



Department
for Environment
Food & Rural Affairs

PROBLUE: 2025 uplift to the World Bank's multi-donor marine trust fund

Addendum to an Official Development Assistance Business Case

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for Environment
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ACRONYMS

AA	Administration Agreement
BCR	Benefit-Cost Ratio
B4RAP	Blue Economy for Resilient Africa Program
BBNJ	Biodiversity beyond national jurisdiction
BEDA	Bank-executed Disbursing Activity
BPF	Blue Planet Fund
CBA	Cost-Benefit Analysis
CBD	Convention on Biological Diversity
CMAR	A cross-boundary MPA in the Eastern Pacific
COAST	Climate and Ocean Adaptation and Sustainable Transition
COP	Conference of the Parties
DD	Deputy Director
Defra	Department for the Environment, Food and Rural Affairs
FBC	Full business case
FCDO	Foreign and Commonwealth Development Office
FCV	Fragility, conflict and violence
FFN	Finance for Nature
FiTI	Fisheries Transparency Initiative
FOA	Friends of Ocean Action
G6	Grade 6 (senior position)
GHG	Green House Gas(es)
(KM)GBF	(Kunming-Montreal) Global Biodiversity Framework
GCF	Green Climate Fund
GEF	Global Environment Facility
GFCR	Global Fund for Coral Reefs
GFS	Green Finance Strategy
GOA	Global Ocean Alliance
HAC	High Ambition Coalition
HLP	High Level Panel
HMG	His Majesty's Government
IBW	International Biodiversity and Wildlife
ICF	International Climate Finance
INC	Intergovernmental Negotiating Committee
ISBF	International Sustainable Blue Finance
IUU	Illegal, unreported and unregulated fishing
MEL	Monitoring, evaluation and learning
MDB	Multilateral Development Bank
MFD	Mobilising finance for development
MPA	Marine Protected Area
NbS	Nature-based solutions
OCP	Ocean Country Partnership Programme
OECD	Organisation for Economic Cooperation and Development
ODA	Official Development Assistance
OGD	Other Government Department
REDA	Recipient-executed Disbursing Activity
SDG	Sustainable Development Goal
SLT	Senior Leadership Team

UK	United Kingdom
UN	United Nations
UNEP	United Nations Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change
VfM	Value for money
WACA	West Africa Coastal Areas Management Programme
WTO	World Trade Organisation

A) KEY INFORMATION

Project Name	PROBLUE		
Original Project Objectives	<p>PROBLUE is an Official Development Assistance (ODA) multi-donor trust fund, housed at the World Bank (WB) and funded through the UK's marine ODA portfolio. PROBLUE's ambition is for the blue economy to act as a driver of growth in developing countries and small island developing states (SIDS), maximising the global leveraging power of the World Bank. The programme's overarching goal is to achieve sustainable and integrated development of marine and coastal resources in a healthy ocean by working across four complementary pillars:</p> <ul style="list-style-type: none"> • Sustainable fisheries and aquaculture • Marine pollution • Oceanic sectors (blueing shipping and ports, and other sectors such as offshore wind and desalination) • Seascape management (strengthening integrated and sustainable management of coastal and marine areas, focusing on nature-based solutions, blue carbon and building government capacity to finance the blue economy) <p>Cross-cutting issues, including poverty, livelihoods, social inclusion (with a focus on gender), climate change, and maximising finance for development, are interwoven throughout the programme.</p>		
Reasons for change	<p>The UK contribution to the programme is due to end in March 2026. A costed extension up until the end of FY26/27 is requested. Total approved funds for PROBLUE (£37.5m) have now been disbursed, with further funds requested of up to £12 million to ensure continued impact across PROBLUE themes of delivery until March 2027.</p>		
Budget and Whole Life Cost	Original Amount £m	Revised Amount £m	Change Amount £m
	£37.5	£49.5	£12
Project Start & End Date	Original start date	Original end date (Project closure)	Amended end date (Project closure)
	October 2021	31 st March 2026	31 st March 2027

Other projects/ Programmes impacted by change	None
Is the change Novel or Contentious	Neither the original programme or requested changes are novel nor contentious.
DevTracker link to original business case	PROBLUE-business-case-clean_DT_2-20240524090546.pdf

B) KEY DIFFERENCES (CHANGES TO THE ORIGINAL FULL BUSINESS CASE)

Strategic Case	Updated to capture the strategic rationale to support the proposed uplift, including changes to the UKHMG policy landscape and developments within the fund since the FBC was approved in 2021
Economic Case	<p>Updated to include findings from Defra-led Annual Reviews, and appraisal of the World Bank's approach to delivering Recipient Executed projects, which indicate there is a case for the uplift to be VfM based on:</p> <p>(1) early data and modelling is on track to achieve expected outputs;</p> <p>(2) unmet demand for further support.</p> <p>Benefit Cost Ratio (BRC) is 2.24-5.76, which is slightly lower compared to the initial assessment of 2.31-6.12. This reflects updated modelling inputs such as inflation adjustments, carbon pricing, exchange rates, and GDP deflator.</p> <p>The updated BCR continues to indicate very high value for money, although this is estimated based on modelling. Outcome-level data is currently limited due to the early stage of delivery and the time required for Recipient Executed Disbursement Activity (REDA) projects to generate measurable results.</p>
Commercial Case	Minimal changes.
Financial Case	Updated to present revised spend profile and accounting officer tests, alongside high-level PROBLUE budgetary workplan for the next year.
Management Case	Updated to reflect the role the UK has played in shaping PROBLUE's direction as a major donor and former co-chair of its Partnership Council, influencing priorities such as scaling country-led REDA projects, embedding Gender Equity Disability and Social Inclusion (GEDSI) and Prevention of Sexual

Exploitation Abuse and Harassment (PSEAH) standards in project design, and strengthening donor coordination.
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C) INFORMATION

i. What is the programme background and strategic objectives?

PROBLUE supports growth of blue economies globally to reduce poverty in coastal communities while maintaining a healthy ocean. It particularly focuses on job creation, inclusive economic growth and improved, more diverse livelihoods which help to build resilience and adaptation to climate change impacts while preserving marine natural resources. It operates through four complementary pillars (below). Across these pillars, PROBLUE mainstreams gender equality and social inclusion (GESI) - particularly for women, youth, and marginalised groups who are most dependent on marine resources.

1. **Fisheries and aquaculture** (improving management to address overfishing and strengthen aquaculture sustainability);
2. **Preventing and managing marine pollution** (addressing threat of litter, plastics and other land-based pollution);
3. **Oceanic sectors** ('blueing' traditional and novel oceanic sectors to limit adverse impacts on ocean health), and;
4. **Integrated seascape management** (making management of coastal and marine areas more sustainable and more integrated).

UK financial support to PROBLUE has increased over time. The original Full Business Case (FBC), approved in September 2021, allocated £25 million over five financial years, with the first year (£6 million) secured through the Spending Review. In 2023, a Change Control Note (CCN) was approved by Investment Committee and increased the UK contribution by £12.5 million, bringing the total commitment to £37.5 million, all of which has been disbursed from FY21/22 to FY24/25. The original FBC also noted that the UK may consider further increases depending on programme results.

Through the current CCN, Defra seeks approval for an additional £12 million uplift, taking the UK's total support to £49.5 million over seven years. This extension does not alter the programme's strategic objectives but provides additional capacity for PROBLUE to meet recipient country demand and ensures continuity in the delivery of Defra's ODA portfolio during a phase of extended business planning.

Table 1: PROBLUE uplift history

Year / Change	Uplift Value	Total Programme Value	Funding Period
Original Value	£25m	£25.0m	FY21/22 – FY25/26
2023 Uplift	£12.5m	£37.5m	FY21/22 – FY25/26
2025 Pending Uplift	£12m	£49.5m	FY21/22 – FY26/27

ii. What is the reason for change?

An uplift to PROBLUE and an extension of the contribution agreement by 12 months, is justified on strategic, economic and performance grounds.

Timing

- The UK can maximise the opportunity to invest into Recipient-Executed Disbursing Activity (REDAs) projects and therefore support recipient government's ability to drive their own development priorities in the marine space. REDAs are co-designed and implemented by recipient countries and aligned with national policies and priorities for sustainable blue economies. PROBLUE operates through a dual model of Bank-Executed Disbursing Activity (BEDA) projects and REDAs, but the opportunity to invest in REDAs is diminishing in the next 12 months, due to a reduced window for delivering them before the planned closure of the fund (currently 2030).
- Recipient country demand for financing their blue growth outstrips the Fund's current resources. To take advantage of the shift to systemic support through REDAs, whereby countries use PROBLUE funds to unlock larger public financing through IDA / IBRD to drive national priorities, we need to signal confidence in PROBLUE. A further uplift provides this confidence and helps attract new donors, including non-sovereign donors (private sector, philanthropy).
- UK contributions to date to PROBLUE have laid the groundwork for successful REDA implementation by supporting policy frameworks, capacity building, and technical assistance and partnerships with the WB, delivered via BEDA's. This foundation increases the likelihood of REDA success and further strengthens partnerships with the World Bank.
- In addition, the groundwork of the BEDAs means there is a ready-made pipeline of REDAs approved for financing – for example, a REDA building on successful implementation of phase 1 of Unleashing the Blue Economy of the Caribbean (a priority geographical region for UK ODA)
- An uplift at this stage will ensure uninterrupted ODA delivery through an extended business planning phase (Q2 25/26–Q3 26/27), consistent with the Blue Planet Fund (BPF) Theory of Change and PROBLUE's strong Annual Review performance (consistent A ratings). Continuity during a phase of significant programme planning will retain momentum and quality of partnerships for the BPF, with potential to more efficiently incorporate PROBLUE into the new Blue Finance portfolio of programmes in April 2027. Integration and further funding to PROBLUE would however, be subject to outcomes of the scoping and evidence for this new Blue Finance Business Case.

Aligned with UK priorities

- PROBLUE supports UK domestic priorities by addressing global biodiversity loss and ecosystem collapse risks, as highlighted in the recent Joint Intelligence Committee report. Its work with vulnerable coastal communities helps reduce poverty and displacement, aligning with UK migration and security goals. By promoting sustainable aquaculture and fisheries, PROBLUE contributes to UK food security and resilient supply chains. It also advances UK environmental targets, such as those in the Environmental Improvement Plan 2023, through international efforts to reduce marine pollution and plastic waste.

- PROBLUE strongly aligns with the UK’s partnership approach to development. Working with client countries, the World Bank produces tools and strategic and policy products to enable investment into the blue economy. For example, the recently published *Accelerating Blue Finance: Instruments, Case Studies, and Pathways to Scale* examines actions for national governments, private sector, development institutions and multilaterals to mobilise greater flows of capital and create more jobs for a sustainable blue economy. REDA projects are the next phase, whereby funds are directly controlled, managed and disbursed by the recipient country in line with their national priorities, e.g. growth, food security, and guided by evidence-based tools and policies.
- PROBLUE has a strong catalytic effect. In FY24/25, every \$1 invested in PROBLUE-supported activities informed \$151 in World Bank financing¹. To date, 14 PROBLUE REDAs have been approved, with \$60m of PROBLUE grants, which **has generated over \$2 billion in co-financing from IDA/IBRD**.
- Maintain strong momentum on aligning the portfolio with Defra’s ODA requirements for GEDSI and PSEAH.
- Investing in PROBLUE signals UK commitment to effective multilateral action. As the World Bank’s flagship blue economy fund, PROBLUE offers strong catalytic impact. It is also backed by unanimous Board support and nearly doubling of blue economy funding within WBG since 2020 indicates strong support to this agenda within World Bank. While early analysis suggests HMG may reduce vertical fund contributions, this does not necessarily mean a shift to more core contributions to MDBs. Continued support to PROBLUE Multi Donor Trust Fund reinforces UK commitment to a neglected but vital area of climate action, which is supported by WBG.

iii. What is the total and additional funding required?

Currently the total funding is £37.5 million, and the additional sum requested is £12 million over two years, identified as the preferred option (Option 2) in the Economic Case below. To create ability to spread this uplift over two years, an extension of 12 months to the FBC and the contribution agreement with the WB is also requested, taking closure of the programme from March 2026 to March 2027. The uplift is affordable under the allocation to the BPF from the 2025/26 single year spending review, and the 26/27- 28/29 multi-year spending review. Flexibility may be required on the final value of the 26/27 budget as there are wider dependencies across the BPF portfolio. The options presented however are the preferred option for PROBLUE. The spend is expected to be 100% RDEL and approximately 96% classified as ICF spend.

Table 2: Revised spend profile for PROBLUE

	FY21/22	FY22/23	FY23/24	FY24/25	FY25/26	FY26/27	Total
Original spend profile (at time of BC approval)	£6m	£4.75m	£4.75m	£4.75m	£4.75m	/	£25m
Actual spend profile (to date – following 2023 uplift)	£8m	£14.75m	£7.25m	£7.5m	/	/	£37.5m

¹ In the context of PROBLUE, the term “inform” is typically used in the sense of guiding or shaping decisions, policies, or investments based on evidence, knowledge, or analysis.

Spend profile with requested uplift subject to approval	£8m	£14.75m	£7.25m	£7.5m	£8m	£4	£49.5m
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* Indicates remaining spend

iv. Summary of performance to date

Defra's Annual Reviews on PROBLUE have scored an 'A', meaning PROBLUE is meeting objectives. This assessment is based on reported activity rather than performance against targets or milestones, as PROBLUE does not currently set annual targets, instead it uses end line targets. Strengths include mobilising finance, building political and national ambition, and producing influential knowledge products. Areas for improvement include clearer results tracking and greater visibility of impacts on communities.

Table 3.1: Selected outputs delivered by PROBLUE in FY23/24

Output	Indicator	Example	Reported Delivery
1 Advancing Blue Economy Action in Partnership	# of workshops, trainings and consultations conducted	Developing a clean and resilient blue economy in Morocco and Tunisia ²	Delivered 917
1.2 -Driving gender equality and social inclusion in the Blue Economy	Participants who were women (%)	Inclusion of women in coastal fisheries and tourism training programmes	Delivered 45%
2 Accelerating knowledge for the Blue Economy	# of tools developed	Analysing the effects of policies on plastic pollution in the Philippines ³	Delivered 49
4 Informing decision making for the Blue Economy	# of knowledge products prepared	Designing national data collection systems in Somalia ⁴	Delivered 212

Progress Against Outcome Indicators and REDAs

PROBLUE continues to demonstrate strong progress against REDA outcome indicators, significantly scaling up financing for sustainable blue economy initiatives.

- **Development financing informed by PROBLUE** has reached US\$4.44 billion (FY19–24), including US\$3.18 billion in FY24 alone — a 2.5-fold increase on the previous

² PROBLUE's support is focused on strengthening an analytical base for blue economy development. This activity informed strategic investments and policies to support the development of a clean and resilient blue economy. Regionally, the activity included workshops and training related to blue economy development and marine plastic pollution, and a rapid regional blue carbon assessment and communications toolkits.

³ PROBLUE supported the creation of the Plastic Policy Simulator, which assesses the effects of plastic-related policies and economic tools on marine plastic pollution in the Philippines.

⁴ PROBLUE has is supporting the development of interactive knowledge products, data portals, and outreach activities related to blue biodiversity. In Somalia, PROBLUE supports the design of a national data collection system, using mobile technologies to collect data and statistics at landing sites and transmit them to a centralized Fisheries Information and Management System in near-real time.

period. Applying Defra's 17% attribution, this equates to around US\$754 million influenced through UK support.

- **IDA/IBRD financing** for blue economies has doubled to US\$1.94 billion, while client financing rose sharply to US\$2.24 billion, reflecting stronger government commitment and ownership.
- **Private financing** for blue economies as a result of PROBLUE REDAs increased from US\$4 million to US\$73 million, indicating growing market engagement in sustainable aquaculture and coastal investment.
- The **influence ratio** improved from \$39 to \$151 in FY24, with a cumulative average of \$62 leveraged per PROBLUE dollar, demonstrating high value for money.
- **US\$60 million** has been mobilised directly for blue economy projects, primarily public financing supporting initiatives such as the West Africa Coastal Areas Program (WACA) and the *Caribbean Regional Oceanscape Project*.

Across all activities, an independent Mid-Term Review (KPMG, 2022) confirmed PROBLUE's relevance, efficiency, and effectiveness, highlighting strong leverage of donor funds and potential to scale up, while recommending stronger reporting and closer links between global knowledge and country-level delivery. The World Bank's Independent Evaluation Group (IEG) "Making Waves" evaluation recognised PROBLUE's catalytic role in shaping policy, mobilising co-finance, and integrating work across the blue economy, while urging stronger measurement of long-term impacts on poverty, biodiversity, and climate adaptation.

PROBLUE is a high-performing programme with clear added value and opportunities for further strengthening—areas the UK can support through finance and technical input, exemplified by the joint refresh of the M&E framework in September 2023 to improve reporting on fund performance. A visit to Indonesia in early 2025 concluded that the large-scale REDA Oceans for Prosperity ('LAUTRA) would not have happened without PROBLUE's \$5 million grant, which unlocked US \$210 million in national finance and IBRD funding.

PROBLUE also supported enabling conditions and institutional support for the LAUTRA project, including the establishment of a Blue Finance Advisory Committee (BFAC), fostering cross-sector collaboration and strengthening Indonesia's regional leadership in green investing. These outcomes demonstrate how PROBLUE can provide financial leverage, governance structures, and strategic capacity-building to unlock substantial investment in sustainable blue economies aligned with national priorities.

v. **What are the additional benefits of the budget or other changes?**

The proposed uplift of £12 million across FY25/26 and FY26/27 will support country-led interventions through PROBLUE's Recipient Executed Disbursal Activities (REDAs). REDAs are the mechanism through which PROBLUE translates funding into tangible, country-led interventions — for example, supporting sustainable fisheries, coastal livelihoods, and blue financing initiatives such as blue carbon markets. These activities have demonstrated strong catalytic value, often unlocking multiple times their initial investment in national or regional financing. By investing now, we can ensure that these pipeline REDAs become investment-ready and start delivering outcomes well within the fund's operational window (up to 2030).

PROBLUE has a strong role in advancing sustainable, private-sector-driven blue economy development, exemplified by Indonesia's high-profile Coral Bond which seeks to raise \$200

million per year to fund marine conservation areas. In FY25, PROBLUE supported the application of 14 measures that created an enabling environment for private investments in the blue economy. For example, the Plastic Leadership Platform (PLP) in Sierra Leone enables public-private engagement on plastics management. In FY25, 71 percent of PROBLUE activities have specific data and analytics on maximizing finance for development.

The proposed uplift is expected to deliver additional benefits due to ongoing demand exceeding current funding and monitoring data showing progress on key outputs, suggesting potential to expand economic benefits forecasted in the original business case.

Expected benefits, to be assessed through MEL processes, include:

- Reduced poverty and improved livelihoods through aquaculture and coastal tourism
- Marine environmental improvements via reduced plastics and ghost gear
- Climate mitigation through pollution reduction and habitat protection
- Climate adaptation and resilience through improved habitat management
- Improved health and wellbeing through cleaner environments and healthier fish produce.

These benefits are based on PROBLUE's Theory of Change and expected pathways to impact (see Figure 1, Annex A).

vi. What is the approach to implementation?

The overall approach remains consistent with the FBC, showing strong portfolio growth and adjusted spending by pillar in response to client-country demand. As of June 2025, PROBLUE has supported 286 activities across 100+ economies, with cumulative allocations of \$219 million. The World Bank's blue economy portfolio has nearly doubled since 2020, rising from \$5.9 billion to \$10.5 billion in 2024, reflecting growing global demand for sustainable ocean investments.

To date, most activities have been implemented through Bank-Executed Disbursal Activities (BEDAs), focused on knowledge generation, strengthening institutional capacity, and piloting tools. However, PROBLUE is increasingly scaling up Recipient-Executed Disbursal Activities (REDAs) to enable direct country implementation. Rationale for support for REDA's is noted above.

Investing now is therefore critical to ensure countries can drive delivery of national marine development priorities. Geographical allocations across all scenarios remain aligned with World Bank development priorities, with Africa receiving the largest share. This approach aligns with UK ODA geographical prioritisation, with the following countries supported through PROBLUE REDA financing projects at present: Tanzania, Somalia, Ghana and Indonesia.

vii. **Describe any key changes to the original business case including the Theory of Change or new evidence from ongoing monitoring, evaluation or learning work.**

Unless otherwise stated, it should be assumed that all original business case content remains the same. The original FBC can be located on DevTracker⁵.

viii. **Case for the uplift**

This section details the **Strategic, Economic, Financial, Commercial** and **Management** case for uplifting the funding and extending PROBLUE.

1. Strategic Case

Strategic alignment and case for an uplift

The strategic case from the original FBC remains relevant. Investment into PROBLUE continues to contribute to the UK's ICF Nature spend targets (~96% classed as ICF), commitments under the Paris Agreement and the strategy to reach Net Zero. PROBLUE provides direct support for countries to engage with and implement new international environmental agreements that the UK are committed to, including Biodiversity Beyond National Jurisdiction (BBNJ) and a new legally binding instrument on plastic pollution.

Timing of the uplift

PROBLUE catalyses major World Bank investments by providing targeted, early-stage technical assistance that enables Recipient-Executed Disbursal Activities (REDAs)—country-led programmes that drive marine development priorities. Bank-Executed Disbursal Activities (BEDAs), in turn, identify opportunities, build capacity, and prepare the groundwork for REDAs. REDAs are critical because they are implemented and managed directly by recipient governments, strengthening ownership and reducing borrowing costs by de-risking larger investment operations. They focus on growth, job creation, and private-sector mobilisation in the blue economy, in line with the UK's shift to a partnership development approach that prioritises country-led systems support. To date, 14 PROBLUE REDAs worth \$60 million (28% of total fund spending) have mobilised over \$2 billion in co-financing from IDA/IBRD for recipient countries to drive their own marine development priorities, showing exceptional leverage. In FY2024/25, five new REDAs worth \$21.4 million generated \$407.5 million in co-financing—compared to \$25.7 million for 36 BEDAs, highlighting their greater catalytic impact.

Demand for REDAs continues to outstrip current resources. Examples of REDA impact include:

- Indonesia – “Oceans for Prosperity” (LAUTRA): A \$5m PROBLUE grant unlocked \$210m in IBRD finance, supporting marine protected areas, sustainable fisheries, and

⁵UK contribution to the World Bank Group PROBLUE Programme to facilitate sustainable finance for healthy oceans, 2021. <https://devtracker.fcdo.gov.uk/programme/GB-GOV-7-BPFPROB/documents>

local livelihoods. It also established the Blue Finance Advisory Committee (BFAC), strengthening national coordination and leadership in blue finance.

- Caribbean: \$6m of PROBLUE support helped shape a \$56m regional investment—the first of its kind—covering blue economy roadmaps, plastics management, and tourism strategies.
- West Africa & São Tomé and Príncipe: A \$5.8m contribution to WACA unlocked \$200m in coastal resilience investments, while \$5m in São Tomé and Príncipe supported the country's first National Blue Economy Strategy, advancing sustainable fisheries and inclusive livelihoods.

Given the limited window before 2030 allocating up to £8 million of the proposed uplift in FY2025/26 would accelerate REDA delivery.

Alignment with UK priorities

Domestic priorities

PROBLUE's core aim of alleviating poverty and supporting vulnerable coastal communities through increased economic opportunities also helps to alleviate the drivers of increased displacement and migration globally, supporting domestic UK priorities around this issue. PROBLUE's core work on sustainable aquaculture and fisheries also contribute to UK food security and robust supply chains through helping to ensure resources are not over exploited. The Environmental Improvement Plan 2023 reinforces commitments to eliminate plastic waste and tackle pollution—areas where PROBLUE directly supports UK goals through international marine pollution reduction efforts.

Catalytic potential

PROBLUE delivers exceptional leverage: in FY24/25, every \$1 invested informed \$151 in World Bank financing. To date, 14 REDAs worth \$60m have generated over \$2 billion in co-financing from IDA/IBRD. This financing creates jobs and economic growth in sectors such as tourism and fisheries, which have significant multiplier effects — for example, each seafood job supports up to three indirect jobs in processing, packaging, and distribution. PROBLUE supports emerging industries such as seaweed farming, with a recent report estimating market potential of up to US\$11.8 billion by 2030. Further UK investment would enable scaling of initiatives that such as seaweed business incubation through the current Tanzania REDA, which focuses on empowering women seaweed farmers with access to climate-resilient technologies and financing mechanisms to grow their businesses.

ODA priorities

PROBLUE aligns closely with the UK's evolving partnership approach — shifting from donor to investor and from service delivery to system support. For example, in Tanzania, a \$5m PROBLUE grant unlocked a \$112m IDA loan to support women seaweed farmers, establish a national blue carbon market, and strengthen ocean governance through marine spatial planning. These interventions enhance blue carbon financing, create jobs, and promote private-sector investment in sustainable fisheries and aquaculture value chains. The World Bank produces tools and strategic and policy products to enable investment into the blue economy. For example, the recently published *Accelerating Blue Finance: Instruments, Case Studies, and Pathways to Scale* examines actions for national governments, private sector, development institutions and multilaterals to mobilise greater flows of capital. PROBLUE-

supported **Pacific Ocean Advisory Program (POAP)** has also provided crucial analytics for over US\$250 million in World Bank projects so far in **Fiji, the Federated States of Micronesia, the Marshall Islands, the Solomon Islands, Tonga, Tuvalu and Kiribati**- a region the BPF has a relatively low footprint in to date. Such analytics include an economic valuation of coral reefs, a nature-based solutions assessment, and a fisheries public expenditure review.

PROBLUE directly contributes to poverty reduction, co-financing projects that deliver tangible benefits for vulnerable coastal communities. In FY24, PROBLUE-supported operations reached 36,000 beneficiaries, including 14,855 women. Results include improved fisheries infrastructure, greater protection against coastal erosion and flooding, and expanded access to finance and training for small businesses. Examples from Cabo Verde and the Caribbean show how blue finance supports women-led SMEs, artisanal fishers, and low-income households—linking marine investment to inclusive economic growth. PROBLUE continues to align with Defra’s ODA requirements for GEDSI, with strengthened mainstreaming of inclusion within programme. For example, more than 1.5 million people (46% women) are expected to benefit from ongoing World Bank projects co-financed by PROBLUE, such as the West Africa Coastal Areas (WACA) Resilience Investment Program and the Caribbean Regional Oceanscape Project, which both embed gender-responsive approaches and inclusive livelihood opportunities for coastal communities.

The World Bank continues to integrate and strengthen its approach to PSEAH through PROBLUE. A typical example is the Mozambique Coastal and Marine Resilience Project, which incorporates dedicated PSEAH risk assessments, community awareness campaigns, and grievance redress mechanisms to encourage safe and equitable participation.

Multilateral action

Effective multilateral action is a focus for the UK, particularly where investment is into a high performing fund that reinforces broader commitments. For example, the World Bank has demonstrated its support through unanimous Board of Directors support for a recent Independent Evaluation Group (IEG) blue economy evaluation, and an almost doubling since 2020 of support to blue economy within WBG from \$5.9m in 2020 to \$10.5 in 2024. Initial analysis within HMG suggests we are moving to reduce contributions to vertical funds (e.g. CIF, GCF) but this does not necessarily mean a shift to more core contributions to MDBs. Continuing to support the World Bank’s flagship Blue Economy Trust Fund, with excellent catalytic potential, is a strong demonstration of effective multilateral action and signals UK commitment and leadership on the ocean. This approach also supports the Multilateral Development Bank nature reform agenda, which mirrors UK priorities to:

- Scale up concessional climate and nature finance.
- Integrate climate and development goals into core operations.
- Increase support for global public goods such as biodiversity, ocean, and climate resilience.
- Use capital adequacy reforms to expand financing capacity.

By delivering nature-positive ocean governance finance, PROBLUE demonstrates how MDBs can advance global public goods while strengthening economic resilience in developing countries.

Value for Money

PROBLUE delivers excellent VfM and remains a strategic use of UK ODA and nature finance. In FY24/25, every \$1 invested informed \$151 in World Bank financing. Though attribution is complex, PROBLUE's catalytic effect on private and public co-finance is well evidenced. Independent evaluations and Defra Annual Reviews confirm the fund's ability to multiply donor resources and improve the design, sustainability, and impact of large-scale investments.

Beyond leverage, PROBLUE enhances project quality by embedding expertise on marine biodiversity, climate resilience, gender inclusion, and blue economy policy, ensuring investments are more effective and equitable. The programme has consistently achieved 'A' ratings in Annual Reviews, with early evidence indicating strong progress toward outcomes and impacts.

What support will the UK provide?

An uplift of up to £12 million ODA funding across FY25/26 and FY26/27 would:

- Represent 32% of the original business case and 21% of the whole-life grant value.
- Increase ability of the fund to implement Recipient Executed Disbursal Activities
- Increases the UK's share of PROBLUE funding (~28%), signalling multilateral commitment to the ocean and bolstering the World Bank's commitment to sustainable blue economic growth.
- Contribute to the UK's 2025/26 targets for ICF Nature spend.

Non-financial support would include:

- Participation in two PROBLUE Partnership Council meetings per year, input to annual work plans and collaborative work to address Annual Review recommendations.
- Policy and technical input from Defra teams to PROBLUE annual work plans, their Global Engagement Forum agenda, communication and visibility strategies and GEDSI and SEAH action plans; contributing to shaping of the fund using latest science and UK policy priorities.
- Increased visibility of PROBLUE's activities, side events and publications through Defra's own communications and engagement at international forums.
- Recommendations on knowledge exchange and alignment with other environmental trust funds, including Global Programme on Sustainability (GPS) and the Energy Sector management Assistance Programme, (ESMAP) MDTF.
- Demonstration of renewed commitment to the fund to other donors, and support to realise programme impacts within the operational window of the fund.

Strategic risk management

Delivery through PROBLUE is governed by the World Bank Group's (WBG) robust systems for risk, fiduciary control, procurement, and safeguards, which provide strong assurance. The last Central Assurance Assessment (CAA) in 2022 (not public) found no unacceptable fiduciary or reputational risks. Programme risks are reviewed biannually by donors through the Partnership Council, with ongoing improvements to risk reporting following the 2024

Annual Review recommendation. All PROBLUE project-level risk reports are publicly available through World Bank documentation in the form of Public Appraisal Documents.

Defra maintains close engagement with the PROBLUE team, enabling strategic influence and ensuring alignment with the Blue Planet Fund portfolio. The large and diverse portfolio—286 activities across 100+ economies—carries inherent operational uncertainty given dynamic environmental, political, and economic contexts. However, the World Bank has extensive experience in anticipating and managing such risks and remains responsive to donor input on strategies and work plans.

Global instability and declining ODA budgets pose risks to future PROBLUE and IDA/IBRD funding. To mitigate this, the World Bank and donors are pursuing new financing sources, including private and philanthropic contributions, and leveraging links across related funds (e.g. PROGREEN, GPS). Defra continues to use its position to encourage new donor participation.

Residual risks are mitigated through PROBLUE’s adaptive management and clear 2030 Business Plan. Secretariat resourcing is currently adequate, though Defra will monitor staffing, particularly around PSEAH coordination, given shrinking sovereign donor contributions.

The latest CAA confirmed WBG compliance with international best practice on anti-money laundering and counter-terrorist financing. Defra and FCDO will continue to engage with the Secretariat to ensure appropriate risk reporting and oversight. Strategic and programme risk appetite remains open, with safeguarding, delivery, and financial risks covered in accompanying assurance documents.

2. Economic Case

Previous investment decisions

At Full Business Case (FBC) stage, six options were considered, including a do-nothing option. PROBLUE the preferred option based on alignment with BPF criteria and critical success factors. A medium ambition investment of £25 million was approved.

In Autumn 2023, a Change Control Note approved an additional £12.5 million on the basis of strong demand for PROBLUE support, positive performance against expectations, and good value for money.

Table 4: CCN 2023 economic benefits appraisal

Model Version	Net Present Value	Benefit-Cost Ratio
Full Business Case – CBA £25m (CCN 2023 update)	Low: £31.7m High: £123.7m	Low: 2.3 High: 6.2
CCN 2023 – CBA £37.5m	Low: £43.8m High: £170.7m	Low: 2.3 High: 6.2

PROBLUE Results and Performance to Date

The output and outcome results that PROBLUE has achieved from the UK's investment indicate strong performance across the programme, most notably the estimated \$62:1 influence ratio, and the \$58 million of finance that has been mobilised as a result of Defra's investment. Other results include:

Table 5: PROBLUE output results to date (PROBLUE Annual Report 2024) – Defra attributed (17%⁶ attribution)

Indicator	Results FY19-23	Results FY24	Cumulative results to date
Policies, regulations, strategies, or plans informed by PROBLUE (#)	5	4	10
Capacity building events: workshops, trainings, and consultations conducted (#)	73	46	119
Participants of capacity building events and consultations (#)	885	1,285	2,170
Knowledge products prepared (#)	55	36	91

Table 6: PROBLUE outcome results to date (PROBLUE Annual Report 2024) – Defra attributed (17% attribution)

Indicator	Results FY19-23	Results FY24	Cumulative results to date
Development financing informed by PROBLUE (\$)	\$1,258,000,000	\$3,179,000,000	\$4,437,000,000
<i>of which IDA and IBRD financing (\$)</i>	\$969,000,000	\$969,000,000	\$1,938,000,000
<i>of which client financing (\$)</i>	\$137,000,000	\$2,108,000,000	\$2,244,000,000
<i>of which private financing (\$)</i>	\$4,000,000	\$73,000,000	\$77,1000,000
<i>of which other financing (\$)</i>	\$154,000,000	\$35,000,000	\$187,000,000
Influence ratio: World Bank financing of informed operations / PROBLUE support (\$)	\$39	\$151	\$62
Total World Bank (IDA/IBRD) financing of operations cofinanced by PROBLUE (\$)	\$272,000,000	\$11,000,000	\$283,000,000
Financing mobilized that contributes to advancing the blue economy (\$)	\$51,000,000	\$9,000,000	\$60,000,000
<i>of which public financing</i>	\$51,000,000	\$7,000,000	\$58,000,000

⁶ Defra attribution is 17% reflecting total funding-to-date divided by total PROBLUE signed contributions.

Poverty reduction results and targets

Whilst PROBLUE does not directly deliver poverty-focused interventions, the Mid-Term Review confirmed that it plays a catalytic role through technical assistance and knowledge products that unlock and improve delivery of large blue finance investments that support vulnerable communities. PROBLUE is integral to achieving shared prosperity and ending extreme poverty.

PROBLUE has had success against its poverty reduction goals to date, with stronger results expected over the coming years. The 2025 Annual Report concluded that in World Bank FY25:

- 100% of PROBLUE-informed investments contribute to alleviation of poverty.
- 96% of PROBLUE activities include gender dimensions
- 14 measures were applied to improve the enabling environment for private investments. In addition, more than \$63 million financing was mobilized aside from regular World Bank operations, of which almost \$2 million was private and \$61 public financing.

Limitations to assessing performance to date

As many REDAs are still in early implementation, reporting on key outcome indicators is not yet available. These include greenhouse gas emission reductions, reduced plastic leakage, increased fisheries value, reduced coastal vulnerability, and improved marine and coastal management. Comprehensive data is expected from 2026, which will enable a more robust assessment of progress against long-term targets.

5 Es Assessment

The following summarises updates to the 5Es assessment. While PROBLUE demonstrates strong performance in areas such as economy, efficiency, and equity, limited data on effectiveness means a conclusion on cost-effectiveness cannot be drawn at this stage.

Economy: PROBLUE adheres to World Bank guidelines, including the Procurement Framework, Procurement Regulations for Investment Projection Financing Borrowers and the Project Procurement Strategy for Development. Projects co-financed by PROBLUE are expected to provide their procurement plans as well as financial information for publication on the World Bank website, increasing the transparency and accountability of project finances.

Efficiency: The Mid-Term Review concluded that PROBLUE is efficient, concluding that it is on track to meet its objectives and that PROBLUE had taken action to improve efficiencies in process. The move to REDAs should lead to efficiency gains by placing greater emphasis on in-country implementation where local delivery expertise is at the forefront.

Effectiveness: It is too early to assess its effectiveness at converting inputs to outcomes and impact. PROBLUE have strengthened its MEL approach with a new M&E Plan with a developed set of indicators and methods. This framework should strengthen the accountability of projects alongside ongoing work to set proportionate targets.

Equity: Evidence from the PROBLUE Annual Report 2024 shows positive impacts (such as upskilling, training and employment opportunities) for women and people from

disadvantaged groups, and this is reflected in the targets for several indicators. A recent trip to Indonesia showed the potential for significant benefits to women, with strong representation in MSMEs, additional training support, and support for incentives for sustainable livelihoods being enabled by PROBLUE.

Cost-effectiveness: PROBLUE is well designed and has the potential for strong benefits against key environmental and social outcomes. However, due to limited outcome and impact data, a full assessment of cost-effectiveness cannot yet be made.

Options Appraisal

The following options are considered for this appraisal:

- **Do-Nothing** (i.e. maintain total programme funding at £37.5 million)
- **Option 1:** Uplift investment by £7 million (i.e. increase total funding to £44.5 million) and over two years (with £4 million committed during FY25/26, and £3m committed during FY26/27)
- **Option 2:** Uplift investment by £8 million during FY25/26 and FY2026/27 (i.e. increase total funding to £45.5 million)
- **Option 3 (preferred):** Uplift investment by £12 million (i.e. increase total funding to £49.5 million) over two years

Table [x]: Comparison of monetary benefits across assessed Options

	Option 1: £7 million total		Option 2: £8 million total		Option 3: £12 million total	
	Lower	Upper	Lower	Upper	Lower	Upper
NPC	£48.2m	£48.2m	£49.5m	£49.5m	£53.1m	£53.1m
NPB	£108.0m	£277.7m	£111.0m	£285.3m	£119.0m	£305.9m
NPV	£59.8m	£229.5m	£61.5m	£235.8m	£65.9m	£252.8m
BCR	2.24	5.76	2.24	5.76	2.24	5.76
<i>Additional NPC</i>	£6.9m	£6.9m	£8.0m	£8.0m	£11.8m	£11.8m
<i>Additional NPB</i>	£15.0m	£38.5m	£17.9m	£46.1m	£25.9m	£66.7m
<i>Additional NPV</i>	£8.3m	£31.8m	£9.9m	£38.1m	£14.4m	£55.1m

Options 1–3 have been appraised using the cost-benefit model developed for the FBC and updated in the 2023 Change Control Note. Outcome and impact data remain limited, as most REDA projects are in early implementation. The updated BCR range (2.24–5.76) reflects inflation and macroeconomic adjustments but remains assumption-based. While this introduces uncertainty, it represents the best available estimate based on current data.

The **monetised benefits** forecasted include reduced plastic leakage to the marine environment, greenhouse gas emission reductions resulting from decreased plastic waste, and increased production value from sustainable aquaculture.

The **unmonetised benefits** of PROBLUE include improvements to the marine environment through reduced ghost gear, climate mitigation via increased protection of marine ecosystems, poverty reduction and livelihood enhancement through coastal tourism, strengthened climate resilience and food security, and improved health and wellbeing through greater inclusion of local communities in decision-making processes.

Investment in REDAs

While the **benefits of REDAs** cannot yet be fully quantified, they are expected to play a critical role in delivering both monetised and unmonetised outcomes more effectively. REDAs are considered to offer high value for money due to their time-sensitive nature and stronger in-country impact aligned with national priorities. This is expected to enhance efficiency, effectiveness, and impact. However, the additional impact cannot currently be quantified or monetised due to limited available data. REDAs have the potential to:

1. Increase the level and depth of intervention impact at national and regional levels and help to ensure sustainability of an operation by providing multi-year funding for specific Blue Economy activities, including policy reforms and mainstreaming environmentally and socially sustainable practices into the public and private sectors;
2. Support countries to expand public investment to address global commitments such as within the Global Biodiversity Framework, BBNJ, the WTO Agreement on Fisheries Subsidies, and the forthcoming International Legally Binding Instrument (ILBI) to End Plastic Pollution; and
3. Enhance the enabling environment for private sector investment, in areas such as aquaculture, to increase the ambition for better environmental and social outcomes including on GEDSI.

The higher spend in FY25/26 enables greater support for REDAs and would allow the UK to respond to high demand for REDA co-financing - see pipeline table below.

Table [x]: PROBLUE REDAs formally in the pipeline

Region	Country	Project	Required PROBLUE contribution	Comment
Africa West	Mauritania and Benin	West Africa Coastal Areas Blue Economy and Resilience Multi-Phased Program – WACA+	Maur: \$5m Ben: \$5m	Regional project
East Asia and the Pacific	Philippines	Philippines Fisheries and Coastal Resiliency Project	\$5m	Project under implementation. REDA only possible with additional IDA financing, not confirmed
Latin American and the Caribbean	Jamaica, Antigua Barbuda, Dominica	Unleashing the Blue Economy in the Caribbean (UBEC) – Phase II	\$5 million	Regional project
Latin America and the Caribbean	Brazil	Expanding Clean Hydrogen in Brazil - Ceara Green Hydrogen Hub	\$3 million	Project under implementation. REDA only possible

				with additional IDA financing, not confirmed
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Further potential REDAs have been identified but are not yet formally in the pipeline. This includes work in Mozambique, Timor-Leste and the Philippines which align strongly with BPF objectives.

Option 0: Do Nothing

The “Do Nothing” option assumes no further investment into PROBLUE. This option is **not recommended**. Without additional investment this year, several high-impact, country-led projects may not be funded in time to deliver results before the fund closes in 2030. REDAs are typically more impactful than BEDAs, as they are delivered directly by recipient countries, leveraging local expertise to improve efficiency, ownership, and effectiveness.

The economic appraisal estimates that the £12 million uplift could generate up to £55.1 million in additional Net Present Value (upper bound estimate for Option 2, the recommended option). Choosing not to invest would forego these potential benefits, including improved marine health, climate resilience, poverty reduction, and enhanced livelihoods.

The funding could instead be allocated to other Defra programmes delivering benefits, including other BPF programmes, if the funding can be absorbed elsewhere within the required timeframe.

Option 1: Uplift investment by £7 million over two years

This option proposes the following:

- ***Total uplift = £7 million***
- Uplift in 2025/26 = **£4 million** (57%)
- Uplift in 2026/27 = **£3 million** (43%)

The updated BCR analysis estimates that this uplift could generate **£8.3 million – £31.8 million** in **additional Net Present Value**. The Benefit-Cost Ratio range is **2.2–5.8**, indicating strong value for money. The lower-upper range is based on varying assumptions for the reduction in marine plastic leakage (and plastic waste generated per household), carbon prices, and the production value per tonne of sustainable aquaculture.

This option is not recommended, as Options 2 and 3 deliver higher net present value.

Option 2: Uplift investment by £8 million 2025/26 and 2026/27

This option proposes:

- ***Total uplift = £8 million***
- Uplift in 2025/26 = **£8 million** (100%)
- Uplift in 2026/27 = **£0** (0%)

The updated BCR analysis estimates that this uplift could generate **£9.9 million – £38.1 million** in additional NPV. The BCR range remains **2.2–5.8**, under the assumption that there are no diminishing returns to investment.

This option is not recommended, as Option 3 delivers higher net present value.

Option 3: Uplift investment by £12 million over two years, 2025/26 and 2026/27 (preferred)

The third option proposes:

- **Total uplift = £12 million**
- Uplift in 2025/26 = current expectation is **£8 million** (67%)
- Uplift in 2026/27 = **£4 million** (33%, depending on final 25/26 allocation)

The updated BCR analysis estimates that this uplift could generate **£14.4 million – £55.1 million** in additional NPV. The BCR range remains **2.2–5.8**, under the same assumption concerning diminishing returns.

Option 3 is recommended as it delivers the highest Net Present Value (NPV) of the different options. The investment of £12m also includes flexibility to put more funding into the programme in 2025/26, to fund REDA programmes which are likely to provide a higher ROI. The BCR for BEDAs, while estimated to be lower than for BEDAs, remains positive, so any funding in 2026/27 will continue to provide a positive net present value.

As with Option 2, Option 3 assumes no diminishing marginal returns to investment. On this basis, the higher investment level delivers the highest NPV. This assumption is considered reasonable given that demand for REDA financing significantly exceeds the current budget, suggesting continued high marginal returns, as unmet demand indicates the potential for additional investments to fund further high-value projects. The Mid-Term Review led by KPMG also identified spare capacity within the programme to absorb additional funds. The analysis supports investment up to the £12 million proposed under Option 3, representing a balanced recommendation that reflects positive results where available, while acknowledging current data limitations and the risks to value for money associated with reliance on assumptions.

To recommend a higher level of investment, more comprehensive results data would be required to provide assurance that additional funding would continue to deliver good value for money. With results data expected in 2026, there will be an opportunity to strengthen the economic analysis.

Risks and uncertainties

Key risks and limitations remain consistent with those identified in CCN 2023. Attribution, additionality and the potential for diminishing returns are difficult to assess due to evidence gaps and system uncertainty. Benefit modelling relies on assumptions, as quantified data on marine interventions is limited. The demand-led nature of the portfolio adds unpredictability to future project characteristics. Delivery risks include the absence of annual targets, early-stage implementation, and potential delays flagged in the midterm review. If all risks materialise, the BCR could fall below 1.5, though current output performance suggests this is unlikely.

Further improvements to the model should include a distributional analysis, but there is insufficient disaggregated data available to inform a distribution of benefits by gender, and the scope of PROBLUE is so broad that it renders it challenging to explore distribution by country income status (i.e. LDCs, LMICs and UMICs) or for the benefits to SIDS. Again, with

improved results data expected in 2026, the BPF Evidence Team will be able to build this analysis into the updated modelling.

Summary

Option 3 (£12m investment over two years, 2025/26 and 2026/27) is recommended as it is estimated to deliver high value for money, with an additional Net Present Value of **£14.4 million – £55.1 million** (the highest of all the options) at a Benefit Cost Ratio of **2.2 to 5.8**. This option balances impact and cost-effectiveness, and retains flexibility to adjust future spending. It is not recommended to increase funding beyond the £12m, due to the risk and uncertainties caused by limitations within the current economic modelling. If future investment decisions are required, the appraisal will be update with the new data expected in 2026.

3. Commercial Case

Competency of delivery organisation

The World Bank remains well placed to deliver PROBLUE, demonstrated by the programme's rapid growth and strong financial management. By June 2025, PROBLUE had secured nearly US \$292 million from 10 donor partners, underscoring its capacity to manage large-scale funding and maintain financial resilience. The World Bank's broader Blue Economy portfolio has also doubled since 2020, from US \$5.9 billion to US \$10.5 billion.

PROBLUE's portfolio expanded from US \$143 million in 2023 to US \$218.5 million by June 2025, supporting 286 activities across more than 100 economies—evidence of its increasing global reach and impact. Donor engagement remains strong, with 12 active partners on the Partnership Council, including Australia, Canada, the EU, France, Germany, the UK, and the US. Recent new or renewed contributions include Sweden (US \$28.3 million), Norway (US \$3.4 million), and the European Commission (US \$3.45 million).

Delivery Model

This proposal does not recommend a change to the delivery model currently in place. The commercial mechanism is a financial contribution that operates through an Administration Agreement (AA). The original AA was agreed and signed in November 2021 by the World Bank and Defra for the initial approved value of £6 million. Further contributions have been agreed through amendments to the AA:

- Administration Agreement: November 2021, £6 million
- Administration Agreement: March 2022, £2 million
- Amendment: January 2023, £14.75 million
- Amendment: March 2024, £7.25 million
- Amendment: November 2024 £7.5 million

Total £37.5m

Once the AA or associated amendment is in place, a payment can be triggered with the Defra ODA finance team through the provision of the signed agreement and a Call for Funds (disbursal request).

The budget proposed for 25/26 will come from the marine ODA allocation that has already been agreed through the one-year 2025 SR and will require one amendment to the AA to disburse. A further amendment will be required for a 26/27 disbursal.

Procurement (Commercial) Strategy

The investment does not fall under commercial delegations of approvals as it does not involve procurement or grant giving and has the following characteristics:

- Is not subject to procurement legislation under PCR 2015 or Defra Procurement policy.
- Is not subject to Government Functional Grants Standards six step process as it does not meet the attributes of a grant.

Any further future investment would be subject to further consideration of outcomes and budgets agreed in future spending reviews.

The Administrative Agreement (and its amendments) will be reviewed by a commercial resource.

Commercial risks

Please refer to Annex B for the current risks register. Risks are either stable or decreasing since the FBC.

A note on what remains the same

This section of the CCN remains largely unchanged compared to the original FBC of September 2021, owing to the fact that the commercial mechanism is in place and has been operational for four years. It has not been necessary to document changes to due diligence, fund management and state aid sections. A Central Assurance Assessment (CAA) was completed in 2022 by FCDO, with updates expected in late 25/26. This will continue to be used as the main assurance for the World Bank and updates to the CAA will be cascaded down to the management of PROBLUE. We will build on the CAA through monitoring due diligence recommendations and risk throughout the programme cycle and as part of the formal AR process.

4. Financial Case

The BPF will increase its current £37.5 million commitment to PROBLUE by £12 million, with £8 million expected in FY2025/26 and £4 million in FY2026/27 (subject to final allocations). To accommodate this uplift, a 12-month costed extension to the programme is being proposed, extending the end date of the current arrangement from 31 March 2026 to 31 March 2027.

This contribution continues to be entirely ODA funded, with the allocation required for this uplift already secured as BPF budget through the 2025 single-year spending review and as part of the 2026-2029 multi-year spending review. Any possible future funding beyond that of the uplift detailed in this CCN will be subject to outcomes of the scoping for a new blue finance business case for the BPF, as well as performance reviews, and to the successful delivery of agreed objectives. The investment will be made in the form of a financial contribution via an extension to the existing administrative agreement with the World Bank, who will continue to coordinate delivery of the programme.

Table 7: Revised spend profile for PROBLUE

	FY21/22	FY22/23	FY23/24	FY24/25	FY25/26	FY26/27	Total
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Original spend profile (at time of BC approval)	£6m	£4.75m	£4.75m	£4.75m	£4.75m	/	£25m
Actual spend profile (to date – following 2023 uplift)	£8m	£14.75m	£7.25m	£7.5m	/	/	£37.5m
Spend profile with requested uplift subject to approval	£8m	£14.75m	£7.25m	£7.5m	£8m	£4 (subject to final allocations)	£45.5m

*Budget for 26/27 is subject to resolution of other programme budgets, however the economic evaluation supports up to £4m funding for PROBLUE, taking the investment over the two years of the revised FBC to £12m.

Updated budget and timeframes

Annex C, Tables 1 and 2, provides an overview of PROBLUE budget forecasts for 25/26.

Defra Resource

Table 15 outlines the number and cost of Defra staff working on the programme management of PROBLUE in 2023/24 - 25/26. Funding for these roles comes from ODA budgets. The total cost of the FTE listed below is within control total and is affordable within current budgets.

Table 8: Defra FTE supporting PROBLUE management

FTE	Civil service grade	Cost
0.1	6	£9232
0.25	7	£17,618
0.3	SEO	£15,883
0.75	HEO	£35,838

A note on what remains the same

RDEL/CDEL

Whilst knowledge products are a part of the fund's activities, pooled contributions cannot be attributed to CDEL/RDEL costs and this split in budgets is not a part of the World Bank's financial reporting to donors. The budget proposed here will therefore be 100% RDEL.

Financial management and reporting

The uplift will be reflected in an amendment to the administrative agreement, which will be co-signed by Defra and the World Bank.

Financial reporting requirements remain unchanged. Accounting and financial reporting requirements are set out in Section 3 of the administrative agreement, with the PROBLUE Secretariat beholden to donors to provide financial reporting. The World Bank also publishes an annual Trust Fund Single Audit Report, undertaken by an independent auditor.

The payment(s) will be made in Great British Pounds (GBP).

Financial and fraud risk assessment

In line with ODA guidance, Defra expects all organisations to have a zero-tolerance approach to fraud and corruption, acting immediately if it is found, working with authorities to bring perpetrators to account and pursuing aggressive loss recovery approaches. Therefore, we require the World Bank to have systems in place to detect and combat fraud, as detailed

in the FBC. There is a 2025 fraud and error risk assessment in place for this programme, based on the 2022 CAA.

Permissions to withdraw funding

Section 5 (disbursement, cancellation, withholding of payments) of the admin agreement sets out the conditions under which the donor can address non-compliance with the WB and if necessary, withhold payments until relevant measures have been taken.

Accounting officer tests

The primary accounting office tests were considered throughout the development of the FBC and built upon for the 2023 and 2025 CCN.

Table 9: Revised Accounting Offer tests revised according to proposed uplift

Regularity	<p>This funding will align with the emerging UKHMG 2035 Climate, Nature and Energy Strategy, through its objectives to create sustainable partnerships in tackling environmental threats. ODA funding will be allocated under Section 1 of the International Development Act 2002 and expenditure will be in accordance with this legislation and all ODA requirements.</p> <p>Approval for this funding is being sought from PROBLUE SRO, ODA board and the Director General for the Environment Group in Defra. See the supporting IAAP document for more information.</p>
Propriety	<p>The original business case received approval from the ODA Board in August 2021 and from the Defra Investment Committee in September 2021. In 2023, the case was revised through a change control note, incorporating an uplift of £12.5m. A further uplift of £12m worth of funding up until March 2027 is sought in 2025.</p> <p>The programme funds will be managed in accordance with HMT's Managing Public Money guidance and ODA guidance.</p>
Value for Money	<p>The economic case finds that the BCR for the total spend amount (£49.5m) remains high, with a low-high BCR range of 2.2–5.8. The Value for Money for the spend options are appraised in the economic case section. The recommended option (Option 2) demonstrates good Net Present Value and includes unquantified benefits such as the increased level and proportion of investment into REDAs, flexibility to adjust spending in FY26/27, and lower financial and assumption-based risk.</p>
Feasibility	<p>The UK has funded PROBLUE since 2021, and through that period has gained confidence in the World Bank's ability to deliver impact and value for money (see programme performance and impact highlights). The UK – as the former co-chair of the PROBLUE partnership council and a prominent donor – has influence over the programme. The World Bank continues to be a credible vehicle for multilateral development spend, with continued recipient demand and capacity to deliver at scale.</p>
Affordability	<p>This spend is envisioned for FY25/26 and FY26/27. The combined budget for both years is affordable under the 2025 single year SR allocation to the BPF, and the multi-year spending review allocation (FY26/27 – FY28/29).</p>

5. Management Case

UK's Role in PROBLUE

See the PROBLUE business case for more background information on the management structure of PROBLUE.

The Partnership Council (PC) provides strategic oversight, endorsing annual work plans, communication and visibility plans, budgets, and results frameworks. The UK is a prominent member of the PC and has been instrumental in shaping PROBLUE priorities, for example on GEDSI.

The UK will attend and contribute to:

- PC meetings, using its role as a previous co-chair and major donor for the programme to influence strategic direction and outcomes.
- Donor only meetings, to help formulate agreed positions amongst donors and agree priority areas for the World Bank to focus its efforts.

Monitoring, Evaluation, and Learning (MEL)

PROBLUE's MEL framework:

A logframe is in place which includes a defined set of outputs and specific indicators from PROBLUE's overarching framework. Defra claims a proportion of the results related to our investment.

The logframe and Theory of Change were last updated in 2023. The 2023/24 AR recommended considering proportionate changes to the logframe including setting annualised targets for PROBLUE activities. This approach is being discussed by the programme management teams, analysts and the World Bank. As the approach is yet to be formalised, the existing logframe and ToC has been provided (for both, see Annex D).

The PROBLUE Theory of Change (Figure 1, Annex A) demonstrates how activities and outputs lead to desired outcomes and impacts. Delivery of these impacts also link to the economic benefits highlighted in the economic case section.

PROBLUE's Monitoring and Evaluation (M&E) Plan assessed progress by looking at cross-cutting issues and synergies between the pillars. An independent mid-term evaluation is complete with findings embedded in this CCN. An independent final evaluation is planned. These MEL tools will be used to help evaluate the success and VfM alongside annual reviews.

Programme Performance and Impact

As detailed in the economic case, PROBLUE is a high-performing programme, rated 'A' having delivered strong output results to date.

Reporting

Programme progress is reviewed annually through the World Bank's Annual Report and Partnership Council meetings, with a strong focus on results-based management and accountability to donors. The next PROBLUE Annual Review (covering July 2024–June 2025) is due in January 2026.

Independent evaluations also assess progress toward a sustainable blue economy. The World Bank’s Making Waves report by the Independent Evaluation Group highlighted PROBLUE’s effectiveness in advancing inclusive ocean development. A mid-term review by KPMG (March 2022) found PROBLUE performing well and recommended scaling up funding and scope.

A final review will be completed at programme closure, following World Bank Trust Fund guidelines, alongside a Defra-led Programme Completion Report in line with ODA requirements.

Risks and risk management

A full risk register is maintained to monitor and manage programme risks in line with HMG guidance, reported through the BPF Programme Management Meeting. Risks related to delivery, funding, donor engagement, reputation, and impact are regularly reviewed, with mitigations agreed between Defra, the World Bank, and other donors via the Partnership Council and donor meetings.

Assurance on safeguarding, procurement, and financial management is sought through the World Bank’s Central Assurance Assessment, while Defra reviews its own register to ensure mitigations remain effective. The Risk Potential Assessment (RPA) supporting this CCN rates PROBLUE as *low risk*. Risk appetite is defined by category and regularly assessed by the programme team.

Table 10: PROBLUE Risk Appetite levels (see definitions in Annex B)

Risk Category	Appetite	Set by (Name/Title - SRO/PRO)	Date Set (DD/MM/YY)
Strategy and Context	Open	SRO	01/06/2025
Delivery and Operational	Cautious	SRO	01/06/2025
Financial and Fiduciary	Cautious	SRO	01/06/2025
Project and Programme	Open	SRO	01/06/2025
Reputational	Cautious	SRO	01/06/2025
Safeguarding	Cautious	SRO	01/06/2025

Risks outside of appetite or those that are escalating, are reported to the BPF SRO and onwards to the Deputy Director via a regular Management Information meeting. When appropriate, risks will be escalated to the BPF Joint Management Board and/or the ODA Assurance Board for advice.

Annex B shows the current risk register. We have also included a risk on leveraging finance to reflect new considerations for the proposed uplift. The evidence we now have on PROBLUE performance and risk-mitigation has increased confidence around these previously identified risks. While they will need to be monitored to ensure they do not hamper the progress of the programme, we have less cause for concern than at the FBC stage.

GEDSI Ambition (Gender Equality, Disability & Social Inclusion)

PROBLUE was assessed as GEDSI-sensitive in FY23/24 and is delivered in line with the World Bank's Gender Strategy 2024 – 2030⁷. Between 2019 and 2023, PROBLUE's portfolio saw 96% of operations incorporate gender-inclusive advisory and analytical services, thus improving women's access to job opportunities. Building on these outcomes, 97% of activities in 2023/24 addressed social inclusion issues, including gender. Efforts included enhancing women's roles in fisheries and aquaculture, advocating for gender-inclusive policies and the role of women in informal waste industries, increasing educational opportunities, and valuing women's contributions in coastal zones. Proposals for FY24/25, include 97% with gender analysis and strategies, surpassing the FY25/26 target of 80%. Defra's appraisal of the programme is that it is strong on gender, with emerging focus on Indigenous Peoples, marginalised groups and equality of access to job opportunities. A PROBLUE GEDSI focal point, supported by regional specialists, drives integration across programme themes.

The UK/PROBLUE GEDSI Action Plan has been drafted to show a pathway to a Defra GEDSI Empowering standard across all projects, with at least one project piloting a Transformative approach. Actions to achieve targets are being further refined by Defra and PROBLUE, steered by the WB's Gender Strategy and Defra's Principles for Inclusive Nature Action. Targets include:

- 100% of new proposals include gender and disability analysis.
- >50% of projects track benefits for people with disabilities.
- Disaggregation of data by sex, age, disability, Indigenous status, and geography, consistent with the Inclusive Data Charter.
- Integration of Principles for Inclusive Nature Action through self-assessments and Action Plans.
- Dedicated interventions addressing gender-based violence (GBV) in marine and fisheries contexts.

Disability Inclusion

Building on the World Bank Disability Inclusion and Accountability Framework and UK/PROBLUE GEDSI Action Plan, the PROBLUE WB team are encouraged to undertake the following:

- Targeted actions to identify and mitigate barriers for people with disabilities.
- Ensure all activities and benefits are accessible.
- Strengthen stakeholder engagement with disabled persons' organisations.
- Embed these commitments in GEDSI Action Plans at project level.

The WB team have been actively engaged in identifying achievable actions to meet GEDSI and PSEAH requirements, but with caveats reiterated on the limits on reporting, stipulated in the language of the central UK/WB administrative agreement.

Public Sector Equality Duty (PSED)

⁷ World Bank Gender Strategy 2024-230: Accelerating Gender Equality for a Sustainable, Resilient and Inclusive Future. <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099013107142345483>. Accessed last 22/09/25

The UK will draw on Defra's ODA Equalities Impact Assessment (May 2025) and the Blue Planet Fund GEDSI strategy to communicate expectations around inclusive programming. This includes reinforcing alignment with the World Bank's Gender Strategy (2024–2030), encouraging the use of GEDSI-sensitive and empowering approaches in REDAs and BEDAs, and advocating for the inclusion of GEDSI indicators and disaggregated data in monitoring frameworks. It also encompasses reinforcing the Principles for Inclusive, Gender-Responsive, Locally Led Biodiversity Action, discussion of a minimum GEDSI spend target and the use of GEDSI Action Plans within both BEDAs and REDAs. Through strategic engagement, the UK will work to ensure that PROBLUE continues to advance equality of opportunity, eliminate discrimination and foster good relations, in line with the Public Sector Equality Duty and the UK's broader international development commitments.

GEDSI and SEAH Risks and Mitigation

Delivery of GEDSI objectives presents several strategic risks, including:

- Risk of exclusion – that interventions inadvertently overlook marginalised or underrepresented groups (e.g. women, Indigenous Peoples, persons with disabilities).
- Limited disability inclusion – insufficient attention to accessibility and engagement with Disabled Persons' Organisations could undermine inclusion goals and increase risks of SEAH and/or ability to report incidents.
- Non-compliance with Public Sector Equality Duty (PSED) – failure to demonstrate due regard to equality across all programme areas.
- Insufficient capacity or monitoring mechanisms – that could weaken delivery of GEDSI outcomes or result in under-reporting.

Mitigation measures include strengthening the integration of GEDSI project design, maintaining close collaboration with regional GEDSI specialists, and aligning reporting with both the World Bank Gender Strategy and Defra's GEDSI Empowering Standard. All new PROBLUE project proposals and analytical activities will incorporate gender, disability, and social inclusion analysis in accordance with the World Bank Gender Strategy 2024–2030.

SEAH (Sexual Exploitation, Abuse, and Harassment)

The most recent UK-World Bank Central Assurance Assessment states that its overall central policies and procedures meet the FCDO's safeguarding standards. Within PROBLUE and given lack of reporting on SEAH cases within the Trust Fund, donors are unsure about PROBLUE's level of compliance with prevention of SEAH policies. The Defra programme team work closely with FCDO's Safeguarding Unit to encourage adoption of minimum safeguarding standards and to include clear and specific language on SEAH within all MDB funding templates. This includes ongoing efforts to improve World Bank reporting on SEAH risks. The main areas to manage risks of SEAH and improve reporting by the WB are to:

- Understand the World Bank's current practices related to PSEAH, including how these policies are integrated across stages of design and delivery, including by delivery partners on recipient-led activities. For example, a visit to Indonesia earlier this year highlighted the existence of grievance and SEAH reporting mechanisms, however it also highlighted potential barriers to reporting SEAH incidents, such as accessibility to office locations or the complexity of processes.
- Identify which of the recommended actions in the SEAH action plan are the highest priority and can be actioned by the PROBLUE team, given the precedence of WB's

internal policies and governance on SEAH. To support ongoing discussions between the WB and Defra on SEAH and to action recommendations from the 23/24 PROBLUE Annual Review, teams are working to a SEAH action plan.

ix. Lessons Identified and Implemented

Monitoring, Reporting & Evaluation

Defra's Annual Review is complemented by the KPMG mid-term review and the World Bank IEG report '*Making Waves*'. However, the current MEL framework lacks specific output and outcome targets, and existing output targets have been consistently exceeded. Defra is exploring a modelled-target approach to better measure progress, and the World Bank is being encouraged to provide more qualitative project-level impact data. Early engagement with the Secretariat mitigates timing risks between AR cycles.

Coherence and Engagement

Defra promotes coordination across World Bank programmes (PROBLUE, PROGREEN, GPS) and with FCDO teams, strengthening coherence and knowledge sharing. Joint Partnership Councils and collaboration with regional BPF coordinators, as demonstrated in the 2025 Indonesia site visit, have improved reporting quality and visibility of PROBLUE's impact within UKHMG.

Strengthening SEAH Requirements

The World Bank actively works with Defra to strengthen mechanisms for identifying, reporting, and addressing SEAH risks, following WB policies and FCDO guidance.

Implications of Non-Approval

Without the 2025 PROBLUE CCN uplift, the programme would continue, but unmet REDA demand (currently ~\$14 million) would persist, limiting scale. Non-approval could also weaken UK credibility as a global ocean leader, reduce influence with donors, and forego the opportunity to leverage PROBLUE's catalytic impact on sustainable, country-led blue economy initiatives.

x. Annexes

Annex A: PROBLUE Theory of Change and Logframe

Through discussions at Partnership Council the UK will reflect with the Secretariat on whether updates are needed to the Theory of Change, given the push to invest more in REDAs.

Figure 1: World Bank's PROBLUE Theory of Change

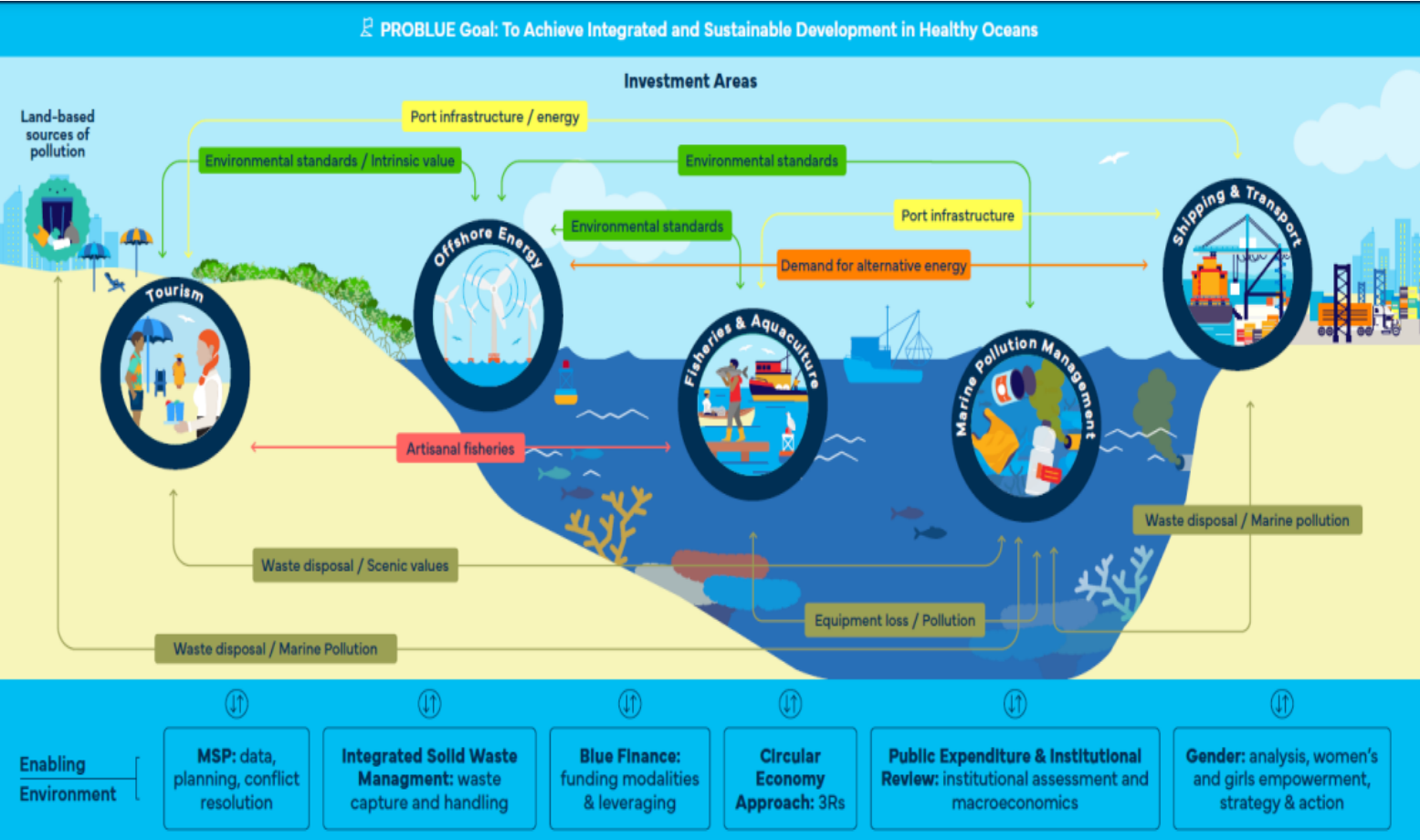


Table 1: 2024 PROBLUE logframe with data

PROJECT TITLE	PROGRAMME NAME		Baseline (Mar-23)	Mar-24	Mar-25	Mar-26	Mar-27	Mar-28	Mar-29	Assumptions	
IMPACT	Improved environment through sustainable marine and coastal management practices leading to improved quality of life, coastal communities more resilient to climate shocks, protected ecosystems and their services, and positive outcomes for biodiversity and the sustainable blue economy.	Impact Indicator 1	Planned							<ul style="list-style-type: none"> The World Bank are able to effectively collect accurate data from its projects and aggregate to a programme level There is no double counting of any of the indicators across projects, BPF programmes and over time We are able to reasonably attribute and account for additionally so that results are deemed to be a direct result of PROBLUE intervention <ul style="list-style-type: none"> We are able to disaggregate to relevant categories within the received data The methodology used to estimate the amount of GHG emissions reduced is reasonable and is not impacted by optimism bias We are able to distinguish between GHG emissions reduced (e.g. through mangrove restoration) and avoided (e.g. through better waste management practices) <ul style="list-style-type: none"> The management of marine ecosystems is sustainable, effective and enforceable over time 	
		Achieved									
		Data, sources and methods									
		Method: ICF KPI 6. Use PROBLUE indicator C.6 (greenhouse gas (GHG) emission reductions, tCO2eq/year). Disaggregation: GHG emissions sequestered; GHG emissions prevented. Linked Defra KPIs: ICF 6									
		Impact Indicator 2	Planned								
		Achieved									
		Data, sources and methods									
		Method: BPF KPI 2.2 methodology. Use PROBLUE indicator C.1 (beneficiaries (number), disaggregated by type of benefits received, of which women and of which from disadvantaged groups). Disaggregation: gender, age, location, disability status. Linked Defra KPIs: DI 7; DI 9									
		Impact Indicator 3	Planned								
		Achieved									
Data, sources and methods											
Method: ICF KPI 17. Use PROBLUE indicators C.23 (marine and coastal areas under enhanced conservation and management, ha) and C.24 (marine Protected Area(s) expanded and/or under improved management, ha). Disaggregation: Marine Protected Areas (MPAs); Area under sustainable management. Linked Defra KPIs: ICF 17, ICF 8, DI 1)											
RISK RATING											
OUTCOME	Finance is mobilised to build stakeholder capacity and capability, and strengthen sustainable marine systems	Outcome Indicator 1.1	Planned							<ol style="list-style-type: none"> The World Bank are able to effectively collect accurate data from its projects and aggregate to a programme level There is no double counting of any of the indicators across projects, BPF programmes and over time We are able to reasonably attribute and account for additionally so that results are deemed to be a direct result of PROBLUE intervention <ul style="list-style-type: none"> We are able to disaggregate to relevant categories within the received data The World Bank's definition of finance mobilised matches the definition under ICF KPIs 11 and 12 We are able to decide upon an effective and objective score for BPF KPI 3 using the best information available from the World Bank The methodology used to estimate the amount of waste reduced/avoided is reasonable and is not impacted by optimism bias We can effectively baseline against aquaculture production to gain an accurate picture of the increase in sustainable production due to PROBLUE intervention 	
		Achieved	£234,000,000	£41,340,000							
		Data, sources and methods									
		Method: ICF KPIs 11 and 12. Use PROBLUE indicators B.3, B.4, B.5 and B.17. Disaggregation: private finance; public finance. Linked Defra KPIs: ICF 11; ICF 12									
		Outcome Indicator 1.2	Planned								
		Achieved									
		Data, sources and methods									
		Method: BPF KPI 3 methodology. Use PROBLUE indicator C2 (people participating in planning and decision-making on the Blue Economy (number), of which women and of which women in decision-making roles). Disaggregation: Increased representative and effective systems of co-management; increased capacity of all resource users to participate in co-management; increased and/or improved community organising									
		Outcome Indicator 1.3	Planned								
		Achieved									
Data, sources and methods											
Method: BPF KPI 7 methodology. Use PROBLUE indicator C.12 (leakage of plastics to the environment reduced, mt). Linked Defra KPIs: DI 5											
Outcome Indicator 1.4	Planned										
Achieved											
Data, sources and methods											
Method: PROBLUE indicator C.7											
RISK RATING											
Defra (£)		Govt (£)	Other (£)	Total (£)					Defra SHARE (%)		
OUTPUT 1	Working with local, regional & national stakeholders to conduct capacity building activities, supporting PROBLUE pillars 1-4	Output Indicator 1.1	Planned							<ol style="list-style-type: none"> The World Bank are able to effectively collect accurate data from its projects and aggregate to a programme level There is no double counting of any of the indicators across projects, BPF programmes and over time We are able to reasonably attribute and account for additionally so that results are deemed to be a direct result of PROBLUE intervention <ul style="list-style-type: none"> We are able to disaggregate to relevant categories within the received data The outputs are of good quality and lead to positive learnings and outcomes for stakeholders Workshops, trainings and consultations reach the right audience and are delivered to a reasonable number of individuals/organisations Tools and knowledge products are effectively shared to the right audience to increase the scope for learning 	
		Achieved	427	271	215						
		Data, sources and methods									
		PROBLUE Indicator: "Capacity building events: workshops, trainings, and consultations conducted (#)"									
		Output Indicator 1.2	Planned								
		Achieved	85	49	54						
		Data, sources and methods									
		PROBLUE Indicator: Tools developed (#)									
		Output Indicator 1.3	Planned								
		Achieved	322	212	177						
Data, sources and methods											
PROBLUE Indicator: Knowledge products prepared (#)											
RISK RATING											
Defra (£)		Govt (£)	Other (£)	Total (£)					Defra SHARE (%)		

Annex B:

Table 11: PROBLUE Risk Register [REDACTED]

Table 2: Risk appetite levels for PROBLUE

Risk Category	Appetite	Set by (Name/Title - SRO/PRO)	Date Set (DD/MM/YY)
Strategy and Context	Open	SRO	01/06/2025
Delivery and Operational	Cautious	SRO	01/06/2025
Financial and Fiduciary	Cautious	SRO	01/06/2025
Project and Programme	Open	SRO	01/06/2025
Reputational	Cautious	SRO	01/06/2025
Safeguarding	Cautious	SRO	01/06/2025

Table 3: Risk appetite level descriptions

Risk Appetite	Description
Averse	Avoidance of risk and uncertainty in achievement of key deliverables or initiatives is key objective. Activities undertaken will only be those considered to carry virtually no inherent risk.
Minimalist	Preference for very safe business delivery options that have a low degree of inherent risk with the potential for benefit/return not a key driver. Activities will only be undertaken where they have a low degree of inherent risk.
Cautious	Preference for safe options that have low degree of inherent risk and only limited potential for benefit. Willing to tolerate a degree of risk in selecting which activities to undertake to achieve key deliverables or initiatives, where we have identified scope to achieve significant benefit and/or realise an opportunity. Activities undertaken may carry a high degree of inherent risk that is deemed controllable to a large extent.
Open	Willing to consider all options and choose one most likely to result in successful delivery while providing an acceptable level of benefit. Seek to achieve a balance between a high likelihood of successful delivery and a high degree of benefit and value for money. Activities themselves may potentially carry, or contribute to, a high degree of residual risk.
Eager	Eager to be innovative and to choose options based on maximising opportunities and potential higher benefit even if those activities carry a very high residual risk.

Annex C: PROBLUE indicative budgets for FY25/26 [Redacted]

Annex D: PROBLUE GESI and SEAH Action Plans

Gender Equality and Social Inclusion Action Plan

Objective: Strengthen the integration of GESI within the PROBLUE programme by ensuring coordinated efforts across projects and aligning with the World Bank's robust GESI strategy.

Table 1: PROBLUE GESI Action Plan 2024

Focus Area	Actions Planned	*Timeline	Deliverables	Outcome	Owner
Governance and Oversight	Appoint an Overarching Lead for GESI	Q1,2025	Central point of contact for GESI	Strengthen governance by ensuring effective leadership and accountability for GESI integration.	PROBLUE Secretariat
GESI Integration and Policy Alignment	Align PROBLUE's practices with the World Bank GESI Strategy	Q2,2025	GESI alignment report identifying compliance and integration gaps	Ensure consistency and adherence to GESI standards across all PROBLUE projects.	PROBLUE Secretariat (with Defra)
Monitoring and Evaluation of GESI Integration	Implement M&E for GESI	Q3,2025	M&E report tracking GESI outcomes and improvements	Evaluate effectiveness of GESI interventions and drive continuous improvement.	PROBLUE M&E Team (with Defra)

* The timeline for these actions will be confirmed following discussions with the PROBLUE Secretariat.

This GESI Action Plan serves as a draft proposal for collaboration between Defra and the Secretariat. Through this collaboration, we aim to ensure that GESI is deeply embedded into PROBLUE projects, achieving both improved social and poverty outcomes and alignment with the World Bank's GESI strategy.

SEAH Action Plan [Redacted]