

# Implementation of the National Biosafety Framework in Uzbekistan in accordance with the Cartagena Protocol on Biosafety

Review CEO Approval and Make a recommendation

## Basic project information

**GEF ID**

11988

**Countries**

Uzbekistan

**Project Name**

Implementation of the National Biosafety Framework in Uzbekistan in accordance with the Cartagena Protocol on Biosafety

**Agencies**

IUCN

**Date received by PM**

8/20/2025

**Review completed by PM**

**Program Manager**

Celine Augereau ep Coisy

**Focal Area**

Biodiversity

**Project Type**

MSP

## CEO Approval Request

### Part I - General Project Information

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

Secretariat comment at CEO Endorsement Request

10/30/2025

Cleared.

09/23/2025

Not cleared. As proposed, the EA is FAO, which is a GEF Agency. Please update the 'Project Executing Type' to 'GEF Agency'.

Agency Response

**IUCN, 22 October 2025**

Thank you very much for your comment. Kindly note that this is now corrected in the portal as well as in the Project Document.

**b) Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable?**

Secretariat comment at CEO Endorsement Request

09/23/2025

Cleared.

Agency Response

**2. Project Summary.**

**a) Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected results?**

**b) Does the summary capture the essence of the project, is well written and is it within the max. of 250 words?**

Secretariat comment at CEO Endorsement Request

10/30/2025

a) Cleared.

09/23/2025

a) Not cleared. It seems that a part of the text is missing at the beginning. Please correct.

b) Cleared

Agency Response

**IUCN, 22 October 2025**

-

a) Thank you very much for your comment. We apologise for the error and it is now corrected. Kindly note that the project summary is now reflecting 100% of the project summary in the revised ProDoc.

**3. Project Description Overview**

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

Secretariat comment at CEO Endorsement Request

10/30/2025

b) Cleared

09/23/2025

a) Cleared.

b) Not cleared. It seems that component 3 is also part of the project monitoring. Please consider separating clearly a component 3 on the knowledge management and component 4 for Monitoring and evaluation of the project.

Agency Response

**IUCN, 22 October 2025**

b) Thank you very much for your component. As advised we have separated component 3 on knowledge management and component 4 for monitoring and evaluation of the project.

**4. Project Outline**

**A. Project Rationale**

- a) **Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?**
- b) **Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?**
- c) **If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?**

Secretariat comment at CEO Endorsement Request

09/24/2025

- a) Cleared
- b) Cleared. The Private sector is mainly seen as a stakeholder.
- c) NA

#### Agency Response

##### 5 B. Project Description

- 5.1 a) **Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the thrust and basis (including scientific) of the proposed solutions, how they provide a robust solution and listing the key assumptions underlying these?**
- b) **Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?**
- c) **Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks are properly justified? Is there an indication of why the project approach has been selected over other potential options?**
- d) **Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?**
- e) **Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?**
- f) **Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?**
- g) **How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this MSP)?**
- h) **Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?**
- i) **Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component description/s?**
- j) **Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?**
- k) **Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?**
- l) **Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?**

#### Secretariat comment at CEO Endorsement Request

10/30/2025

- c)
- Component 1: Cleared.
- Component 2: Cleared
- Component 3: Cleared
- f) Cleared.
- h) Cleared.
- i) Cleared.

j) Cleared.

09/24/2025

a) Cleared.

b) Cleared.

c) Not cleared.

- Component 1: Please precise the role of Ministry of industry and role of private companies in the governance system and the decision making.

- Component 2: Please precise if the private sector will be part of the awareness, capacity building and training programs.

- Component 3: Please consider separating the Component 3 from the Monitoring and Evaluation, and concentrate in this component all activities dedicated to capitalization of knowledge, transmission, researches, awareness and communication ... Output 2.4 of component 2 could be part of this component 3.

Consider working with universities, ministry of education or research centers on this topics.

Monitoring and evaluation is dedicated to monitor the implementation of the project only.

Please, update the budget table consistently.

d) Cleared.

e) Cleared.

f) Not cleared. Some goods are charge to PMC (Desktop, Printer). This is not eligible. Please charge those to components.

g) The project develops and operationalizes a national biosafety policy and regulatory framework aligned with the Cartagena Protocol, designed to evolve with scientific and technological advancements. It will help to establish an administrative systems and institutional arrangements (including laboratories for LMO detection and human resource development), to be flexible and responsive to future biosafety challenges. It also plan to reinforce the capacity through capacity building in administrations, trainings sessions across private and public sectors, involving also local communities.

h) Not cleared. Please provide a stakeholder engagement plan in a separate document and upload it in the portal. Detail the stakeholders that has been consulted, their roles and how they will be involved in the project, and in the governance and decision making in particular.

i) Gender considerations are mainstreamed in all project components, including risk assessments, LMO approval processes, and public consultation. A gender action plan is in the Prodoc document. Please upload it in a separate document.

j) Not cleared. Please detail the way the project will work with Universities and research centers or will have impact on scholar curriculum. Provide a detailed component, distinguishing the awareness, communication and learning activities, depending on the publics targeted.

k) Cleared. Some policies have been identified. The main issues arise from conflicting or incomplete regulatory frameworks, gaps in technical capacity, and political conflicts over mandates. There are critical gaps in systems for LMO (Living Modified Organism) detection,

identification, and risk assessment, which impede the development of a national biosafety system. The National Strategy for Ensuring Food Security and Healthy Nutrition (2024) calls for a ban on GMOs in food products, while the draft Food Safety Law requires compliance assessment and state registration for GMO-containing foods. These approaches conflict, especially since the country lacks accredited laboratories to monitor GMO presence. The policy, legal and institutional framework established through the project should permit address those barriers. Also the capacity building enforcement.

l) Yes cleared.

## Agency Response

**IUCN, 22 October 2025**

c) Thank you very much for your comment, This is now described in the "Gender and Socio-economic Considerations" and "Relevant Stakeholders" sections. It is also integrated throughout all activities and outputs of the project.


The name of the Ministry of Industry has now been added as an example of multisector representation in the biosafety committee. A new paragraph has been added to the description of activities under Component 1.


For Component 2, this is already clearly stated.

University participation is already foreseen in the project. The Tashkent State Agrarian University has been consulted, and the Ministry of Education will support the execution of output 2.4.4.

Components 3 and 4 have been revised to reflect separated KM and M&E outcomes.

f) Thank you very much for your comment. Kindly note that the budget has been updated as advised with ineligible expenditures including desktop computer and printer now shifted from PMC to the components

h) Thank you very much for your comment. This information is available in Annex I of the Agency Project Document and is now uploaded as a separate document titled "Annex I. Stakeholder Engagement Plan" 

i) Thank you very much for your comment. The Gender Analysis and Action Plan is now uploaded as a separate document titled "Annex J: Gender Analysis and Action Plan" 

j) Thank you very much for your comment. Kindly note that Output 2.4.4 will deliver a university degree training curricula on biosafety. This activities will be developed together with Ministry of Education and the Tashkent Agrarian University. This information is present in the Results Framework under Annex C. This is also stated under page 22 for the description of the Outcome 2.4.

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

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

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

**c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed**

**projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).**

Secretariat comment at CEO Endorsement Request

11/14/2025

b) Cleared

10/30/2025

b) Not cleared. Please, make the PMU location clear in the diagram as well.

09/24/2026

a) Cleared.

b) Not cleared.

- While the Agency is not technically performing a dual role as proposed, there is still complete project execution by a GEF Agency rather than a national EA. It is not immediately clear from the Institutional Arrangements section why the decision to execute through a GEF Agency, as opposed to a national EA, was made for this project. Please, provide the rationale for GEF Agency execution in the Institutional Arrangements section.

- The Institutional Arrangements do not indicate where the PMU will be hosted ? within the MEEPCC, within FAO Country Office, etc. Please clarify in this section and include the rationale for the siting of the PMU, recalling that best practice for country ownership and national capacity enhancement is to place the PMU within national host institutions. Please make the PMU location clear in the diagram as well.

c) Cleared. The project acknowledges that Central Asia currently has limited expertise in biosafety and GMO regulation. This is demonstrated by the region's incomplete implementation of Cartagena Protocol measures and its minimal participation in international biosafety forums. While there are some initiatives in related areas, such as biosafety concerning biological weapons in Kazakhstan, there remains a significant gap in expertise and focus specifically on GMOs. Nevertheless, the project will cooperate with ongoing initiatives and projects in the country by leveraging existing infrastructure and expertise within Uzbekistan's network of state organizations and research institutions.

Agency Response

**IUCN, 12 November 2025**

b) Thank you very much for your comment. Kindly note that the diagram figure has been revised to state that PMU will be hosted by MEEPCC.

**IUCN, 22 October 2025**

b) ? Thank you very much for your comment., Kindly note that FAO is the ideal executing agency for this GEF project due to its neutrality, allowing it to broker cooperation among stakeholders and overcome the limitations faced by MEEPCC in project implementation. Building capacity within government institutions is a long-term process, and FAO's proven expertise in capacity development ensures effective support during this transition. Additionally, FAO's extensive technical knowledge of genetic engineering, biotechnology governance, and the Cartagena Protocol makes it well-equipped to handle the project's complex technical requirements, ensuring compliance with international standards.

- Text has been revised in the Institutional Arrangements section to describe and justify that the PMU will be hosted by the Ministry of Ecology, Environmental Protection and Climate Change.

### **5.3 Core indicators**

**a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?**

**b) Are the project's targeted contributions to GEBS (measured through core indicators)/adaptation benefits reasonable and achievable? Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?**

Secretariat comment at CEO Endorsement Request

09/24/2025

a) Cleared

b) Cleared.

Agency Response

### **5.4 Risks**

**a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?**

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

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

Secretariat comment at CEO Endorsement Request

10/30/2025

a) Cleared.

b) Cleared.

09/24/2025

a) Not cleared. Please complete the table for Technological and Financial risk, and for The overall rating Explanation of risk and mitigation measures.

b) See comment above and update.

c) Cleared.

Agency Response

**IUCN, 22 October 2025**

a) Thank you very much for your comment. Kindly note that the risk table has been updated following the GEF latest guidance.

b) Thank you very much for the comment. The risk rating has not changed as innovation risks were all categorized as 'low'.

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

Secretariat comment at CEO Endorsement Request

Agency Response

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

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

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

Agency Response

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

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared

Agency Response

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

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

Agency Response

**7 D. Policy Requirements**

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

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

Agency Response

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

Secretariat comment at CEO Endorsement Request

10/30/2025

Cleared.

09/24/2025

Please upload in a separate document.

Agency Response

**IUCN, 22 October 2025**

Thank you very much for your comment. The Gender Analysis and Action Plan is now uploaded as a separate document.

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

Secretariat comment at CEO Endorsement Request

10/30/2025

Cleared.

09/24/2025

Please upload in a separate document

Agency Response

**IUCN, 22 October 2025**

Thank you very much for your comment. The Stakeholder Engagement Plan is now uploaded as a separate document

**8 Annexes**

**Annex A: Financing Tables**

**8.1 GEF Financing Table and Focal Area Elements: Is the proposed GEF financing (including the**

**Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):  
STAR allocation?**

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

Agency Response  
**Focal Area allocation?**

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

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

Secretariat comment at CEO Endorsement Request

Agency Response

**SCCF A (SIDS)?**

Secretariat comment at CEO Endorsement Request

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

Secretariat comment at CEO Endorsement Request

Agency Response  
**Focal Area Set Aside?**

Secretariat comment at CEO Endorsement Request

Agency Response  
**8.2 Project Preparation Grant (PPG)**  
**a) Is PPG reimbursement requested and if so, is it within the eligible cap of USD 50,000?**  
**b) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?**

Secretariat comment at CEO Endorsement Request

10/30/2025

a) Cleared.

b) Cleared.

09/24/2025

a) Please correct the Prodoc (no PPG requested) consistently to the Portal where a PPG is requested.

b) Please provide the justification of utilization of the PPG.

The Project Information section indicates that a \$50,000 PPG is associated with the project (first image). Please revise the Status of Utilization of PPG section (second image) to reflect this grant and include any costs budgeted against it, as well as the amount spent to date and amount committed.

|                                |              |                              |              |
|--------------------------------|--------------|------------------------------|--------------|
| Type of Trust Fund:            | GET          | Project Duration (Months):   | 36           |
| GEF Project Grant: (a)         | 1,784,863.00 | GEF Project Non-Grant: (b)   | 0.00         |
| Agency Fee(s) Grant: (c)       | 160,637.00   | Agency Fee(s) Non-Grant: (d) | 0.00         |
| Total GEF Financing: (a+b+c+d) | 1,945,500.00 | Total Co-financing:          | 7,000,000.00 |
| PPG Amount: (e)                | 50,000.00    | PPG Agency Fee(s): (f)       | 4,500.00     |

| ANNEX D: STATUS OF UTILIZATION OF PROJECT PREPARATION GRANT (PPG)                          |                           |                      |                  |
|--|---------------------------|----------------------|------------------|
| Provide detailed funding amount of the PPG activities financing status in the table below: |                           |                      |                  |
|  | GET/LDCF/SCCF Amount (\$) |                      |                  |
| Project Preparation Activities Implemented   | Budgeted Amount           | Amount Spent To date | Amount Committed |
| Total  | 0.00                      | 0.00                 | 0.00             |

## Agency Response

**IUCN, 22 October 2025**

a) Thank you very much for your comment. The Agency ProDoc is corrected to indicate a PPG is requested.

b) The use of PPG funds was justified by the complexity of the sector's institutional architecture and the need to conduct extensive consultations and analytical work to prepare a high-quality full-sized project. Under the PPG, the following were carried out: (i) an institutional and legal analysis and a mapping of roles/mandates; (ii) collection of missing baseline data and completion of foundational assessments, including a gender analysis and a gender action plan; (iii) consultations with all key stakeholders (central/regional authorities, the private sector, NGOs, and youth/women) and agreement on coordination mechanisms; (iv) preparation of techno-economic justifications and preliminary design of pilots, including a risk/benefit analysis; (v) development of environmental and social instruments and preparation of the monitoring and evaluation plan and the knowledge management plan; and (vi) refinement of the logical framework, indicators and baselines, as well as detailed budgeting and a phased work plan, including co-financing.

### 8.3 Source of Funds

**Does the sources of funds table match with the OFP's LOE? Note: the table only captures sources of funds from the country's STAR allocation**

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

### Agency Response

**8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines? e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?**

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

### Agency Response

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

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

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

### Agency Response

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

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

### Agency Response

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

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared.

Agency Response

**8.6 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project before the PIF submission?**

Secretariat comment at CEO Endorsement Request

Agency Response

**Annex C: Project Results Framework**

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

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

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

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

Secretariat comment at CEO Endorsement Request

11/14/2025

c) Cleared

10/30/2025

a) Cleared.

c) Not cleared. The second comment hasn't been addressed. Please ensure, as per GEF guidance, that under M&E, gender-related results and lessons learned, including those related to the implementation of the Gender Action Plan, are regularly monitored and reported through the PIR, MTR, and TE.

09/24/2025

a) Not cleared. No please complete the table.

b) Cleared

c) Not cleared. Please correct by precisising in all relevant indicators breakdown by gender. In line with GEF guidance, please ensure that the RF integrates gender-sensitive indicators. This could include, for example, sex-disaggregated indicators for Outputs 1.1.3, 1.2.3, 2.1.4, 2.3.2, 2.4.2, as well as indicators such as the number of gender-responsive policies adopted and the number of women-led organizations represented in decision-making bodies and committees. Additionally, please ensure that under M&E, gender-related results and lessons learned, Including those related to the implementation of the Gender Action Plan, are regularly monitored and reported through the PIR, MTR, and TE.

d) Cleared.

Agency Response

**IUCN, 12 November 2025**

c) Thank you very much for your comment. The specific and dedicated reporting indicators on gender-related results and lessons learned and the implementation of the Gender Action Plan have been included in the Results Framework Table (Annex C) for the PIR, MTR and TE. And also added into the text for ANNEX F: MONITORING AND EVALUATION.

**IUCN, 22 October 2025**

a) Thank you very much for your comment. The only GEF CI in this project is CI 11. This CI has been included in the Results Framework under a single outcome. This is because the calculation of the number of beneficiary took into consideration that many beneficiaries will be the same in the different outputs. Therefore, adding CI number into every output will overestimate the actual number of beneficiaries.

c) ? Thank you very much for your comment. The output indicators for CI11 have been disaggregated by sex with the project target of 40% women.

-Gender dimension has been included in policy and regulation as well as public awareness outcomes.

- The PIR, MTR and TE have been included as indicators.

**Annex E: Project map and coordinates**

**8.8 Are geo-referenced information and maps provided indicating where the project interventions will take place ?**

Secretariat comment at CEO Endorsement Request

10/30/2025

Cleared.

09/24/2025

This project will not have any field interventions. But please, consider inserting the geographic coordinates of Capital of Uzbekistan, as GEF aims to have all projects geocoded.

Agency Response

**IUCN, 22 October 2025**

Thank you very much for your comment. Kindly note that the geographic coordinates of Tashkent has been added.

**Annex F: Environmental and Social Safeguards Screen and Rating**

**8.9 Have safeguard screening document and/or other ESS document(s) attached and been uploaded to the GEF Portal?**

Secretariat comment at CEO Endorsement Request

09/24/2025

Cleared

Agency Response

**Annex G: GEF Budget template**

**8.10 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?**

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

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

Secretariat comment at CEO Endorsement Request

12/1/2025

b) Cleared.

11/17/2025

b) Consultancies: Not cleared. The costs of personnel (consultants and staff) is still high (37%). We see that some positions may be redundant. For instance, after reading the TORs we suggest to have only one Expert on Cartagena Protocol (in green rectangle), one Gender expert (in blue rectangle), and one Assistant (in red rectangle).

c) Cleared.

11/14/2025

b)


- M&E: cleared

- Consultancies: Not cleared. The costs of personnel (consultants and staff) is still high (37%). We see that some positions may be redundant. For instance, after reading the TORs we suggest to have only one Expert on Cartagena Protocol (in green rectangle), one Gender expert (in blue rectangle), and one Assistant (in red rectangle).

- Budget: Not cleared. The new version of the Budget has been upload in the documents but the old one is still uploaded in the portal view. Please replace the old one by a new word version in the portal.

| Document Title                          | Category                    | Prefix | Classification           | Last Modified Date | Publish |
|---|-----------------------------|--------|--------------------------|--------------------|---------|
| GEFID 11988_Detailed Budget_12 Nov 2025 | Project Supporting Document | Others | GEF Secretariat Use Only | 11/12/2025 1:43 AM |         |

## ANNEX G: BUDGET TABLE

Please upload the budget table here. 

Title

GEF ID 11988\_Annex G CER\_GEF Project Budget Template 

c) TOR: Not cleared. The TOR for Technical Support Specialist for Comp 1, Technical Support Specialist for Comp 2, Technical Support Specialist for Comp 3 are missing. Please complete.

10/30/2025

a) Cleared.

b) Not cleared.

- M&E is 77000 USD in the Description overview table. Please address the comment.

### M&E

|                            |                   |
|----------------------------|-------------------|
| Component Type             | Trust Fund        |
| Technical Assistance       | GET               |
| GEF Project Financing (\$) | Co-financing (\$) |
| 77,000.00                  | 400,000.00        |

- Consultants' costs accounts for 43% of the total project budget, which is high. Please consider using more established partners in the country and explaining your strategy for institutionalization of the projects results (including training) that will be developed. Please consider streamlining and reducing the costs.

- Most of GOE items are indeed for training/workshops/meetings, please re-categorize as such:

| Cost Categories  | Component 1    | Component 2    | Component 3    | Component 4 (M&E) | PMC            | Total            | Responsible Entity |
|--|----------------|----------------|----------------|-------------------|----------------|------------------|--------------------|
|  | Total          | Total          | Total          | Total             |                |                  |                    |
| <b>5028 GOE budget</b>   |                |                |                |                   |                |                  |                    |
| Misc. expenses (translation costs, car rentals, fuel costs, customs clearance, etc.)       |                | 20,800         |                | 0                 | 1,000          | 21,800           | FAO                |
| Inception workshop   | 3,000          | 2,000          | 4,000          | 0                 |                | 9,000            | FAO                |
| Annual gender session (2x for 40 participants)   | 15,000         | 0              | 0              | 0                 |                | 15,000           | FAO                |
| Final validation workshop for the National Policy Document on Biosafety                    | 0              | 0              | 10,000         | 0                 |                | 10,000           | FAO                |
| Training session on biosafety policy and regulation (2x for 60 participants)               | 15,000         | 0              | 0              | 0                 |                | 15,000           | FAO                |
| Workshop to finalise procedural guidelines with relevant implementation agencies           | 8,000          | 0              | 0              | 0                 |                | 8,000            | FAO                |
| Meeting to launch biosafety website  | 8,000          | 0              | 0              | 0                 |                | 8,000            | FAO                |
| Training session on risk assessment of LMOs (2x for 40 participants)                       | 0              | 10,000         | 0              | 0                 |                | 10,000           | FAO                |
| Follow up workshops in risk assessment (2x for 40 participants)                            | 0              | 10,000         | 0              | 0                 |                | 10,000           | FAO                |
| Practical training course on detection and identification of LMOs (1x for 20 participants) | 0              | 3,500          | 0              | 0                 |                | 3,500            | FAO                |
| Specialized workshop on border control (1x for 40 participants)                            | 0              | 5,000          | 0              | 0                 |                | 5,000            | FAO                |
| Awareness-raising sessions with target groups (3x for 40 participants)                     | 0              | 15,000         | 0              | 0                 |                | 15,000           | FAO                |
| Gender workshop (1x for 30 participants)   | 0              | 4,000          | 0              | 0                 |                | 4,000            | FAO                |
| Training courses on socio-economic considerations (2x for 40 participants)                 | 0              | 10,000         | 0              | 0                 |                | 10,000           | FAO                |
| National workshops for development of policies and guidelines (5)                          | 30,000         | 0              | 0              | 0                 |                | 30,000           | FAO                |
| Consultation workshops on labelling (2)  | 0              | 16,000         | 0              | 0                 |                | 16,000           | FAO                |
| Final workshop   | 2,000          | 4,000          | 2,500          | 0                 |                | 8,500            | FAO                |
| <b>€300 Sub-total GOE budget</b>   | <b>81,000</b>  | <b>100,300</b> | <b>16,500</b>  | <b>0</b>          | <b>1,000</b>   | <b>198,800</b>   |                    |
| <b>TOTAL</b>   | <b>298,850</b> | <b>#####</b>   | <b>201,750</b> | <b>77,000</b>     | <b>161,800</b> | <b>1,784,863</b> |                    |

c) Not cleared. Please address the comments. The TORs are not uploaded in a separate document.

09/24/2025

a) Not cleared.

b) Not cleared.

- The current M&E budget is 5.4% of GEF project financing. Typically, projects seeking up to \$5M of GEF support will budget no more than 5% to M&E. Please consider revising the M&E budget to align with GEF portfolio standards.

- Please remove the decimal places from all USD amounts throughout the budget table to save space and make it more easily readable.

c) Not cleared. The TORs are in the Prodoc. Please upload in a separate document the TORs of staff funded by GEF. Please also ensure that position descriptions are aligned between the Budget Table and the TORs. For example:

- Position titles in the Budget Table differ from the TORs, such as 'Policy Expert' under Local Consultants appears to refer to the 'National Policy Analysis Specialist' in the TOR. Please correct all such inconsistencies upon resubmission.

- TORs appear to be missing for most of the International Consultants listed in the Budget Table. Please include TORs for these roles as well.

- Several roles in the TORs are labeled as '[Position Title], Ministry of Ecology, Environmental Protection and Climate Change' yet the Institutional Arrangements and Budget Table indicate that all project consultants/staff will be the responsibility of FAO or IUCN. Please revise accordingly.

- There are three separate budget lines for a 'National Technical Chief Advisor' role and no TORs. Please, explain this discrepancy and the appearance of 3 versions of the same role and revise accordingly. It is hard to understand the need of three National Chief Technical Advisors when already there is a Project Coordinator + a National Project Director. Most

projects implemented and executed by other entities only have one Managerial position ? same applies to the positions Project Assistant and administrative Assistant.

|   |              |              |              |              |              |              |              |              |              |                   |   |   |            |     |
|---|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------------|---|---|------------|-----|
| National<br>Technical<br>Chief Advisor<br>(1) | 8,750.<br>00 | 8,750.<br>00 | 8,750.<br>00 | 8,750.<br>00 | 8,750.<br>00 | 8,750.<br>00 | 8,750.<br>00 | 8,750.<br>00 | 8,750.<br>00 | 70,0<br>00.0<br>0 | - | - | 70,<br>000 | FAO |
| National<br>Technical<br>Chief Advisor<br>(2) | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 30,0<br>00.0<br>0 | - | - | 30,<br>000 | FAO |
| National<br>Technical<br>Chief Advisor<br>(3) | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 3,750.<br>00 | 30,0<br>00.0<br>0 | - | - | 30,<br>000 | FAO |

- Please ensure there is clear distinction and division of labor between this role and that of 1) sectoral specialists/experts already in the budget, 2) the Project Coordinator and 3) the National Project Director.
- When resubmitted, we will review the budget again and provide comments if appropriate.

#### Agency Response

##### **IUCN, 27 November 2025**

Thank you for your comment. As advised, kindly note that the budget in the consultancy line has been reduced to be less than 30% of the GEF financing budget. Some of the consultancies have been moved to the budget line on contracts and their services will be procured as opposed to being hired as individual consultants.

##### **IUCN, 17 November 2025**

b) We apologise for not previously uploading the updated version of the GEF template version of the budget, which is now uploaded in the relevant section of the portal

c) Thank you very much for your comment. Kindly note that the revised version the technical specialists for Components 1, 2 and 3 have been removed which is also correspondingly reflected in the updated GEF template version

##### **IUCN, 12 November 2025**

Thank you very much for your comments.

b) There was a typo in our response, the total M&E amount is 77,000 USD.

The consultancy line in the budget is decreased to 37.5%.

The budgetary items are recategorized, the events/trainings/workshops now are under Training budget and GoE is separate with one line.

c)ToRs are uploaded as a separate Annex K.

**IUCN, 22 October 2025**

b) Thank you for your comment. Please note that M&E amount is USD 88.300, accounting to 4.95 % of the project total (USD 1,784,863).

The decimals have been removed from the table.

c) Thank you for your comment. ToRs have been added. They are now aligned with the budget. The ToRs for International consultants have been ensured. The inconsistencies have been corrected throughout the ToRs.

**Annex H: NGI Relevant Annexes**

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

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

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

Secretariat comment at CEO Endorsement Request

Agency Response

**Additional Annexes**

**9. GEFSEC DECISION**

**9.1.GEFSEC Recommendation Is the project recommended for approval**

Secretariat comment at CEO Endorsement Request

12/1/2025

The project is ready for endorsement. But currently the Prodoc is not available for circulation. So, please make it available by classifying the document as "Public".

Thus, we could select it for circulation.

| Document Title                                 | Category                | Prefix   | Classification | Last Modified Date | Circulate                           |
|--|-------------------------|--|----------------|--------------------|-------------------------------------|
| CEO Endorsement/Approval Review Sheet Document | Project Review Document | GEFSEC review sheet - CEO Endorsement/Approval Stage | Public         | 12/1/2025 4:30 PM  | <input type="checkbox"/>            |
| CEO Approval                                   | Project Document        | One-step MSP Approval document                       | Public         | 11/29/2025 7:38 PM | <input checked="" type="checkbox"/> |

11/17/2025

Some comments still have to be addressed.

11/14/2025

The project is still not yet ready. Please address the comments.

11/03/2025

The project is still not yet ready. Please address the comments. The CEO Approval Request Portal view (which is the document that is circulated to Council) has several sections with yellow shadow. Please remove these shadows.

9/24/2025

The project is not yet ready. Please address the comments.

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

Secretariat comment at CEO Endorsement Request

**9.3 Review Dates**

|   | <b>1SMSP CEO Approval Response to Secretariat comments</b> |                   |
|---|--|-------------------|
| <b>First Review</b>                     | <b>9/24/2025</b>   | <b>10/30/2025</b> |
| <b>Additional Review (as necessary)</b> | <b>11/3/2025</b>   | <b>11/12/2025</b> |
| <b>Additional Review (as necessary)</b> | <b>11/14/2025</b>  | <b>11/17/2025</b> |
| <b>Additional Review (as necessary)</b> | <b>11/17/2025</b>  | <b>11/27/2025</b> |
| <b>Additional Review (as necessary)</b> | <b>11/19/2025</b>  |                   |