Strengthening the capacity of Kazakhstan to comply with the Enhanced Transparency Framework under the Paris Agreement

Review CEO Approval and Make a recommendation

Basic project information

GEF ID
11938
Countries
Kazakhstan
Project Name
Strengthening the capacity of Kazakhstan to comply with the Enhanced Transparency Framework under the Paris Agreement
Agencies
FAO
Date received by PM
6/3/2026
Review completed by PM

Program Manager
Saba Kalam
Focal Area
Climate Change
Project Type
MSP

PIF
CEO
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

Cleared

Agency Response

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

Secretariat comment at CEO Endorsement Request

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 outcomes?
b) Does the summary capture the essence of the project and is it within the max. of 250 words?

Secretariat comment at CEO Endorsement Request
7/23/2026

Cleared

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1. The project summary would be much stronger with an opening paragraph that clearly lays out the problem the project aims to address. This would set the stage for readers and provide essential context right up front.

Agency ResponseAn additional paragraph was added in the summary to explain the problem the project aims to address. Thank you for pointing this out.

3. Project Description Overview
a) Is the project objective statement concise, clear and measurable?
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 budgeted for?
d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
e) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request
7/23/2026

Cleared

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3 a) Cleared

3 b) It may be useful to consider adding an output on a baseline assessment or gap analysis of existing data systems and institutional capacities prior to the development of the KCCTMIS, so as to provide a stronger evidence base for system design and implementation.

3. c) Cleared

3. d) & e) PMC is 10% and PMC co-financing is proportional to the project co-financing.

Agency Response

3. b) The project design already includes several assessment elements related to institutional capacity, existing MRV arrangements, data availability, and transparency-related gaps that will inform the development of the Kazakhstan Climate Change Transparency Information Management System (KCCTIMS). To make this link more explicit, the project has been revised at the activity level by adding a dedicated activity under Output 2.2.2 to undertake a baseline assessment of existing climate transparency data systems, institutional arrangements, data flows, interoperability needs and capacity gaps. The findings of this assessment will directly inform the development of data protocols, guidelines and the design and operationalization of KCCTIMS. As these assessments serve as enabling activities for the development of the system rather than stand-alone project deliverables, they have been incorporated at the activity level rather than as a separate output.

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

Cleared.

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 focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?
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 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 FSP/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 design and 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
7/23/2026

Cleared

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a)It may be helpful to relate the ToC with the baseline by clarifying how the various existing initiatives and reporting processes relate to one another and how they collectively inform the proposed project design. This could help strengthen the explanation of the starting point and make clearer how the project builds on prior efforts and available support.

b) Cleared.

c) Cleared

d) Cleared

e) Cleared

f) Cleared

g) Please include the text how the project will integrate the changes (if any) expected in the ETF MPGs in 2028.

h) Cleared

i) Cleared

j) Cleared

k) Cleared

Agency Response

a) Thank you for the suggestion. Additional text has been included in Section B to better explain how existing transparency-related initiatives, reporting processes and support programmes complement one another, form the baseline for the project and inform the Theory of Change. The revised text clarifies how lessons learned and remaining gaps identified through NCs, BURs, BTR1, BTR2/NC9, GCF Readiness and CBIT support have shaped the project design and proposed interventions.

g) This has been adressed in Section B, subsection INNOVATION & TRANSFORMATIVE CHANGE, KNOWLEDGE MANAGEMENT, POLICY COHERENCE AND CAPACITY DEVELOPMENT. Text has been added to clarify that the modular design of KCCTIMS and the project?s capacity development approach will enable the integration of any future updates to the ETF MPGs, including those that may arise from the 2028 review process under the Paris Agreement. The revised text explains how reporting methodologies, institutional arrangements and system functionalities will remain aligned with evolving UNFCCC guidance and reporting requirements.

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

7/23/2026

Cleared

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a) The project will be executed by the Ministry of Ecology and Natural Resources of the Republic of Kazakhstan (MENR).

b) FAO is listed as a member of the Steering Committee; however, the document does not specify whether it holds voting rights or its decision-making role. Pursuant to the interim CEO's letter to Agency coordinators on 20 March 2026, please confirm in the CEO Approval document that FAO will have a voice on the PSC but will not be a voting member.

c) Cleared. The project is directly complementary to the GEF-funded Enabling Activity supporting the preparation of Kazakhstan's First Biennial Transparency Report (BTR1). The two projects are explicitly sequenced: the tools, templates, and institutional arrangements developed under this CBIT project will partially contribute to the quality of the BTR1 and will ultimately streamline and institutionalize the processes for BTR2 and subsequent reporting cycles.

Agency Responseb) The fact that FAO will not have a voting right and that it will serve as the Secretariat of the PSC, providing necessary information and background for the proceedings, is clarified under Paragraph 87.

5.3 Core indicators
a) Are the identified core indicators calculated using the methodology and adhering to the overarching

principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)?
b) Are the project's targeted contributions to GEBs (measured through core indicators and additional listed outcome 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
7/23/2026

Cleared

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a& b) Please provide an explanation of how the target numbers were derived for men and women.

Agency Response
a) & b) Additional text has been included under Table on Core Indicators, to clarify that the minimum target of 40 percent women participants was established as a project commitment to promote meaningful participation of women in climate transparency processes and decision-making, recognizing their continued underrepresentation in technical and leadership functions related to climate reporting. The target will be pursued through targeted outreach, engagement of national gender institutions and women?s organizations, and systematic monitoring of participation using sex-disaggregated data.
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 assessed and rated and consistent with requirements set out in SD/PL/03?

Secretariat comment at CEO Endorsement Request
7/23/2026

Cleared

The agency is requested to reinforce the risk matrix by capturing some key and relevant risks associated with this CBIT project.
- Staff turnover of trained technical staff in the Government.
- Technical risks associated with data availability and quality, reliance on default emission factors.
- Limited integration of the KCCTMIS into decision-making processes.

Agency ResponseThe risk matrix has been strengthened by integrating additional risks that you have kindly suggested. These considerations have been incorporated into the existing Political and Governance, Technological and Capacity risk categories, together with enhanced mitigation measures. They significantly strenghten the risks and mitigation section. Thank you for the comment.
5.5 For NGI Only: Is there a justification of the financial structure and of the 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 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?

Secretariat comment at CEO Endorsement Request

Cleared. Aligned with CCM- Objective 2 of the GEF 8 Programming directions.

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

Cleared. The project demonstrates strong alignment with the country's reporting commitments under Article 13 of the Paris Agreement, which establishes the Enhanced Transparency Framework (ETF) requiring Parties to regularly submit national inventory reports and information necessary to track progress towards their Nationally Determined Contributions (NDCs), support received and provided.

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 RequestNA

Agency Response
7 D. Policy Requirements
7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request

Cleared

Agency Response
7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request

Cleared. Gender Action Plan is part of the Agency Prodoc. (Annex K)

Agency Response
7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

Cleared. Stakeholder Engagement Plan is part of the Agency Prodoc. (Annex J)

Agency Response
7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request

Cleared. ESS document uploaded.

Agency Response
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

Cleared.

Agency Response
Focal Area allocation?

Secretariat comment at CEO Endorsement Request

Cleared. The project has been submitted under the CCM focal area set-aside funds.

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 RequestCleared. The project has been submitted under the CCM focal area set-aside funds.

Agency Response
8.2 Project Preparation Grant (PPG)
a) 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
7/23/2026

Cleared

The PPG utilization table indicates fund committed for Inception Workshop and Final consultation meeting, kindly clarify if the consultation meeting has been organised or it is yet to be organised. Some of the items are not eligible without additional details to be validated: ?Project Coordination?? and ?Travels?.

Agency ResponseThe Inception Workshop, stakeholder consultations, and the Final Consultation Meeting were conducted as part of the project preparation process, and the corresponding reports are included in the ProDoc package. The remaining committed funds relate to the final payment for translation and other supporting services upon completion of the documentation. Travels covered travel of consultants and experts for the Inception Workshop and stakeholder consultations undertaken during project preparation. Project Coordination refers to the technical coordination of project preparation and ProDoc development, rather than regular project management or staff salaries. The updated Annex D has been revised to clarify these budget lines in line with the PPG Guidelines.
8.3 Source of Funds
Does the sources of funds table match with the amounts in the OFP's LOE?
Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement Request

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
7/23/2026

Cleared

Please submit an English translation for the cofinancing letters.

Agency ResponseThe unofficial English translation of the co-financing letter is attached along with the original.

Annex B: Endorsements
8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:
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 RequestCleared. The project has been endorsed by Mrs. Saule Sabiyeva, OFP since September 2023

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

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
7/23/2026

Cleared

•OFP letter still reflects the previous project budget of US$2 million. I believe this should be updated to match the revised figures.

Agency Responseclarified with GEFSEC, and the 2 million endorsement letter would be acceptable, and there isn't a need for a resignation letter.

Annex C: Project Results Framework
8.6 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 total project financing (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

Cleared.

Agency Response

Annex E: Project map and coordinates
8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?

Secretariat comment at CEO Endorsement Request

Map included.

Agency Response

Annex G: GEF Budget template
8.8 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
7/23/2026

Requesting OP to kindly review and provide comments, looks okay from PM side.

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1. Please separate the project staff in their dedicated category ?Salary and benefits / Staff costs?.

GEF Expenditure Category	Budget description	Total	Total	Total	M&E	PMC	Responsible Entity	Total GEF
Contractual Services – Individual	*International MRV/ETF specialist*	23,000	5,000	12,000			ICGTIP	**40,000**
	International Adaptation & Loss and Damage Specialist	0	24,000	0			ICGTIP	**24,000**
	International Climate Finance Specialist	10,000	14,000	0			ICGTIP	**24,000**
	Sub-total International Consultants	**33,000**	**43,000**	**12,000**	**0**	**0**		**88,000**
	Project Manager	0	0	0		40,800	ICGTIP	**40,800**
	National Technical Coordinator	26,000	24,600	16,000			ICGTIP	**66,600**
	Finance/Admin Assistant	0	0	0		50,400	ICGTIP	**50,400**
	Specialist to support drafting/preparing various regulatory provisions	21,600	0	0			ICGTIP	**21,600**
	M&E Specialist	0	0	0	14,900		ICGTIP	**14,900**
	Policy and Institutional Specialist	6,900	3,000	2,000			ICGTIP	**11,900**
	Climate transparency and MRV Specialist	9,000	5,000	4,000			ICGTIP	**18,000**
	Communication specialist	7,000	7,500	11,000			ICGTIP	**25,500**
	IT Specialist	0	20,400	0			ICGTIP	**20,400**
	National Gender Specialist	20,000	5,000	5,600			ICGTIP	**30,600**
	Sub-total National Consultants	**90,500**	**65,500**	**38,600**	**14,900**	**91,200**		**300,700**

2. ?Other operating costs? should be charged to PMC. These are not clearly component-level technical activity costs. They look more like Project Management Unit / project office operating costs.

Other Operating Costs	*Office operation needs (stationeries, internet, office transportation costs, rental costs) linked to the project activities*	7,000	9,000	4,000			ICGTIP	**20,000**

3. We could not locate the TORs for the ?Project Manager? and ?National Technical Coordinator? positions. As these appear to be two coordination roles, please provide clear TORs for all positions so that their respective responsibilities can be properly reviewed.

4. Upon resubmission, we will conduct a full review of the budget table again and provide any additional comments.

Agency Response

1. Please note that the two PMC positions will be engaged as consultants rather than staff members. Therefore, they are budgeted under consultancy services and not under the "Salary and Benefits / Staff Costs" category.

2. The budget has been revised to address this comment.

3. The ToRs for both positions have now been prepared and included. The roles and responsibilities have been clearly defined to distinguish the National Technical Lead, who

provides overall technical leadership and quality assurance, from the Project Manager, who is responsible for the day-to-day operational and administrative management of the project

Annex H: NGI Relevant Annexes
8.9 a) Does the project provide sufficient detail (indicative term sheet) to assess the following 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 RequestNA

Agency Response
Additional Annexes
9. GEFSEC DECISION

9.1.GEFSEC Recommendation
Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

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

	CEO Approval	Response to Secretariat comments
First Review	**6/15/2026**	**7/15/2026**
Additional Review (as necessary)	**7/23/2026**	
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		