• Water availability and sustainability is questionable: There is not sufficient assurance that rainwater will be sufficient and that groundwater will not be over-exploited. Furthermore, there is no analysis of the effect water usage may have on local communities who might also depend on the resource. An analysis on water use displacement is missing.

• The proposal has no information on the extent of stakeholder consultations conducted, nor whether any Indigenous Peoples might be affected. It appears to be very top down, without ensuring the stakeholder engagement at the community level necessary for successful project implementation.

• No gender assessment or gender action plan is provided, despite the proposal’s argument that it will lead to the empowerment of women and will focus on women’s leadership in planned cooperatives and the argan value chain. There is no sex-disaggregation of direct and indirect beneficiaries, and no target for the training of women or diversified training approaches. The development of a gender assessment at the project preparation stage and a gender action plan should be made a condition for approval – something that the ITAP fails to mention.

• The project’s listing as cross-cutting is a bit misleading. The driver is mitigation with some adaptation/livelihood diversification co-benefits. This should be accurately reflected in reporting on the GCF’s portfolio.