

No.	Project Comment	TE Response	Notes or Actions
1.	<p>This project completed the former UNDP SES procedure, the ESSP.</p> <p>The new procedure (UNDP Social and Environmental Safeguards Procedure) the new corporate policy is mandatory since 2015. Since this project dates back to 2014, this did not apply to this project.</p> <p>The latter contains many project design and management tools that improve project design, and implementation drastically. Such as stakeholder analysis and engagement. As noted in this TE, stakeholder engagement was poor possibly causing a lack of buy in on the TPA set up.</p> <p>Although within our PRODOC and UNDP POPP (project management procedures), we have participatory approaches which mainstreaming stakeholder engagement, as mandatory elements of project design and management. It is true that the new SES procedure now reinforces this.</p>	Incorporated into final	
2.	acknowledged	Incorporated into final	
3.	<p>It should be noted that the project was designed with local stakeholders.</p> <p>The 'systems' approach to PA management, which requires cooperation from two distinct sectors, Department of Marine Resources and Department of Environment, was not well accepted by marine resources as expressed by Claudia/ June.</p> <p>It would be useful to explore the reasons for this and provide some recommendations as to how to conciliate the ambition of each sector.</p> <p>Ex.</p> <ul style="list-style-type: none"> - Marine resources is a consolidated department which focuses strongly on private sector and may not understand importance of ecosystems sustainability and connectivity between land and ocean. A Ridge to Reef approach may be appropriate for a future project. 	Incorporated into final	
4.	<p>I think it should be considered that GEF projects, as 'environment and EBD projects' have found resistance from private stakeholders and governments. There is still a general feeling that lands will be protected for the sake of biodiversity and not for the benefit of private sector benefit or buffer farmer communities. There is little understanding of ecosystem services which benefit people. Consequently it is likely that this project confronted resistance especially by private stakeholders. However, part of the objective of this project was to build the institutional setting to enable PA creation and in so doing to lead towards a change</p>	Incorporated into final	

	in sentiment and behavior regarding benefits from PAs. Has this been achieved? Is there now more understanding generally in the country of the benefits of ecosystem services? Or is government pleased with the institutional setting now in place to lead to stronger PA management?		
5.	What measure was used to say that te MMZ CZ is well managed? We did not get much evidence of their monitoring and conservation efforts. It seems more of a use of the resources than conservation but I could be wrong.	Incorporated into final	
6.	I do not fully agree with this statement, there are very few communities that are closely linked, both physically and economically, to the PAs. The PA communities encompassed the general public hence general public awareness was done	Incorporated into final	
7.	Legislative revisions thanks to our project outputs. And financing mechanism advancements.	Incorporated into final	
8.	This is a great achievement. Especially in a country that had little understanding of how TPA could be operationalized, or benefit both economically and environmentally the local populations	Incorporated into final	
9.	<p>We discussed with June/DRM through Claudia to propose developing a consolidated document as one last output that the former CTA could provide as suggested by this TE.</p> <p>However, June said that this was not required since the government was already using the legislative pieces and revisions provided by the project, without need to consolidate this for easier use by the GOV. Consequently, I do believe that the project outputs in terms of legislative advancement should be considered as successful outputs.</p> <p>The project implementation phase may not have witnessed the adoption of this legislation but during this phase the government has incorporated it within its political parliamentary agenda to be reviewed and adopted/or not. Which is a sign of success.</p> <p>This suggestion of an additional output was discussed with Claudia (PC), and Max (Barbados MCO) and Maria (RTA). Claudia's discussion with June led to the decision to not prepare any additional reports.</p> <p>It should be noted that the MCO DRR/ Ugo Blanco, has clarified that Lavern, the GEF FP from which this issue stemmed has a history of difficult relationships with UNDP and other donor agencies.</p> <p>I suggest that with regards to the outputs and usefulness of this project to advance our development outcome any testimonial information by government actors/ GEF FP or other should be</p>	Incorporated into final	

	<p>checked against the actions taken by the government and not rely uniquely on testimony.</p> <p>I say this due to the controversial statements of the GEF FP Lavern, that do not align with what we see is happening, such as the use of project outputs/legislation etc. which the government is treating currently in parliament.</p>		
10.	<p>It seems to me that 2,3,4 depend on political will</p> <p>This project had an original closing date of May 2020. Due to COVID it was granted a 6 month extension.</p> <p>Although the extension was granted, it may be too short to achieve finalizing these outputs, as COVID restrictions are still in place for some elements that depend on travel, such as importing high tech machines for the Interpretation center.</p> <p>So, I would assess the non-achievement of some outputs as related to the sustained COVID impacts.</p>	Incorporated into final	
11.	<p>Rather than construction, it may be best to say ‘development of an interpretation center’, because the main elements of this activity are the ‘Interpretation center, high tech tanks and turtle rehabilitation material, etc.’ construction does not seem the right term for this type of project. Also much of the construction will be based on co-financing. I can share an analysis of this if needed.</p> <p>OFP COMMENT It is unclear why this work was advanced as the GEF-OFP had articulated from both a sustainability and financial consideration such an agency was not feasible in several PSC meetings and other stakeholder engagements. I added get clarity on</p>	Incorporated into final	
12.	<p>This is great.</p> <p>The project has presented to the different gov stakeholders the fact that marine and terrestrial dpts must work together. Creating the ground for a systemic approach.</p>	Incorporated into final	
13.	<p>The Development Plan work is still ongoing with final draft slated for September-November.</p>	Incorporated into final	
14.	<p>I am not clear on the statement about the technical input</p>	Incorporated into final	
15.	<p>This issue should be re-discussed with the IP and understand their view on this legislation. Claudia Drew discussed this with June and she received a different view. June said this was unnecessary and that no additional output is required, that the legislation as it is is being reviewed by the government.</p> <p>Please make sure to confirm this statement before finalizing this section of the TE.</p>	Incorporated into final	
16.	<p>Please note that the Legal Department has indicated that based on the proposals for the legal alignment,</p>	Incorporated into final	

	the comments of the consultant will be taken onboard and the legislation amended as appropriate		
17.		Incorporated into final	
18.	Does numbers refer to the overall population? I was not aware that it had decreased to a point of being insignificant. Was there an output for this that ca be shared?	Incorporated into final	
19.	No data was shared, it was just told to us by Marc Williams.	Incorporated into final	
20.	Tricia King (formerly Tricia Greaux from the DMR is now the Executive Director)	Incorporated into final	
21.	This project has opened ground and built institutional capacity of gov for management of PA systems	Incorporated into final	
22.	I understand that this was conveyed by project stakeholders at the time of the Inception workshop. However, GEF project undergo a thorough and strongly participatory design phase (PPG phase) to develop the PRODOC. At the end of the PPG there is a validation Workshop. the project design/PRODOC validation happened a year before the start of implementation and things might have change d. However GEF regulations on design are very strict and it is frankly not up to UNDP to change this.	Incorporated into final	
23.	Does this result show progress towards having a PAA? Although the project output was not achieved yet, this seems that this has now been put on the table and gov is finding ways to materialize an institutional arrangement for management of PA?	Incorporated into final	
24.	Please clarify this point. Do not understand whether the documents meet these international standards or not?	Incorporated into final	
25.	This is unfortunate. UNDP SES/ GEF UNDP guidance now have Stakeholder Engagement Plans as mandatory management documents/annexed to PRODOC. This was not the case in 2014/5. The lack of a plan to assess the inclusion of stakeholders is a problem for the evaluation. However, it should be considered that UNDPs project management operational standards (POPP) do contain requirements for participatory approaches in design and management. So although Stakeholder engagement is not included in a separate plan, it has been mainstreamed within the project. Some evidence of this can be reviewing the workshops, meetings, trainings, PSC, communication plans, etc. and participants lists/invitees etc. This can enable to assess whether the project did engage with key stakeholders.	Incorporated into final	
26.	Yes, and that stakeholders are thoroughly assessed to make sure that new projects are not duplicating projects, functions, etc. already in process.	Incorporated into final	
27.	This has been highly affected by COVID. I think a discussion with Claudia should be had. She could	Incorporated into final	

	provide the details of the activities that will not be achieved, such as 'importing high tech material' or other that depend on open airspace or other limitations on travel and movement.		
28.	This really needs to be consistent. The SKSTMN is building an Interpretive Center and the Marine Species Rehabilitation Center is coming under this project.	Incorporated into final	
29.	This is also an interpretation center since it will be developed to facilitate tours and learning. It will in no way take away from the SKSTMN interpretation center but rather augment it.	Incorporated into final	
30.	This will depend on the political processes that will not depend on the project. I don't think we can expect this to happen by November. There has been elections in June 2020 and changes in government. The new gov needs to be briefed on all types of legislation not only PA legislation. So it is unlikely that we will reach this output despite the project efforts.	Incorporated into final	
31.	I disagree with this position. While the Minister is new, the administration is not. I am working with the Legal Department to have the document tabled at the next sitting of Parliament for the first reading. I have indicated to the Hon. Minister that this is a very high priority	Incorporated into final	
32.	All three depend on the government, so this could be noted. What the project does is develop the policies and draft agreements, not the legislative approvals.	Incorporated into final	
33.	3. The financial plans were presented to the then Minister of Environment. The new Minister has been told about the plans and they will be presented to him shortly. The financial plans are recommendations that will be used to assist the DOE in the implementation of their sustainability plan	Incorporated into final	
34.	As in the comment above. I suggest this be taken out or reviewed with June and Claudia. After discussions with JUNE through Claudia, it was stipulated that this additional report to consolidate recommendations based on project technical outputs, is not really necessary at this time. The legislation is being treated under normal political processes. There were elections in June 2020, and COVID since March/ with lock down etc. so this might have delayed treatment of this legislation'. Additionally, the government has to push forward this based on its own buy in and interest. So it may be a key takeaway as stated by the TE is the business case for the TPA. More time should have been spent on this by the CTA.	Incorporated into final	
35.	I agree with this. I do think that given the context of land use in SKN it would be good to combine a new project with	Incorporated into final	

	<p>Sustainable Land management in addition to PAs. This would focus on small holder farming, enable to connect the reasoning of links from terrestrial (agri) to marine (drainage/pollution from ag practices). So the focus is not as strongly on conservation but on 'sustainable use of resources' making a case to incorporate small scale farmers and private sector within PA models.</p> <p>The natural IP would be the Min of AG, with fisheries and dpt of env within it. But institutional coordination of a SLM /EBD project will be key.</p>		
36.	The island of Nevis moved away from sugar production since 1970's before St. Kitts in 2005 and ventured into sea island cotton production for years.	Incorporated into final	
37.	The Nevis Physical Planning and Development Ordinance 2005(amended 2019) gives some protection against development above 1000 ft contour line. The NCEMA Act if pass will give full protection that it greatly need.	Incorporated into final	
38.	GEF project are now integrating SLM and EBD. It would be a good recommendation to focus on both aspects, since the problem stems from overexploitation of NNRR/ unsustainable resource management, in buffer zones. Working with these stakeholders in co-management would be a good way forward for a second phase. A Ridge to Reef approach	Incorporated into final	
39.	As of 2018, it is The Department of Physical Planning and Environment (DPPE)		
40.	Currently DMR(Department of Marine Resources)		
41.	Farmer cooperatives are a key stakeholder. Were they included in the discussions on PA management? How is the Min of Ag/dpt of Env engaging with these and other private / community stekaholders?	No they were not?	
42.	DPP since 2018	Incorporated into final	
43.	GEF UNDP is not looking into landscapes developments. This enables to focus on more 'realistic' approaches which include land management and PAs, so there is more engagement with relevant sectors and stakeholder. Based on the problem analysis of the prodoc, it does seem that unsustainable land practices is an issue. However, this barrier to conservation was not duly addressed, since this is an EBD project, the requirements were back in 2014 to focus strongly on Biodiversity and setting up PA systems, not so much on livelihoods or SLM. The latter would have better tackled this issue of stakeholder engagement and sustainability of buffer areas etc.	Incorporated into final	
44.	It should be noted that during the project implementation phase, the dpt of Environment changed ministries twice.	Incorporated into final	

	<p>Initially the project Implementation Partner was Min of Sust Develop, with the Director /DMC June within, in the dpt of ENV. Then the Gov moved the dpt of Env to the Min of AG and marine resources. Now it has moved in June 2020 again. This should be discussed in this TE as an obstacle and also make suggestions as to what institutional arrangement is best.</p> <p>The funding stayed within the Min of SD, so approvals of any procurement by June/dpt of ENV once under the Min of AG, still required signature by Min of SD (in addition to sign by Min of AG), this delayed procurement substantially.</p>		
45.	<p>Although this would have been accepted and welcome on the Nevis end to ensure that objectives were properly implemented, simply a bi-weekly/monthly visit by the Project coordinator would have been suffice. Office space was readily available if such a route was to be taken.</p>	Incorporated into final	
46.	<p>The DMR seems to have more political weight (MPA) than the dpt of Env (TPA). Agree this affected implementation as the DMR did not necessarily have buy in on the 'systemic' view. So more understanding on the connections between terrestrial land uses and the impacts on the sea ecosystems should be promoted to make the marine sector understand</p>	Incorporated into final	
47.	<p>The Interpretation Center was already set outside of this project and the Marine Species Rehabilitation Center is correct.</p>	Incorporated into final	
48.	<p>As mentioned above this stakeholder is key to sustainable land use. This sector was probably not prioritized because the main objective of this project was the PA institutional system in place. This project dates back to earlier EBD style projects. Today GEF UNDP has moved into landscape planning and SLM with EBD better representing an ecosystems approach and this leads to prioritizing all stakeholders who have a stake in land use in and around PA, such as farmers.</p> <p>I agree with this TE in that proper stakeholder identification and analysis would have led to better stakeholder engagement. Currently UNDP GEF safeguards policy emphasizes this.</p>	Incorporated into final	
49.	<p>This is a missed opportunity, since this is a key stakeholder in developing sustainable funding mechanisms.</p> <p>Claudia do you have any comments on this lack of engagement?</p>	Incorporated into final	
50.	<p>Some explanation would be useful as to what the project approach was to engaging with the private stakeholders.</p>	Incorporated into final	

	<p>Was there never an attempt? Or was there at the outset of the project? Were they included in the Validation workshop, and the inception workshop? Did the PCU have a strategy?</p> <p>I think this is a key actor, and understanding their views on PA is key. What was the main challenge in engaging with them?</p> <p>Claudia do you have any comments? It would be a great lesson learned if we had any thoughts on this.</p>		
51.	<p>I think that there were also other stakeholders within this area that had sustainable financing components in place prior to the inception of this project. One example would be the sea turtle ecotourism which was developed and implemented in 2008/2009 with a full published outcome assessment in 2016. The Interpretation is also a component of this work and will function to maintain employment within the communities for sea turtle conservation. These projects were all components of GEF SGP funding and were not considered in the project development here or ongoing work for many years.</p>	Incorporated into final	
52.	<p>This is a key takeaway and lesson learned for a future project.</p> <p>The management arrangement is key to making a model where MMA and TPA coordination is central. If the institutions are separate and have their own funding sources, and agendas then it slows integration and systemic thinking. If the Dpt of Env under the MoSD or Mof Ag manages the project and its budget, then marine resources may not comply or work together as willingly with the project.</p> <p>For a future project this should be taken into account.</p>	Incorporated into final	
53.	One or more?	Incorporated into final	
54.	Incomplete thought or sentence	Incorporated into final	
55.	Additional stakeholders like the Coast Guard were added as implementation advanced	Incorporated into final	
56.	<p>This may be true.</p> <p>But the issue of having the funding go through the Dpt of Env MoSD is also an issue to be thought out. If the DMR was not willing to work in coordination, this does not mean that the project did not make efforts to do so.</p> <p>How can this be phrased in a way that it is a lesson for future projects and less of a criticism to the project ?</p>	Incorporated into final	
57.	Still awaiting confirmation.	We need this	
58.	?	Tried to reword for meaning	
59.	Maybe you could elaborate or give a recommendation that would help to conceptualize what can be done next time.		
60.	Please see my earlier comments	Incorporated into final	
61.	This seems out of place. I think it is to be a statement of fact and not assumptions and based on research	Incorporated into final	

	into the matter this should be easily established that there are not fees. This also leaves out all other stakeholders who may be leading tours, etc and having income from actual monitoring.		
62.	And because it actually conflicts with operations by other stakeholders and NGOs, etc. that have already had sustainable financing mechanisms in place and would actually cripple some of them if everything was changed.	Incorporated into final	
63.	Comments above on this	Incorporated into final	
64.	See previous comments.	Incorporated into final	
65.	See previous comments.	Incorporated into final	
66.	While making sure current stakeholders are incorporated and not expected to forego their operations.	Incorporated into final	
67.	And that full background work is done to make sure that the planned activities are not already duplicating other projects.	Incorporated into final	
68.	1. I see the name Protected Areas used by the Stephanie Hodge. I know it was changed to Management Areas. 2. The term Theory of Change is used in one of the section headings. It looks like what is actually stated in that section is process of change but not theory. 3. The Evaluation Framework should have a feedback loop mechanism. It is stated in the document but not in the table.	Incorporated into final	
69.		Incorporated into final	
70.	1) The document can benefit from further editing as there are poor sentence structures, disjointed points, etc. making some parts difficult to read or understand the point being made.	Incorporated into final	
71.	2) All acronyms are not included in the Acronym and Abbreviations at the start of the document e.g. NCTF, CTA etc. References should be available to allow clear understanding for all readers inclusive of those that were not involved in the project or work in the environment sector.	Incorporated into final	
72.	3) Considerable focus has been placed on the failure to establish the Protected Areas Agency (PAA) as it was a critical output in the design. However, not much assessment on the alternative mechanism as a means of sustainability and the achievement of the same objective has been undertaken. An objective can be achieved utilising alternative means.	Incorporated into final	
73.	4) Very little attention was given to the activities undertaken by the Government of St. Kitts and Nevis (GSKN) through other means in the context of it being co-financing for the Project and providing foundational outcomes which enable cost-savings which should have been capitalised upon to	Incorporated into final	

	advance the need of complimentary activities inclusive of additional community level engagement and involvement.		
74.	5) A more critical assessment is needed regarding the project management by the PCU and UNDP. Considerable time is spent making excuses for the underperformance in that regard.	Incorporated into final	
75.	6) Reference has been made throughout the document regarding seven (7) protected areas. However, the project document and the terminal evaluation page 19 indicated “proposed protected areas for potential site interventions...”. It was not intended that if not found to be feasible that all would be declared under the project but priority be given to critical areas such as Nevis Peak National Park and Camps River Watershed Area as the Department of Marine Resources (DMR) had commenced advancement of work to declare the Marine Management Area (MMA) prior to start of this initiative. However, collaborative work could have been undertaken. The narrative used in this report regarding these matters should be assessed.	Incorporated into final	
76.	This should read “... Department of Economic Affairs and Public Sector Investment Planning.”	Incorporated into final	
77.	The first sentence should read “This is the first nationally implemented GEF biodiversity project for the country.”	Incorporated into final	
78.	The comma on line 3 after “PA system” should be replaced with a full stop and the remaining lines should be deleted.	Incorporated into final	
79.	The current paragraph should be deleted and replaced with the following “The strategy and PA model required modification in light of human and financial considerations in order to ensure sustainability after the project was concluded. Therefore, it was proposed that a PA financing system be formulated in close collaboration with the Ministry of Finance in order to ensure congruence with existing legislation and procedure.”	Incorporated into final	
80.	The section which reads “The project strategy was duly....” to the end of the paragraph should be deleted and replaced with “Through the PSC it was communicated that the strategy outlined in the project document would not be sustainable. As a result it was recommended that the PAA be “virtual” drawing on the existing expertise from the DMR, Department of Environment and Department of Planning and Environment (Nevis) to form a more coordinated approach to PA management as opposed to the creation of a new entity.”.	Incorporated into final	
81.	The abbreviation “et. al” should be inserted after the Ministry of Legal Affairs.	Incorporated into final	
82.	Clarity is sought as here it is stated that the DOE is using aspects of the financing mechanism but in the first paragraph it states “the finance model and	Incorporated into final	

	institutional structure were not achieved”. If the finance model was not achieved what is being implemented? Do you mean not achieved as envisioned?		
83.	The second sentence in this paragraph should be deleted.	Incorporated into final	
84.	The sentence which reads “The transfer of expert personnel was purported to have resulted in setbacks” should be deleted as this change did not cause an issue for the project.	Incorporated into final	
85.	It is unclear why this work was advanced as the GEF-OFP had articulated from both a sustainability and financial consideration such an agency was not feasible in several PSC meetings and other stakeholder engagements	Incorporated into final	
86.	This point should be revised to “The financial work plans and recommendations are there, but need to be addressed in line with the Finance Administration Act (2007) of the Government of St. Kitts and Nevis and be championed by the Departments of Environment on both St. Kitts and Nevis .	Incorporated into final	
87.	The section which reads “Nevis and St. Kitts” should be revised to “St. Kitts and Nevis”.	Incorporated into final	
88.	Please clarify the significance of the statement “The project coordinator has never seen their conservation plan”	Incorporated into final	
89.	This section which reads “...and the project did not conduct a project implementation plan on them to bring the U.S. dollar number up.” is unclear.	Incorporated into final	
90.	The first 4 sentences of this paragraph “needs to be rephrased. The Federation’s public finance is guided by the Finance Administration Act (2007). Therefore, it was incumbent on the PCU and the Department of Environment to include the Ministry of Finance in the design and develop a mechanism that would meet both parties’ expectations.	Incorporated into final	
91.	The section on line 3 from “Together with the design” to line 15 “The design was not adjusted at this point” should be deleted. The explanation is not accurate. Attempts to blame late start of assignment on the poor performance of the PC is no excuse. The PC failed to heed advice and guidance provided by knowledgeable personnel throughout the implementation period. It should be noted that the signing of documentation to commence implementation does not signify the start of the project as no work commenced prior to the PC coming on board. The PC lacked basic project management skills which along with the failure to heed advice hindered the achievement of objectives which would have been accomplished by revision of logframes, work breakdown structure, communication matrixes and active engagement.	Incorporated into final	

92.	The section which reads "...establishment during implementation of unrealistic legal institutional foundations" is unclear.	Incorporated into final	
93.	This was not an issue and should be removed. When input and decisions were taken by the PSC, these were ignored by the PC and UNDP.	Incorporated into final	
94.	This point is unclear.	Incorporated into final	
95.	With regard to the section which reads "...PA management authority agreements" clarity is sought regarding why this work was advanced after indication was given that the establishment of a separate entity would not be sustainable.	Incorporated into final	
96.	This point should be revised to "The financial work plans and recommendations are there, DOE/DMR must take them forward and undertake discussions with the Ministry of Finance.	Incorporated into final	
97.	The words "within the NIA" should be inserted after the Department of Physical Planning and Environment.	Incorporated into final	
98.	The words "within the NIA" should be inserted after the Department of Physical Planning and Environment.	Incorporated into final	
99.	The abbreviation "GEF" should be deleted from the heading.	Incorporated into final	
100.	The word "political" should be changed to "policy".	Incorporated into final	
101.	The word "operational" on line 5 should be changed to "operationalize". Additionally, the last sentence in this bullet point should be deleted.	Incorporated into final	
102.	Clarity should be provided regarding who is being referred to as the "UNDP Country Team".	Incorporated into final	
103.	The words "within the NIA" should be inserted after the Department of Physical Planning and Environment.	Incorporated into final	
104.	Please site the source for verification for the section which reads "...there was a poverty level of 22 percent and a large percentage of the population....".	Incorporated into final	
105.	The section which reads "Agriculture has been ..." should be revised to "Mono-crop agriculture was". The section which reads "Yet in..." should be revised to "In...".	Incorporated into final	
106.	The section in brackets should be deleted.	Incorporated into final	
107.	The section which reads "...is broad in the country, going from cruise ship tourism to ecotourism" should be revised to "includes cruise tourism to ecotourism".	Incorporated into final	
108.	The last sentence should be deleted. There is no evidence of overfishing.	Incorporated into final	
109.	The section which reads "very briefly portrayed above" should be deleted.	Incorporated into final	
110.	The section which reads "Nevis Peak towers Nevis island" should be revised to "Nevis Peak towers over the island of Nevis".	Incorporated into final	
111.	It is unclear whether this paragraph aims to outline the situation context at project design or the current situation. There is a fundamental misunderstanding	Incorporated into final	

	of organisation, operations and financing for efficiency in a SIDS. No mention is made of the staff hired by the GSKN recruited for under the project e.g. Park Rangers and the role they are now playing in oversight for the CFRNP, the Royal Basseterre Valley National Park and sites on the island of Nevis. This was the situation at project start .		
112.	The word “while” at the beginning of the second sentence should be deleted.	Incorporated into final	
113.	All content from the word “was” in line 1 to “change” in line 4 should be deleted and replaced with the following: “would not be sustainable in regard to the establishment of a PAA nor the creation of a sustainable financing mechanism without the involvement of the Ministry of Finance or adherence to the provisions of the Finance Administration Act (2007)”.	Incorporated into final	
114.	This paragraph should be deleted. This design is not required. The PC’s role is to build relationships with stakeholders and to undertake wide scale engagement. This has not been an issue for other initiatives. In addition the PC was advocated for by some parties despite the limitations in expertise based on the fact that the PC is a Nevisian.	Incorporated into final	
115.	This paragraph should be deleted. This statement is not grounded in fact.	Incorporated into final	
116.	The first sentence should be deleted. Line 3, the words “and in 2016” should be deleted and replaced with “resulting in” also the words “occurred in” should be replaced with “to”. Lines 5 and 6 all content from the word “situated” to “ Development” should be deleted and replaced with “moved along with”. Line 7 the word “which” should be inserted before “ was” and the word “under” should be replaced with the word “to”. Line 8 and 9 from “First” to “MOSD” should be deleted. The role of GEF Operational Focal Point or the fiduciary management of the project remaining in the MOSD has no bearing on the planning or the implementation aspect of the project. The Department of Environment under its new assigned ministry was responsible for moving the project forward. The GEF-OFP ensures proper Public Financial Management as outlined in the Finance Administration Act (2007) and provides oversight as it pertains to proper project and procurement procedures.	Incorporated into final	
117.	The words “as an independent entity “ should be replaced with “from a unit”.	Incorporated into final	
118.	The statement “the under-costed project lacked sufficient resources” should be deleted. The PCU and the Department of Environment were required to identify synergies and very little effort was given to capitalizing on activities which were done by the GSKN which can be counted as co-financing and	Incorporated into final	

	utilize cost savings to advance next steps to make the project more impactful.		
119.	The second sentence which reads “Related were incongruities in the original concept of a system” is unclear. Line 7, the word “Hill” should be inserted after “Brimstone”.	Incorporated into final	
120.	The word “bidder” should be replaced with “buffer”.	Incorporated into final	
121.	The section from “The” to “point” should read “The Senior Director, DEA-PSIP is the GEF-OFP. Line 3, after the word “oversight” insert “as stipulated by the Ministry of Finance in keeping with the Finance Administration Act (2007). The final sentence in the paragraph should be deleted. This has no relevance regarding the rate of implementation of the project. Signatories on the account came from the MOSD and Ministry of Finance as the original signatories were maintained to ensure proper financial management as required by the Ministry of Finance and the supporting Legislation.	Incorporated into final	
122.	The word “political” should be deleted.	Incorporated into final	
123.	The acronym “DPPE” and the word “It” should be deleted..	Incorporated into final	
124.	The word “initial” should be deleted. Line 4, all content after the word “results” in the paragraph should be deleted. Please reference the comment on this matter noted on page 11. Paragraph 3, lines 4 and 5, the sentence beginning with the word “Fatigue” and ending with the word “expertise” should be replaced with “Persons became frustrated as their input was ignored by the PC and UNDP.”	Incorporated into final	
125.	The statement “TE feels”, this assessment cannot be done based on a feeling but based on evidence. Please note that for the last sentence which begins with “There was confusion...” and ends with “... whether GEF, government or UNDP.”, clarity on this matter was provided by the GEF-OFP which was ignored and UNDP procedures were not followed. These issues came as a result of a lack of knowledge of project management techniques by the PC and an unwillingness to heed input from persons with the relevant knowledge.	Incorporated into final	
126.	This paragraph should be deleted. The structure of the PSC was not the issue.	Incorporated into final	
127.	The section from the word “The” to “procedures” should be deleted. This is not a proper explanation for lack of adjustments in M & E for the entire period. Please reassess.	Incorporated into final	
128.	The words “establishment of a Protected Areas Agency” should be deleted. The creation of an independent agency is not a sustainable option. Focus should be given to the arrangement being used by the GSKN and its benefits, although it is not what was envisioned.	Incorporated into final	
129.	The words “procurement and financial management” should be inserted after the word “Restroom”.	Incorporated into final	

130.	The words “within the NIA” should be inserted after the Department of Physical Planning and Environment.	Incorporated into final	
131.	The acronym “DRM” should be replaced by “DMR”.	Incorporated into final	
132.	The section from the word “country” to “work” should be replaced with “proper stakeholder engagement within government was not undertaken to strengthen, create buy-in and demonstrate the financial models possible”. Can t find place exactly but put this in as I agree..	Incorporated into final	
133.	Please reference comment regarding rephrasing outlined on page 11.	Incorporated into final	
134.	Please delete the sentence which reads “That the political implementing contested the agreement on the legal arrangement was central to the broader results.”	Incorporated into final	
135.	The section which reads “... head of the marine resources” should be revised to “Director of the Marine Resources Department”.	Incorporated into final	
136.	The second sentence should be rephrased as referred in similar comments outlined on page 11.	Incorporated into final	
137.	The last sentence is unclear and needs revision.	Incorporated into final	
138.	The number references need to be aligned correctly.	Incorporated into final	
139.	The words “within the NIA” should be inserted after the Department of Physical Planning and Environment.	Incorporated into final	
140.	This point should be revised to “The financial work plans and recommendations that are there must be taken forward and undertake discussions with the Ministry of Finance.”	Incorporated into final	
141.	The word “political” should be deleted.	Incorporated into final	
142.	This point should be deleted. The persons on the Steering Committee were the decision makers for the Project. What is required is a supportive Project Coordinator and GEF Executing Agency that will advance the decisions taken by the Committee.	Incorporated into final	



08/17/20