other positions be shown as one distinct budget line).
5. USD 1.48 million are dedicated to revolving and seed funds (components 1 and 2) but the project document does not provide detail on the mechanism for managing and allocating these funds. Please point to an annex with at least a concept on the governance and allocation of these funds.
6. No funds should be spend via these mechanisms with MRC and IUCN reviewing and approving the financial and governance arrangements of such funds. Please include this provision at the appropriate sub-component in the prodoc and include the development and approval of these mechanisms as indicators in the Results Framework.
7. Please provide an annex explaining how trainings, workshops and meetings are adding up to over USD 3 million.
8. Please provide relate the contractual service (international and national consultants, firms) to deliverables of the project. What is provided is not allowing any way to related contracts to outcomes and outputs.

(5/6/2025) and (5/15/25)

1. (i) This has to be shown and comments addressed in **Annex G of the endorsement request**. **The GEF budget template** has been standardized to allow consistent reviews across 18 GEF agencies. Please therefore follow this format and e.g. provide separate budget lines for each key project staff/core project consultant. This then also allows clear tracking of staff and/or percentage of staff time charged to components, PMC, and M&E.  
  
(ii) please also add a column indicating the budget holder (i.e. executing agency) for each and every budget line (based on the annexed procurement plan this would be MRC).
2. Noted that the Senior Advisory (former CTA) is only budgeted as part-time (alas 8 months per year). No TORs are expanded on and describing the need for his/her position in the Annex 14 (see pg. 6)

3. and 4. Please confirm that the Project Manager and Project Finance and Administrative Assistant are then 100% charged to PMC.

5. Response noted, but please include an annex outlining the management and responsibilities for these funds for the current project as requested (this can be based on IUCN experience in the Cambodia project)

6. Noted. How will IUCN and/or MRC assure that these funds are aligned with min. IUCN fiduciary standards? USD 1.48 is not a trivial amount of money.

7. Noted that these are budget figures, yet the costs seem extraordinary high. **Yearly work plans to be approved by the PSC should seriously scrutinize where e.g. technical and knowledge exchange meetings can be combined. Please review again and see if some of such synergies can be identified already now/at endorsement stage.**

8. Noted - note thought that there are large lumpsums for many items. No procurement threshold information is provided and such amounts (hundreds of thousands) require RFPs. Please confirm that MRC's procurement procedures have been reviewed by IUCN and conform with IUCN procedures.

9. On the budget: the budget table is missing the columns for ?Detailed Description? and ?Responsible Entity?. We kindly suggest the agency to use the template provided in the Guidelines on the Project Cycle and remove the output columns so that there is more margin for the details on the activities implemented. Additionally, please present the detailed description per item in individual rows (i.e. Salary and Staff costs should be presented per each position listed in the provided TORs, Operating costs, consultants, contractual services, etc.), so one can assess the reasonability of each activity / position being charged to the project components, M&E and PMC.

**Please note: We will review the budget table again upon resubmission and provide comments as appropriate.**

**(7/1/2025)**

1. (i) and (ii) Comments addressed.

2. IW Senior Advisor part-time TORS are provided (Annex 15) and details/justification provided. His engagement is for 6 month per year starting in year 3 (at a rate of USD 4500/month = 225.-/day assuming 20 working days per month). Addressed.

3. and 4. Addressed.

5. and 6. Agency responses are noted. Annex 21 is outlining experience and the basic mechanism and experience in Cambodia which will be replicated in the project. Addressed.

7. The agency response is noted. Local consultations, trainings and meetings across the four countries and in the six sites with also different language needs is adding effort and hence costs. Please include reporting on this in PIRs and a **specific review of the adequate budgeting for this in the projects MTR**. Addressed.

8. Agency response noted. Also MRC has a long track record in managing WB, GIZ, and other funds providing confidence of their procurement procedures adhering to international standards. Addressed.

9. Addressed.

**10. As noted in the last comments, the revised budget was reviewed again. Please respond to the following comments on the budget:**

(i) Four national coordinators and M&E officers have been charged across components for a total of \$480,000. While reviewing the TORs for these positions we noticed that the responsibilities are mainly related to M&E. If this is the case the positions should be charged entirely to the M&E budget.

Expenditure Category	Detailed description	Component (USD eq.)										Total (USD eq.)	Responsible Entity ( <a href="#">Executing Entity receiving funds from the GEF Agency</a> )(1)
		Component 1	Component 2		Component 3		Component 4		Sub-Total	M&E	PM C		
		Outcome 1.1	Outcome 2.1	Outcome 2.2	Outcome 3.1	Outcome 3.2	Outcome 4.1	Outcome 4.2					
	(4) National coordinators and M&E officers	80,000	40,000	40,000	40,000	40,000	100,000	100,000	440,000	40,000		480,000	MRC

2. Please include TORs for the M&E Regional Officer as this position is also charged to the M&E budget and to component 4.

M&E Regional Officer	0	0	0	0	0	90,000	0	20,000	45,000	135,000	MRC
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(7/19/2025)

1.-9. addressed previously.

**10.**

i. The revised TORs and budget for these position is noted. Thank you for the clear references to the revisions in the prodoc and annexes.

ii. Noted and sorry for previously overlooking that TOR.

Comments have been addressed. Cleared.

Agency Response

**IUCN July 18, 2025**

Thank you very much for your follow up comments on the budget.

(i) We apologise for the error that these positions are not project management related positions but national technical specialists, external consultants supporting leading on implementation of

each of the components based in each of the four countries. Please note that the terms of reference for these specialists are included and reflected in track changes mode as well as highlighted in yellow in the updated 'Agency Project Document\_Appendix 15\_TORs of Key Project Personnel' document.

In addition, corresponding changes have been made to the following documents which have been updated and uploaded in the Roadmap section of the online CER: a) Agency Project Document 'Revisions on page 110 reflected in track changes mode and highlighted in yellow colour; b) Agency Project Document Appendix 4 'The revised rows are highlighted in light green colour; c) Agency Project Document Appendix 5 'The revised row is highlighted in light green colour; d) CER Annex G 'The revised row is highlighted in light green colour.

ii) If we may kindly clarify that the TORs were already included in the document, 'Agency Project Document\_Appendix 15\_TORs of Key Project Personnel'. Kindly note that in the updated uploaded version of this document the relevant TOR is shaded in blue font colour.

### **IUCN, June 17, 2025**

Thank you very much for your comments.

1 (i) (ii) We had already provided the requested table as Appendix 5 of the ProDoc, but it is now reflected correctly in the CER attachment with activity related costing provided.

2. It was missed out accidentally in the submission. Kindly note that the ToRs for all positions have now been updated.

3 and 4. We confirm that the costs of the Project Manager and Project Finance and Administrative Assistance are now 100% charged to PMC

5. Kindly note that the Annex 21 to the ProDoc is now uploaded with the requested information

6. Fund managements including mini trust fund, rotating fund and other financial support will be explored during the inception phase based on experiences of IUCN and MRC. 100% of funding will be managed by local beneficiaries including 100 fisheries co-management communities, 18 communities for value chain and other 16 for food systems. The funding is all grant related and not in the form of equity or loan financing which are fiduciary standards for which IUCN is not accredited with the GEF.

7. In this project IUCN and MRC decided to invest more in meetings and trainings with local authorities and communities in the six focal landscapes (44%). In any case some types of activities have to be developed at national (30%) and regional level (27%), considering the need for national and regional dialogue spaces to develop national policies and legal instruments and strengthen cross sector transboundary collaboration and coordination. We got through reducing a little bit the amount of the budget targeting local communities, without affecting significantly the effectiveness of the project development, but we think that the overall budget dedicated to meetings, workshops and trainings is justified for this multi-country project. In any case, as you suggested, the PSC will analyse the opportunity to combine meetings to manage costs.

8. IUCN has reviewed MRC procurement procedures as part of the due diligence assessment process.

- Any expense more than \$500 need 3 quotations including meeting package and travel.
- All works and services to be processed needed to be approved in annual work plan and go through published bidding process.

9. Please see response to comment 1

**IUCN, Apr 24, 2025**

*1. Please provide separate budget lines for each staff or main technical consultants*

This has already been revised. Please see ProDoc Appendix 5 ?Procurement Plan?

*Please relate these to the TORs and - where applicable - show transparently what positions/consultant times are allocated to each component and which to PMC. The TORs (or the budget line for each position) has to be structured to make it possible to deduct the monthly or yearly salary from this in order to compare with similar positions in the region.*

Following your suggestion, we specified the time allocated for each consultant for each component and as total of all components and PMC in the following documents:

- ? ProDoc Appendix 4 ?Detailed project budget?
- ? ProDoc Appendix 5 ?Procurement Plan?
- ? ProDoc Appendix 15 ?ToR of Key Project Personnel?

2. The ?chief technical advisor? has been removed, while a ?senior advisor? (IW expert) (see amended ProDoc Appendix 15 ?ToR of Key Project Personnel?)

3. A percentage of tasks for "project management? or "technical coordination? has been specified in the budget (ProDoc Appendix 4 ?Detailed project budget?) and in the ToR (ProDoc Appendix 15 ?ToR of Key Project Personnel) for the following experts:

- ESS and gender specialist (PM and Technical coordination)
- Sustainable finance and biodiversity specialist (PM and Technical coordination)
- KM and communication specialist (PM)

The related budget has been included in the PMC.

4. Thank you for the comment and this is now revised accordingly. See ProDoc Appendix 4 ?Detailed project budget?, ProDoc Appendix 5 ?Procurement Plan?

5. IUCN has recently assessed how sustainable financing using mini trust funds has strengthened community fisheries in Cambodia. The impact has been strongly positive. These mini trust funds have been established using the same term rules and regulations. In Cambodia, the income is managed by an elected sub-committee of the community fisheries community. See: <https://iucn.org/story/202412/sustainable-financing-community-fisheries-cambodia>

6. The mechanism will be worked out between MRC and National Executing partners during the inception phase. Kindly note that IUCN as GEF Agency does not interfere with processes or mechanisms that are related to inter-governmental organisations or sovereign governments that are executing agencies. Hence, IUCN will not be involved as GEF Agency in reviewing and approving financial and governance arrangements of funds.

7. This has already revised. Please refer to ProDoc Appendix 4 ?Detailed project budget? and ProDoc Appendix 5 ?Procurement Plan?. All trainings, workshops and meetings are separately identified, as well their related costs showed.

8. This has already been revised. Please refer to ProDoc Appendix 5 ?Procurement Plan?.

**Annex H: NGI Relevant Annexes**

**8.9 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.**

**b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.**

**c) Is the Agency eligible to administer concessional finance? If not, please provide comments.**

Secretariat comment at CEO Endorsement RequestNA

Agency Response

**Additional Annexes**

**9. GEFSEC DECISION**

**9.1.GEFSEC Recommendation**

**Is the project recommended for approval**

Secretariat comment at CEO Endorsement Request

(3/7/25) The project cannot yet be recommended for approval and requires e.g. a clearer description of components, better outline the institutional set-up to deliver the activities on the ground and a clearer relation to distinct budget lines.

Additional comments may come up after reviewing the resubmission from technical side. Please also note that no policy review has been included in this first round of comments yet aside from the technical reviewer including quite a number of policy review points. A comprehensive review will be done in the next resubmission.

Please also note that STAP comments are not fully addressed re. project objective, and comments 4. and 5. Please address these explicitly. Thank you.

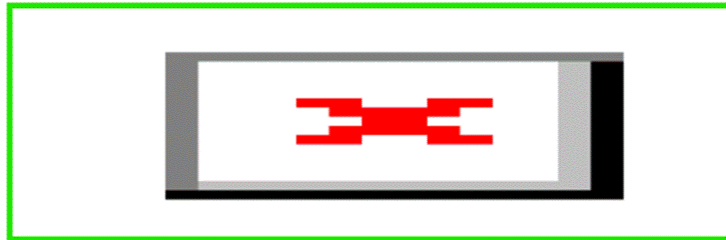
**(5/6/2025) and (5/15/2025) Please address the comments provided for both of these two dates and resubmit. Please also note one additional comment right below (as there is no field in the review sheet to address pdf formatting issues):**

1. Some figures in the CEO Endorsement Request Portal view (which is the document web posted once the project is approved ? see attached file) are not showing up in the document. Please amend.



the Asian Development Bank's (ADB) Nature-based Solution Finance Hub (NSFH) will be established. NSFH aims to lend \$5 billion by 2030 for nature-based solutions and will support improved cost-benefit analyses that highlight the economic value of healthy ecosystems. This will help incentivize public investment in sustainable fisheries management. By combining grant financing with economic valuation methodologies, NSFH will create opportunities for increased public and private investment in LMB's fisheries and ecosystem conservation efforts.

**Outcome  
2.1.  
Fisheries  
and non-  
fisheries  
VCs  
improved**



The goal of  
Outcome

2.1 is to increase the value of fish and other aquatic animal (OAA) catch by developing and improving fisheries and non-fisheries value chains (VCs). These include processed fish products such as dried and smoked fish, as well as ecotourism-based activities like birdwatching, village homestays, clean water supply, and plastic recycling. Strengthening VCs will enhance fishers' incomes while reducing their reliance on fishing as a primary livelihood, allowing future generations to pursue alternative careers and alleviating pressure on fish

***Just for a reminder: Please keep aware of the endorsement deadline (cancellation by August 9, 2025 if not endorsed)***

***(7/1/2025)*** Please address the remaining comment/s and resubmit.

*Note: Please check the pdf version of the resubmission again and assure that all figures load as intended.*

***(7/19/2025)*** Comments have been addressed and the project is recommended for endorsement.

***(7/28/2025)*** The agency has addressed all comments. However, the new ProDoc only mentions the Appendices, but these are not included in the same document. Considering that the ProDoc is the document that will be posted after Endorsement, for transparency purposes, all the information must be contained in the document. Please, therefore, merge the annexes and the prodoc into one continuous file. Please make sure to double check the PDF version of the document created in the portal to assure that all figures and tables appear and are readable. Thank you.

***(7/31/2025)*** The agency has addressed all comments at the previous submission. The IUCN prodoc with annexes merged into the same file has now been uploaded to the Portal. The Mekong River Commission (MRC) requested (see email in the Portal) to not upload financial annexes (annex 4, 5, 6 - budgets and procurement plan) to the external website as they consider these as sensitive and internal to GEF, IUCN and executing agencies. These three annexes are therefore uploaded in the portal as separate file.

The project is technically cleared and recommended for endorsement.

## **9.2 Additional Comments to be considered by the Agency during the inception and implementation phase**

Secretariat comment at CEO Endorsement Request1. Please report on efforts to combine - where adequate and possible - technical and knowledge exchange meetings to seek synergies and reduce costs for currently large budget figures on meetings etc. in PIRs and include specific attention and review of the adequate budgeting for this in the project's MTR. A

### 9.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	3/10/2025	4/24/2025
Additional Review (as necessary)	5/7/2025	6/17/2025
Additional Review (as necessary)	7/2/2025	7/18/2025
Additional Review (as necessary)	7/19/2025	7/30/2025
Additional Review (as necessary)	7/28/2025	7/31/2025