Conservation and sustainable use of biodiversity: Strengthening network of protected areas through advanced governance and management

Basic Information

GEF ID
10113

Countries
Azerbaijan

Project Title
Conservation and sustainable use of biodiversity: Strengthening network of protected areas through advanced governance and management

GEF Agency(ies)
FAO

Agency ID

GEF Focal Area(s)
Biodiversity

Program Manager
Sarah Wyatt
PIF

art I – Project Informatic

Focal area elements

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

Secretariat Comment at PIF/Work Program Inclusion
4/8/2019

Yes, this project is overall aligned with the strategy of improving protected area system management and mainstreaming.

10/16/2018

Overall, yes the project is aligned. However, the justification for the choice of protected areas is lacking. All the PAs are listed as being "biodiversity hotspots" yet this term is not defined. All these PAs are KBAs, which is where the GEF would like to focus efforts on, please include this and use the datasheets to help inform the project.

Agency Response
no response needed

Indicative project/program description summary

2. Are the components in Table B and as described in the PIF sound, appropriate, and sufficiently clear to achieve the project/program objectives and the core indicators?
Secretariat Comment at PIF/Work Program Inclusion
4/25/2019

Yes. Thank you for the clarifications and edits. The communications strategy sounds interesting, please consider documenting and sharing any lessons learned from those activities.

At CEO Endorsement please provide more details on the following:

Component 1:
- Ensure sustainability plans for all tools are developed with clear responsibilities for maintenance.

4/8/2019

No, while this project is much improved there are still issues that remain.

Component 1:
- 1.1.2 - Tool development – Who will manage the tools during and after the project to ensure continued updates and usage after the project? How will the project make sure these tools are actually taken up by relevant ministries?
- 1.1.2 – Financial incentives – This description seems too brief for what it is trying to do, which is potentially quite large and important for the long term sustainability of the project outcomes. Is this limited to creating the policy and regulatory frameworks for such arrangements? Or for actually establishing them? Either way, it would be good to have more attention given to these activities in the logframe.
- 1.1.3 – Will actual land use plans be an output or just training? Or is this linked to other outputs?

Component 2:
- 2.1.2 – This system has the potential to be an overly complicated technical and bureaucratic solution to a problem that won't actually be used in the long run. How will the project avoid this?
- 2.1.2 – Sustainable finance plan – Will the project do anything to actually set up the implementation of these ideas or just develop a plan? STAP has criticized GEF projects for often having promises of sustainable financing activities (such as PES) that fail to materialize. How will you avoid this?
Component 3

3.1.1 – Do the necessary legal and regulatory frameworks exist for co-management or will that be a part of component 1?

Minor:
- Please correct the word co-opted on page 19 as it has a negative meaning.

At CEO Endorsement, please provide the following information:

Component 3 – Please provide more information on the sustainable livelihoods activities and how they will be supported.

Component 4 – Unfortunately, environmentalists generally have a weak track record in developing effective communications strategies for behavior change with general public or even targeted groups. How will the communications strategy be developed and tested? How will behavioral science be incorporated?

10/16/2018

No, overall this project needs significant editing and reorganization to make a logical and well-founded program of work and ensuring that there isn’t confusion between outputs and outcomes.

Please address the following:

Component 1

Outcomes

- The definition of this outcome, outputs and indicators need to be rethought.
- The outcome is the creation of a plan, but much of this components appear to be about the implementation of a plan
- Will the financing be identified or actually directed toward PA management? How will sufficient be defined given that so many park systems are chronically underfunded?
- How will institutional capacity be defined and measured? What is adequate?
- Will the METT score increase in all PAs or just target PAs?
- Legislation is mentioned in the body of the PIF, but is absent from Table B. It would be good to include this in Table B as an Output. How will the project ensure that legislation that’s developed will actually be passed as this is a challenge many GEF projects have?
Output

- 1.1 and 1.3 is to be under implementation while 1.2 is just developed. Was that intentional?
- 1.4 – This is an outcome. What is the corresponding output? This also seems a bit out of place from everything else.

o The GEF does not support general awareness raising campaigns. How will these activities relate to and support the outcomes of this project?

Component 2

- Do you want to include an indicator on the number or coverage of the sustainable land use plans developed?
- Will the engagement of women be encouraged?
- Output 2.3 – In the body of the text, this output covers many different activities. Is the plan to choose during PPG? How will they be selected?

o Para 29 – Are forest inventories for the purposes harvesting timber and/or NTFPs? How will this improve the management of the park? Will this only be within the park or also in the buffer zone?

o Para 30 – This describes ‘huge’ ecotourism potential. Can you please describe how ecotourism would contribute to the conservation of biodiversity? How significant is the potential market?

Component 3

- Please talk about how this will use existing systems and who will manage this after the life of the project.
- The indicator on MEA reporting seems like a minimal baseline. It would be good to think about an indicator that looks at use or quality.
- These systems are often not integrated into use by the rest of the government. How will the project address this challenge?
- How does the capacity building here work with the capacity building in component 1?
- The resources for this seem rather high. What will they be used for?
- Will this include any sort of monitoring of buffer zone areas? Para 40 states that it is but the description in Para 32 does not mention anything about buffer zones nor does Table B.

Agency Response

<table>
<thead>
<tr>
<th>GEF Comment</th>
<th>FAO Response</th>
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<tbody>
<tr>
<td>Question 2</td>
<td>No, while this project is much improve</td>
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</table>
Component 1:

- 1.1.2 - Tool development – Who will manage the tools during and after the project to ensure continued updates and usage after the project? How will the project make sure these tools are actually taken up by relevant ministries?

FAO has developed a set of open-source tools (Openforis, SEPAL, EarthMap) that are routinely used by governments and other GEF Agencies to support land use planning, and more recently, to collect data needed to report to the three main environmental conventions (UNFCCC, CBD, UNCCD). These are very easy to use and no particular expertise is needed to run them. The tools will be managed by ministerial counterparts (national and local level and staff in national parks).

During project preparation, FAO will train local stakeholders so that they do the diagnostic assessment themselves (the preliminary results shown in table 2 of the PIF are part of this effort), analyze alternative investments, and agree on a way forward. The same tools will be used to monitor project implementation on an annual basis (under Component 4). These tools will be managed by ministerial counterparts (central, local and staff in national parks). Other interested stakeholders (NGOs, local communities) will be trained if interested.

Finally, the data that will be collected will be linked to convention reporting processes as well as FAO processes (FRA, NAP-Ag, SDG reporting, and BD mainstreaming).

- 1.1.2 – Financial incentives – This description seems too brief for what it is trying to do, which is potentially quite large and important for the long term sustainability of the project outcomes. Is this limited to creating the policy and regulatory frameworks for such arrangements? Or for actually establishing them? Either way, it would be good to have more attention given to these activities in the logframe.

Financial sustainability is an important part of the project. Please refer to question 2.1.2 below for a full description of the financial plan in the context of this project.

Component 1 will deal with the enabling environment (rules and norms), including those related to the buffer zones (in the short run) and the broader landscape (in the long run). Any funding mobilized will be accounted for under component 2 (within the PA) or component 3 (in the buffer zones). Outcome level indicators regarding funds mobilized have been included for both of these Components.

Component 1 will also address links to other strategies and regulations. For instance, in 2016 the GOA adopted new Tourism Strategic Roadmap in 2016 which identifies ecotourism as a priority tool for Sustainable Tourism Development. Potential of PAs for tourism are going to be explored to increase contributions to national development. In addition, FAO is currently working with the EBRD on the development of the tea sector near Shirvan NP and links will be explored during the preparation phase.
<table>
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<tr>
<th><strong>Component 1:</strong></th>
<th><strong>Component 2:</strong></th>
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<tbody>
<tr>
<td>1.1.3 – Will actual land use plans be an output or just training? Or is this linked to other outputs?</td>
<td>The project will develop and implement land use plans. For management purposes, stakeholder training (i.e. tools and capacity that will be used to develop the plans) has been included in output 1.1.3, but this is expected to result in the plans to be implemented under Component 3 (output 3.1.1)</td>
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<tr>
<td>2.1.2 – This system has the potential to be an overly complicated technical and bureaucratic solution to a problem that won’t actually be used in the long run. How will the project avoid this?</td>
<td>Agree. As mentioned before, the project will base on FAO’s open-source, GIS-based, easy-to-use tools. These tools, in particular the OpenForis suite, are very flexible. Therefore the government can collect only the data it needs and will actually use for land use planning and BD monitoring. This system is also easily linked to FAO’s existing databases (GSP/SOC, GAEZ, FRA), so it will benefit from additional information.</td>
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<tr>
<td>2.1.2 – Sustainable finance plan – Will the project do anything to actually set up the implementation of these ideas or just develop a plan? STAP has criticized GEF projects for often having promises of sustainable financing activities (such as PES) that fail to materialize. How will you avoid this?</td>
<td>The goal is to develop and start the implementation of the financial plan (an outcome indicator in the log-frame) is the amount of resources mobilized. The financial sustainability plan will consider multiple sources (i.e. not rely on one or two major resources) to improve the likelihood of sustainable long-term financing for the PA system. Opportunities from various financing mechanisms will be examined during the PPG (comprehensive survey and analysis undertaken) - including potential sources through: (i) Attracting funds, e.g. external supports, donations such as oil/gas corporations, private philanthropists, other government agencies or tax revenue sharing; (ii) Generating funds (sharing revenue (covering both costs and benefits) with local stakeholders and PAs, charging service fees and local taxes); and (iii) Introducing market based mechanisms (tourism fees, products sale, and from new markets e.g. carbon finance, PES) and improving wider policy and market conditions for these. There is interest and some development in nature-based tourism in PAs in Azerbaijan (link to national Tourism Strategy) and relevant agencies will be engaged during the PPG stage to explore opportunities at each of these levels.</td>
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gy) and relevant agencies will be engaged during the PPG stage to explore opportunities at each of the pilot PAs.

In addition, the project will undertake a valuation of the financial/economic and social contribution provided by the ecosystem services of each pilot PA, e.g. for agriculture, water supply, tourism. This will contribute evidence to government decision-makers on the importance of maintaining the core operational costs and investments to the PA system to support other economically important sectors and in helping to meet other development targets, e.g. agriculture and food security, water provision.

The project will also introduce new financial tools (such as business planning) for the PA managers and surrounding communities involved with the pilot PAs with devolved funding and management responsibilities (for example to NGOs, local communities, individuals or businesses) as well as the introduction of more effective management measures (e.g. improved monitoring system and management plans) which should improve the cost-effectiveness of running the PA system.

Component 3

3.1.1 – Do the necessary legal and regulatory frameworks exist for co-management or will that be a part of component 1?

The regulatory legal and framework for co-management does not exist. The current framework establishes minimum conditions that should be met regarding buffer zones. The project will help develop this framework under Component 1. This has been made explicit in the PIF (paragraph 41, second bullet).

Minor:

- Please correct the word co-opted on page 19 as it has a negative meaning.

Word has been removed.

At CEO Endorsement, please provide the following information:

Point taken. This is part of the PPG process. FAO routinely carries out a socioeconomic assessment to establish a baseline and understand livelihoods. This information is used to develop the participatory investment plans that will be implemented by the project.
Component 3 – Please provide more information on the sustainable livelihoods activities and how they will be supported.

Component 4 – Unfortunately, environmentalists generally have a weak track record in developing effective communications strategies for behavior change with general public or even targeted groups. How will the communications strategy be developed and tested? How will behavioral science be incorporated?

The following text added as Paragraphs 49 and 50.

Based on the project baseline, current behavior of the target audience will be identified. The barriers will help us identify the incentive or knowledge required to change the current behavior to the desired behavior. The project will address it through project activities like – For example, developing knowledge products in regional languages or working with the local government to provide better access to resources.

For instance, the project could undertake a study of the social, economic and cultural values of the PA network (or just the pilot PAs). Results from such a study could be promoted among specific government and local community groups and fed into their decision-making processes. In the case of the government, the results would be used to argue for sufficient and sustainable central government financing to cover the core operating and investment costs of the PA network to ensure the continued delivery of ecosystem services provided by the PA to other key development sectors (particularly surrounding agriculture). In the case of awareness-raising efforts in local communities surrounding the pilot PA, highlighting the importance of the neighbouring PA - in terms of local livelihoods/jobs, incomes, opportunities and services provided - should encourage greater community engagement and participation in the co-management of the PA as they would understand their own success is dependent on the sustainable management of the PA. So in these senses, we are looking for behavioural
Global Environment Facility (GEF) Operations

Co-financing

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

Secretariat Comment at PIF/Work Program Inclusion
4/8/2019
Yes.

10/16/2018
No, please describe any investment mobilized.
We expect to see co-financing from the private sector and CSOs at CEO Endorsement.

Agency Response
no response needed

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

Secretariat Comment at PIF/Work Program Inclusion
10/16/2018

Yes.

Agency Response No response required.

The STAR allocation?

Secretariat Comment at PIF/Work Program Inclusion
10/16/2018

Yes.

Agency Response No response required.

The focal area allocation?

Secretariat Comment at PIF/Work Program Inclusion
The LDCF under the principle of equitable access

Secretariat Comment at PIF/Work Program Inclusion
10/16/2018
NA

Agency Response N/A

The SCCF (Adaptation or Technology Transfer)?

Secretariat Comment at PIF/Work Program Inclusion
10/16/2018
NA

Agency Response N/A
Focal area set-aside?

Secretariat Comment at PIF/Work Program Inclusion
10/16/2018
NA

Agency Response N/A

Impact Program Incentive?

Secretariat Comment at PIF/Work Program Inclusion
10/16/2018
NA

Agency Response N/A

Project Preparation Grant

5. Is PPG requested in Table E within the allowable cap? Has an exception (e.g. for regional projects) been sufficiently substantiated? (not applicable to PFD)
Secretariat Comment at PIF/Work Program Inclusion
10/16/2018
Yes.

Agency Response No response required

Core indicators

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

Secretariat Comment at PIF/Work Program Inclusion
4/25/2019
Yes. We note the difficulty in estimating GHG emissions reductions at this time and anticipate a revised number at CEO Endorsement.

4/8/2019
No, the project is still missing GHG calculations.

10/16/2018
No, projects should include all relevant core indicators including carbon emission reduction figures given the improved land management and reduced degradation predicted.
Agency Response

Point taken. GHG emissions have been provided using EX-ACT, i.e. 2.4 million tCO2e over 20 years (5-year implementation + 15-year capitalization phase). Please note that GHG have a large uncertainty as it is not clear what activities will be done on the ground. More precise calculations will be provided during the PPG phase.

EX-ACT simulations (one per PA) have been uploaded to the GEF Portal.

Project/Program taxonomy

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

Secretariat Comment at PIF/Work Program Inclusion
4/25/2019

No, please revise the taxonomy selections in the Portal entry not just in the appendix.

10/16/2018

No, the project needs to select specific items within each of the high level (level 2) terms. Otherwise every possible term is selected under general terms like Biodiversity.

Agency Response
The Taxonomy Worksheet has been filled out and appended to the submission.

Part II – Project Justification

1. Has the project/program described the global environmental / adaptation problems, including the root causes and barriers that need to be addressed?
Secretariat Comment at PIF/Work Program Inclusion
4/8/2019
Yes.

10/16/2018
No, please address the following:

National context – This project takes a defeatist attitude towards the achievement of the Aichi Biodiversity Target that Azerbaijan has agreed to, particularly with a fairly strict definition of PA. Good PA management is important too, so it may be better to simply focus on that. Please revise.

Barriers – The list of barriers seems fairly general rather than specific to this context. It would be good to flesh out the private sector barriers as well since currently it’s many different things described quickly.

Land management and ownership – Please describe the current system of land management, ownership, and use rights in the buffer zones and parks. Does the national park system have any authority in the buffer zone? If not, who does? Do currently management systems present challenges for successful sustainable management?

Agency Response
no response needed.

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

Secretariat Comment at PIF/Work Program Inclusion
4/8/2019

Yes, at CEO Endorsement we would like to see more detail on collaboration with the MPA project and lessons learned.

10/16/2018

No, please address the following:

Table 1 – Declining productivity needs to be defined and explained. It appears that there have been significant reductions in cropland in the PAs which would appear to be a good thing (this hasn't been clarified in the text), but may also explain the reduction in productivity as measured by satellite data.

An existing GEF project working to improve the management of MPAs in Azerbaijan was mentioned, but there is very little information on lessons learned or cooperation. Please expand on this work.

Para 15 and 16 – These highlight existing initiatives on training and planning. Rather than simply saying the courses are ineffective – please explain are the gaps in training? With the planning, please explain why these plans have not be implemented and what the problems have been, so that the project can then plan to avoid these issues.

Please note that decade should be used instead of decennial.

Agency Response

Point taken. No response needed.

3. Does the proposed alternative scenario describe the expected outcomes and components of the project/program?
Secretariat Comment at PIF/Work Program Inclusion

4/8/2019
Yes.

10/16/2018
No, please complete the responses to other questions and revise.

Agency Response No response needed.

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

Secretariat Comment at PIF/Work Program Inclusion

4/8/2019
Yes.

10/16/2018
Please see the response to question 1.

Agency Response No response needed.

5. Is the incremental / additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?
Secretariat Comment at PIF/Work Program Inclusion
4/8/2019
Yes.

10/16/2018
No, please address the following:
Component 1 – This is just a list of government priorities and it is hard to see how these directly relate to project activities. Please be more specific on not just government money, but the activities that this will build upon.
Para 43 – It is unclear how FAO resources in Turkey apply here.

Agency Response
No response needed.

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

Secretariat Comment at PIF/Work Program Inclusion
4/8/2019
Yes.

10/16/2018
No, please include reference to KBAs here. Also, local livelihoods are not GEBs.
Agency Response The section of GEBs has been updated.

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

Secretariat Comment at PIF/Work Program Inclusion
4/25/2019
Yes. Thank you for these revisions.

4/8/2019
No, please strengthen the justification for this project in these areas.

10/16/2018

Responses are needed to other questions before this can be addressed.

Agency Response Point taken. The section has been strengthened.

Project/Program Map and Coordinates

Is there a preliminary geo-reference to the project’s/program’s intended location?
Secretariat Comment at PIF/Work Program Inclusion

4/8/2019

Yes. However, we believe the circles are supposed to highlight the selected PAs. Please make sure they line up and note their purpose.

10/16/2018

Yes. Thank you for the well-made map.

Agency Response

Point taken. Corrected

Stakeholders

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

Secretariat Comment at PIF/Work Program Inclusion

4/8/2019

Yes.

10/16/2018

No, it appears a comment was left in on indigenous peoples. It is unclear which indigenous peoples are in the area and perhaps they might be better defined as local communities or ethnic minorities. Because project development needs to carefully include these peoples, it is important that at PIF this information is clear. My understanding is that, according to FAO’s safeguards, FPIC would be required for indigenous peoples.
Also, the CSO engagement seems quite limited in scope. Is this really all they will be doing? With the private sector, it seems like they will be engaged also in a quite limited way and with the project asking for something very specific rather than engagement that allows them to be partners and to help shape the project in ways that will be most effective.

Please revise this section.

**Agency Response** No response required

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**Gender Equality and Women’s Empowerment**

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

**Secretariat Comment at PIF/Work Program Inclusion**

4/25/2019

Yes, thank you for the details provided here. As the project is developed, we encourage the team to consider qualitative as well as quantitative approaches to assessing women’s empowerment and engagement.

4/8/2019

No, given the many activities around decision making both locally and nationally – it’s surprising this project won’t work on women’s participation in decision-making. It would be good to see how this project could address this issue. At the same time, it would be good to discuss the different roles and work activities of men and women in rural areas and how the project will seek to include activities relevant for both groups. The project is described as “encouraging” women’s participation. Will anything be done to ensure women’s participation, such as holding meetings in ways that allow women to speak up as well as attend? (what this looks like depends on cultural context).
No, this section does not adequately consider how this project can both avoid disproportionate harm to women and improve women’s situations. There are often gender differences in natural resource use. How will the project make sure that these are understood and accounted for during PPG? Will a gender analysis be done during PPG?

**Agency Response**

Point taken. The project follows FAO’s Policy on Gender Equality to achieve equality between women and men in sustainable agricultural production and rural development. In this regard, the project will make every effort to ensure women’s participation, including on decision-making. The text has been modified to reflect this.

**Private Sector Engagement**

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

**Secretariat Comment at PIF/Work Program Inclusion**

4/25/2019

Yes, thank you.

4/8/2019

No, smallholder farmers and livelihood activities include the private sector. Please discuss that too.

10/16/2018

No, while there is a long section on private sector engagement it seems to be mostly a general discussion of how the private sector has been engaged with PAs in the past rather than a specific discussion of this project and what it can do. Also, logically the private sector would be very much engaged in the areas outside of protected areas where this project will be working. Please discuss.
Agency Response  Point taken. The section has been updated to included smallholder farmers.

Risks

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

Secretariat Comment at PIF/Work Program Inclusion
4/8/2019
Yes.

10/16/2018
No, overall the risk table is fairly complete but there are blank spaces. Please complete it.

Agency Response  No response required.

Coordination

Is the institutional arrangement for project/program coordination including management, monitoring and evaluation outlined? Is there a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives in the project/program area?
Secretariat Comment at PIF/Work Program Inclusion
4/8/2019

Yes. At CEO Endorsement, please include more information on non-GEF funded and non-FAO projects that are relevant in the country and coordination with them.

10/16/2018

No, as mentioned previously coordination with the MPA project would be important. What about other donor funded programs and government initiatives?

Agency Response
Point taken. No response required

Consistency with National Priorities

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

Secretariat Comment at PIF/Work Program Inclusion
4/8/2019

Yes.

10/16/2018

No, please do not list every potentially relevant report. It's hard to see how this relates to some of the reports listed (Minamata Initial Assessment, Technology Needs Assessment under the UNFCCC, etc). Please clarify what is meant by Aichi national targets. Please revise to be more targeted and specific in what is described here.
Knowledge Management

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

Secretariat Comment at PIF/Work Program Inclusion
4/8/2019
Yes. At CEO Endorsement, please provide more detail on this section.

10/16/2018
No, please provide more information here.

Agency Response No response required

art III – Country Endorsements

Has the project/program been endorsed by the country’s GEF Operational Focal Point and has the name and position been checked against the GEF data base?
Secretariat Comment at PIF/Work Program Inclusion
10/16/2018
Yes.

Agency Response No response required.

EFSEC DECISION

RECOMMENDATION

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

Secretariat Comment at PIF/Work Program Inclusion
5/3/2019
Yes, this PIF is being recommended for technical clearance along with accompanying PPG.

4/29/2019
Yes, this PIF is being recommended for technical clearance along with accompanying PPG. However, please correct the CO2 estimates as it should be 2,397,845 rather than 2.5.

4/25/2019
No. This project is technically ready, but needs to address the taxonomy selection and the project length as entered in the portal.

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

Secretariat Comment at PIF/Work Program Inclusion

**Review Dates**

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<tr>
<td>Additional Review (as necessary)</td>
<td>4/8/2019</td>
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<tr>
<td>Additional Review (as necessary)</td>
<td>4/25/2019</td>
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