

Fifth National Communication, Biennial Update Report and Biennial Transparency Reports to the United Nations Framework Convention on Climate Change (UNFCCC)

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

10801
Countries

Brazil
Project Name

Fifth National Communication, Biennial Update Report and Biennial
Transparency Reports to the United Nations Framework Convention on
Climate Change (UNFCCC)
Agencies

UNDP
Date received by PM

5/9/2022

Review completed by PM	
7/19/2022 Program Manager	
Patricia Marcos Huidobro Focal Area	
Climate Change Project Type	
EA	

Non-Expedited Enabling Activity req (PIF) Non-Expedited Enabling Activity req (CEO)

Part 1: Project Information

Focal area elements

Is the enabling activity aligned with the relevant GEF focal area elements as indicated in Table A and as defined by the GEF 7 Programming Directions?

Secretariat comment at CEO Endorsement Request 6/23/2022 PM:

Cleared.

5/16/2022 PM:

Yes. Please clarify the following comment: Is BUR5 still expected to be submitted to the UNFCCC by 12/30/2022? If so, explain the progress made to date by the country on the development of BUR5 and which funds they are using for their development.

Agency Response Jun 1,2022 Originally, in order to follow the Brazil BUR submission schedule and respect the twoyear deadline set out in UNFCCC Decision 2/CP.17, the Brazilian government must submit its next BUR by December 2022. If this deadline is not met, there will be a documented record of this failure to comply with this commitment by the country during the international consultation and analysis process, to the detriment of the assessment of compliance with the country's commitment and reputation internationally.

However, without the implementation of this Enabling Activity project in a timely manner, that is, with the possibility of starting the technical activities for the preparation of the BUR5 at the beginning of the second half of 2022, the Brazilian government will not have the funds or the appropriate technical capacity to fulfill that commitment.

Thus, when considering a possible implementation of the project only in November 2022, the alternative deadline for submitting the BUR5 would be in June 2023, due to the delay in starting activities.

The dates have been adjusted in the CEO Endorsement document for June 2023, both in the Project Information Table and the Project Description Summary Table (1.1.5).

Project description summary

Is the project structure/design appropriate to achieve the expected outcomes and outputs as in Table B and described in the project document?

Secretariat comment at CEO Endorsement Request 6/23/2022 PM:

Cleared.

5/16/2022 PM:

No. Table B is well structured and clear, but please clarify the following comments:

- NC5 and BTR1 are both expected to be submitted to the UNFCCC by December 2024. However, the CEO Endorsement states that the submission of both reports will be done as standalone reports. Please explain whether the team has considered submitting a combined NC/BTR report, which will bring efficiencies not only in the use of resources but also data optimization, and will also build capacity within the country for a combined submission of future UNFCCC reports.
- As for the GHG Inventory, we understand some progress on procedures and arrangements to collect data and the institutional framework has been done in previous NCs and BURs, and that outputs 1.1.1 and 1.1.2 in particular would be built on/benefit

from the lessons learned and structures developed in previous UNFCCC reports. Grateful you can please clarify whether this is the case and, if so, provide more information on the reporting structure and procedures for GHG inventory already in place (if any). As for the GHG registry, it would be helpful to understand how the SIRENE registry has been populated up to now. Also, as per the latest Project Implementation Report (PIR) of the GEF Project 5378 on NC4 and BURs submitted in September 2021, some progress has been done with the inventory and SIRENE system, i.e. "The procedures and the database of the third inventory were updated with a new structure for activity data, emission factors, and other parameters. The information in the National Emissions Registration System (SIRENE) was updated and included more information on GHG emissions and future emissions scenarios. Currently, the SIRENE website is being adapted to a new government layout. Meetings with government partners are ongoing to consider future improvements for the process and a specialized consultancy is underway to develop adequate methodological procedures to estimate LULUCF emissions on a biennial basis". The CEO Endorsement document shall better reflect the progress made on the GHG inventory and registry, and how the proposed project would be built on it.

- Please explain why the institutional arrangements are different for NCs and BTRs, particularly since most of the information reported under them is the same except for the stocktaking and assessment, information on national circumstances and institutional arrangements, and technical assistance sections of the NC which are not required by the BTRs.
- Also, with regards to institutional arrangements, there seems to be some overlaps between Outcomes 2.2, 4.2, and 6.1. Please clarify the scope of each of these outcomes.
- As per the current outcomes and outputs there seem to be some overlaps with GEF Capacity Building Initiative for Transparency (CBIT) Project ID 10932 Strengthening the National Transparency System in Brazil under the Paris Agreement (DataClima+). Please elaborate further on the complementarities between these two projects, and how the proposed project would avoid any potential overlaps. For instance, the PIF for the CBIT project includes a table (i.e. Table 9) on the complementarities between the two projects. According to this table, the CBIT would focus on the SIRENE registry system. Please explain the difference between the activities expected under the CBIT on SIRENE and Output 4.2.3. "Improvement of the National Emissions Registry System" of the proposed project.
- The CEO Endorsement document has not elaborated further on the PIF outcomes. While the document is robust, the CEO Endorsement would benefit from further elaboration on each of the proposed outcomes. Please consider adding/re-structure the document to include a brief description for each outcome. This would also help further understand the scope and objective of each Outcomes (for instance, see comment above on potential overlaps between Outcomes 2.2., 4.2 and 6.1 as well as potential overlaps with the GEF CBIT project).

- Component 3 has been placed after Component 4 and before Component 5. For sake of clarify, please put all Components in the right order.

Agency Response Jun 1,2022

- It should be clarified that the submission date of the two documents (NC and BTR) aims to comply with the UNFCCC decisions regarding the frequency and deadline for sending both. However, the process of elaboration, consolidation and validation of these documents is different. Additionally, within the scope of the UNFCCC rules and procedures, these two documents will undergo different processes, so that only the BTR will have its content submitted to an international review process. Considering the previous, and given that the decision on the format of submission of these documents rests exclusively with the country, the Brazilian government chose to present them as separate reports (standalone report).
- As mentioned in PRODOC, based on improvements carried out on emission categories, according to the analysis of key categories, the Agriculture, Energy, and LULUCF sectors will receive special attention to improve their estimates, given their greater relevance to national emissions. These improvements are related to (i) the access to activity data from information sources more statistically robust; (ii) studies to define emission factors and other regionalized accurate parameters, as far as possible; and (iii) better use of the bases of land use and land mapping initiatives underway in the country, in addition to identifying opportunities for improvements and filling gaps.

SIRENE provides graphs and tables on national emissions, which can be exported in an editable format based on user-selected filters. In addition, all official publications and transparency reports are made available to the general public on the platform. Finally, SIRENE also provides emission and energy scenarios for 2012-2050, which are generated based on information emanating from the project ?Mitigation Options of Greenhouse Gas Emissions in Key Sectors in Brazil?, a GEF project previously executed by MCTI CGCL with the support of UNEP.

The MCTI?s CGCL is responsible for coordinating, managing and maintaining SIRENE. Various public and private entities contribute by providing activity data. They also contribute by developing updated national parameters and emission factors that are

relevant to the methodology to be used in the development of GHG emission and removal estimates.

However, progress need to be implemented, as the information in some sectors continues to be poorly systematized, and it is necessary to improve the quality of the GHG inventory registry and its methodologies to disaggregation.

The CEO Endorsement document has been strengthened under section Narrative description of project activities, and particularly the section of ?Public Awareness, Development of National Capacity, and Gender Mainstreaming in mitigation policies and measures?, where under outcome 4.2 further description of the SIRENE system has been included.

- There is different information required for each of these documents. Although some contents of these documents are similar, there are significant differences between them, such as: the scope of the information to be presented; the requirement for depth and reporting format; the political relevance of the information presented differently in each document; the international review process. In this way, these documents receive contributions from different partners and the process of consolidation, review and final validation of both by the Brazilian government takes place in a different way. Details are presented in the CEO Endorsement (for example in section 4.2) and the Prodoc, i.e. due to decisions regarding modalities, procedures, and guidelines (MPGs) of the Convention for the Paris Agreement, some adjustments to formatting and deepening of analyzes should also be considered. The alignment of the institutional arrangement will be fundamental to fulfill the technical requirements of the Paris Agreement?s Enhanced Transparency Framework. This arrangement is challenging due to the need to consolidate information distributed in several initiatives. To achieve this, it is necessary to improve legal, strategic, methodological, and institutional aspects to ensure compliance with reporting requirements and biennial periodicity.
- There are some similarities between the outcomes but not overlaps. According to the details presented in the Project Document (Prodoc) and a brief description of each outcome that was included in the CEO Endorsement Request, it is possible to differentiate the scope of each of them. In short:

Outcome 2.2: will describe and report the institutional arrangements relevant to the 5NC, the BUR5, and the BTRs preparation.

Outcome 4.2.: is related to capacity building to strengthen the government to manage the existing platforms and databases. The focus will be on strengthening the institutional arrangements and scientific, technical, and institutional improvement for the implementation and monitoring of mitigation actions, the structuring of a national MRV

system, and the preparation of estimates of GHG emissions and their respective database.

Outcome 6.1.: is related to the alignment of the institutional arrangement to fulfill the technical requirements of the Paris Agreement?s Enhanced Transparency Framework and consolidate information distributed in several initiatives.

The focus will be on strengthening the institutional arrangement for a clear definition of the roles and responsibilities of the bodies involved with the preparation of these documents and their specific components, such as the National GHGI, Mitigation Actions, domestic MRV, Support Received, among others. To achieve this, it is necessary to improve legal, strategic, methodological, and institutional aspects to ensure compliance with reporting requirements and biennial periodicity.

- In parallel with the implementation of this Enabling Activity project (GEF Project 10801), the country aims to implement a CBIT project (Strengthening the National Transparency System in Brazil under the Paris Agreement - DataClima+) that was designed to strengthen the climate transparency system of Brazil to meet the requirements of the ETF under the Paris Agreement.

There are differences, complementarities, and synergies between this project and the proposed CBIT project. To summarize the differences between the two projects, the EA Project (GEF Project 10801) - PIF approved in June 2021 and execution expected to starts on 2nd semester 2022 - focuses on supporting Brazil by developing specific UNFCCC and Paris Agreement reports for specific deadlines, as mentioned above. It provides this support through a series of outputs focusing on capacity-building and enriching technical databases for successful report preparation. The Project has a short-term and siloed view, building capacities to develop four reports for responding to multi-lateral climate commitments.

The CBIT project (Received by GEF in March 2022, PIF expected to be approved in June 2022) objective is broader, focusing on supporting Brazil by increasing its institutional capacity for achieving overall compliance with the requirements of the Paris Agreement ETF, through the development of a national transparency system, DataClima+, and will depend on the results of the EA Project (GEF Project 10801). The CBIT project has a long-term systemic view, focusing on data integration and completeness as key steps in strengthening national institutional capacity on climate transparency. The Project aims at setting the institutional arrangements that will be responsible for the preparation of future reports, and for the integration of climate considerations into public and private decision making, a fundamental feature for achieving Brazil?s NDC objective of climate neutrality (net-zero emissions) in 2050.

Related to Output 4.2.3., in the Enabling Activity project (GEF Project 10801) the objective will be the improvement and adequate systematization of information in the domestic MRV platform, with the preparation of estimates of GHG emissions, their respective database, and data enriched due to application of an enhanced methodological approach. This information was provided on Outcome 4.2 of the CEO Endorsement Request.

While the CBIT project will introduce further enhancements, including the development of a corporate GHG emissions inventories database that is reconciled with top-down inventories presented in the NCs/BTRs, integration of the SIRENE platform within DataClima+ to ensure data connectivity and harmonization with other ETF modules. The synergies and differences between both projects are described on PIF submitted to the CBIT project (GEF ID 10932), pages 39-44 and Table 4B.

- A brief description for each outcome has now been included in the CEO Endorsement Request under the sections of Narrative Description of Project Activities.
- The order has been corrected.

Co-financing

Are the confirmed expected amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified [and meets the definition of investment mobilized, and a description of any major changes from PIF, consistent with the requirements of the Co-Financing Policy and Guidelines?]

Secretariat comment at CEO Endorsement Request 6/23/2022 PM:

Cleared.

5/16/2022 PM:

No. Co-financing is not required for Enabling Activities. Co-financing from the Ministry of Science, Technology and Innovations (MCTI) has been confirmed for this project. The Letter of Co-financing includes the correct title of the project but the wrong GEF ID number (which should be GEF ID 10801 instead of GEF ID 10706). Also the Letter of Co-financing does not indicate which amount of the total would be grant and

which in-kind. Finally, the Letter of Co-financing has been uploaded into the GEF Portal but it has not been uploaded in the CEO Endorsement document. Please either submit a new Letter or Co-financing which includes the right GEF ID and specifies the grant and in-kind amounts or remove the current co-financing from Table C since it is not required as per the GEF Policies.

Agency Response

Jun 1,2022

- Given that it is not necessary to present a co-financing letter, please disregard at this point. Note, however, that at the project's Mid Term Review, the rationale related to co-finance for project **implementation will be provided by the Country.**

GEF Resource Availability

Is the proposed GEF financing in Table D (including the Agency fee) in line with GEF policies and guidelines?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

Yes.

Agency Response
Are they within the resources available from:
The STAR allocation?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

Yes, Brazil has these resources available in its STAR allocation.

Agency Response
The focal area allocation?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

Yes, Brazil has these resources available in its STAR allocation.

Agency Response

The LDCF under the principle of equitable access

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

N/A.

Agency Response

The SCCF (Adaptation or Technology Transfer)?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

N/A.

Agency Response

Focal area set-aside?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

N/A. Brazil has chosen to fund this project using only their STAR allocation.

Agency Response

Is the financing presented adequate and demonstrate a cost-effective approach to meet the project objectives?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

Yes. The project demonstrates a cost-effective approach since it will draw on experiences of the past transparency-related projects, in particular NC4. The project will not only prepare for the submission of N5C, BUR5 and BTRs, but also enhance institutional and technical capacities of the transparency framework in Brazil to meet the requirements of these reports.

Agency Response

Part 2: Enabling Activity Justification

Background and Context.

Are the achievements of previously implemented enabling activities cited since the country(ies) became a party to the Convention?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

Yes, this is well and clearly described.

Agency Response Goals, Objectives, and Activities. Is the project framework sufficiently described?

Secretariat comment at CEO Endorsement Request 6/23/2022 PM:

Cleared.

5/16/2022 PM:

No. In addition to comments above on the Project Structure/Design, please address the following comments:

- The coordination structure of the project, including the PMU, is not clear from the project's description. For instance, the project document mentions Project Director, Project Coordinator and Project Manager. Please clarify if this is the same role and, if possible, provide a graphic with the coordination structure of the project and the different roles within both the government and the PMU;
- Please confirm the Environmental and Social Safeguards Screening has been reassessed at CEO Endorsement stage, and/or provide a brief explanation in case the project is exempt as per UNDP policy;
- The project budget is too long and some of the expenditure categories/detailed description are repeated, i.e. standard office equipment, travel, basic office supplies, etc. If possible, please consider simplifying the budget by avoiding repetition.

Finally, please note that a letter from Brazil's OFP requesting direct execution support by UNDP has been uploaded in the system at PIF stage. This letter provides further information on the specific activities to be provided by UNDP and the estimated amounts in US\$ for these activities. The provision of direct services by UNDP, as stated in the OFP letter, has been approved by GEF management at PIF stage.

Agency Response Jun 1, 2022

 This section was adjusted to be in full consistency with Prodoc and provide clarity, replacing the previous section?s content. The project governance arrangement structure was included in graphic as well.

For clarification, please note that the Project Management Unit (PMU) will be responsible for the overall project coordination, including operational planning, supervision, administrative and financial management, and the project adaptive management based on inputs from the M&E plan. Furthermore, it will promote interinstitutional linkages, monitoring, evaluation, and disseminating project results. The PMU is composed of the Project Manager and the Technical Coordinator of the project. The Project Manager (also called Project Coordinator) is hired with GEF resources and is responsible for the overall management activities, such as: preparation and submission of periodic progress reports (PIR-GEF) and regular consultations with beneficiaries and contractors; ensuring advanced funds are used following agreed work plans and project budget; organization of the project evaluation; annual budget revision, managing and maintaining budgets, including tracking commitments, expenditures, and planned expenditures against budget and work plan. The Technical Coordinator is also hired with the project resources and is responsible for the coordination of the all the project's technical activities; planning for and monitoring the technical aspects of the project; and monitoring progress benchmarks and outputs, among others.

Note that the reference to the terminology of "Project Director", was removed from CEO Endorsement document, but the roles and responsibilities remain under MCTI role as Project Executive, in accordance with the Decree 5151/2004 which defines the procedures to be observed by Federal Public Administration of Brazil to celebration of international technical cooperations.

- Yes, the UNDP SESP safeguard unit cleared again the exemption request on August 23, 2021, while requesting the more detailed justification to be included within the Prodoc. This is why the analysis for ensuring compliance with exemption criteria was performed at outcome level and is included as an Annex to the Prodoc.

The project was cleared as exempt from the development of SESP, because following UNDP Social and Environmental Standards policy, all the project activities can logically be placed under one or more of the following three exemption criteria: 1) Preparation and dissemination of reports, documents, and communication materials, 2) Organization of an event, workshop, training, or 3) Strengthening capacities of partners to participate in international negotiations and conferences.

- In response to the request, the table was synthesized by merging similar expenditure categories and has been included in the GEF Portal and Prodoc.

Stakeholders.

Does the project include detailed report on stakeholders engaged during the design phase? Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

Yes.

Agency Response

Gender equality and women?s empowerment.

Has the gender analysis been completed? Did the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities? If so, does the project/program include gender-responsive activities, gender-sensitive indicators and expected results?

Secretariat comment at CEO Endorsement Request 6/23/2022 PM:

Cleared.

5/16/2022 PM:

No. The CEO Endorsement Document states that a Gender Action Plan will be developed during project preparation phase for CEO Endorsement. Please clarify whether this Plan has been developed, and if so, please provide it.

Agency Response Jun 1, 2022 - The gender analysis and gender action plan are included in the Prodoc. Following the comment, the relevant information has now been included in the CEO Endorsement document, under the ?gender dimension? subsection of the ?Enabling Activity, Goals, Objectives and Activities?, as well as under outcomes 3.7, and 4.3.

Monitoring and Evaluation.

Does the project include a budgeted M&E Plan?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

Yes. Budgeted M&E Plan is not required for Enabling Activities. However, the project includes a budgeted M&E Plan which is considered adequate for the size of the project.

Agency Response Cost Effectiveness.

Is the project cost effective?

Secretariat comment at CEO Endorsement Request 6/23/2022 PM:

Cleared.

5/16/2022 PM:

No. The project will effectively build on experience from previous UNFCCC reports. However, as stated above, please explain complementarities between the proposed project and the CBIT project.

Agency Response Jun 1, 2022

In parallel of the implementation of the Enabling Activity project (GEF Project 10801), PIF approved in June 2021 and execution expected to start on 2nd semester 2022, the country aims to implement a CBIT project (Received by GEF in March 2022, PIF expected to be approved in June 2022) that was designed to strengthen the climate transparency system of Brazil in order to meet the requirements of the ETF under the Paris Agreement. There are differences, complementarities and synergies between this project and the proposed GEF/UNEP CBIT

To summarize the differences between the two projects, the Enabling Activity project (GEF Project 10801) focuses on supporting Brazil with developing specific UNFCCC and Paris Agreement reports for specific deadlines: BUR5 (Jun 2023), NC5 (Dec 2024), BTR1 (Dec 2024) and BTR2 (Dec 2026). It provides this support through a series of outputs focusing on capacity-building and enriching technical databases for successful report preparation.

The CBIT project objective is broader, focusing on supporting Brazil with increasing its institutional capacity for achieving overall compliance with the requirements of the Paris Agreement ETF, through the development of a national transparency system, DataClima+.

The CBIT project has a long-term systemic view, focusing on data integration and completeness as key step in strengthening national institutional capacity on climate transparency. While the 5NC, BUR and BTRs project has a short-term and siloed view, building capacities to develop four reports for responding to multi-lateral climate commitments, the CBIT project aims at setting the institutional arrangements that will be responsible for the preparation of future reports, and also for the integration of climate considerations into public and private decision making, a fundamental feature for achieving Brazil?s NDC objective of climate neutrality (net-zero emissions) in 2050.

The Enabling Activity project (GEF Project 10801) will develop excel databases at different levels of maturity for tracking NDC progress and support needed and received. The CBIT project will build synergies with this work by transforming these databases into IT modules that will be part of the DataClima+ system. This work will include:

- ? Enhancing the databases where required to provide a greater richness of data beyond that needed for preparing UNFCCC and Paris Agreement reports;
- ? Converting the databases into a common IT programming architecture and incorporating them into an integrated data system which is user-friendly (for instance, as with regards to inserting new data and using the data);
- ? Ensuring data integration between the databases of the four ETF modules (mitigation, adaptation, NDC tracking, support needed and received) and with the

SINAPSE sub-platform, for ensuring cross-fertilization, greater quality control and assurance, and ultimately leading to richer UNFCCC and Paris Agreement reports and enhanced inputs for national policy-making;

? Making all data publicly available through public dashboards, facilitating greater national transparency on climate action.

Another area of complementarity is on capacity building. Capacity-building activities undertaken through the Enabling Activity project (GEF Project 10801) focus on supporting report preparation. These are specific, one-off training events. The CBIT capacity-building activities will complement those by working with a Brazilian academic institution to develop a national capacity-building programme that continues beyond the life-time of both projects. This programme will complement the Enabling Activity project (GEF Project 10801) activities by focusing on building the capacity of key stakeholders to input data into DataClima+ and use its results for preparing Convention and Paris Agreement reports and undertaking national policy-making.

A third area of complementarity is on supporting Brazil to develop capacity to report on participation in market and non-market mechanisms in accordance with the Paris Agreement?s article 6. The CBIT project will complement the Enabling Activity project (GEF Project 10801) work by developing a corporate GHG emission inventory feature and database as part of SIRENE. This is an important first step in facilitating the participation of private sector actors in carbon pricing mechanisms. The synergies and differences between the both projects are described on PIF submitted to the CBIT project (GEF ID 10932), pages 39-44 and Table 4B.

Cost Ranges

If there was a deviation in the cost range, was this explained?

Secretariat comment at CEO Endorsement Request 6/23/2022 PM:

Cleared.

5/16/2022 PM:

No. This project is not using CCM set-aside resources. Instead, Brazil is using its START allocation to meet the objectives of this proposal. Despite this, please provide an explanation on why the estimated budget (i.e. UDS 7.5 million) goes substantially above the GEF funding for NC and BTRs (i.e. around USD 500k).

Agency Response June 01, 2022

- Many lessons have been identified that feed into this project?s design since the first UNDP/GEF Enabling Activity project, which was submitted in December 2004, at COP-10, and which allowed Brazil to prepare its Initial National Communication (INC). This first project focused mainly on the preparation of a detailed inventory of GHG emissions, and a general description of steps taken or envisaged to implement the Convention.

Based on the several obstacles faced during this first preparation, especially because of the technical and budgetary reasons, the country has improved the process of the estimation of the resources needed per each submission. And as new decisions and rules were deliberated under the Convention and given the continental dimension of the country (Brazil is the planet?s fifth largest with 212 million inhabitants. It has a wide variety of natural features (soil, relief, vegetation, and fauna), that are part of a unique natural composition. Together, the six biomes form one of the planet?s richest biodiversity. The country?s climatology encompasses different climate zones: subtropical, equatorial, and predominantly tropical, with different temperature and precipitation patterns), technical improvements and innovations in the process of systematizing activity data, emission factors for each one of the sectors were being implemented, as well as detailed studies related to the country's vulnerability developed. Since the Third and the Fourth National Communications, based on all the efforts and institutions involved with these enabling projects, the planned activities under the project reflect the financial needs of support to guarantee the improvements and to ensure the satisfactory implementation of all the commitments. In the GEF Project 10801, technical activities, such as GHGI and V&A, must undergo methodological improvements to contemplate the biennial periodicity of the reports that can be carried out only after the formalization of new partnerships and services.

Additionally, based on the lessons learned in the 4NC, we identified the relevance of having the project team permanently structured throughout the entire project's execution. The costs associated with these contracts are high due to the high specialization and technical capacity required to perform the respective functions. Structuring and improvement of databases are planned in an innovative way that, according to our forecast, will also compromise a considerable part of the project budget. In this way, we

understand that the amount to be granted will be necessary to comply with all activities, in order to honor within the required deadlines of the commitments assumed with the UNFCCC. Part III. Endorsement/Approval by OFP **Country endorsement** Has the project been endorsed by the country?s GEF Operational Focal Point and has the name and position been checked against the GEF database? Secretariat comment at CEO Endorsement Request 5/16/2022 PM: Yes. The project has been endorsed by the OFP and the Letter of Endorsement uploaded in the GEF Portal. Agency Response **Response to Comments** Are all the comments adequately responded to? (only as applicable) **GEF Secretariat Comment** 6/23/2022 PM: Cleared. 5/16/2022 PM:

No. See bellow section on Council Comments.

Agency Response
Other Agencies comments?

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

Agency Response Council comments

Secretariat comment at CEO Endorsement Request 7/10/2022 PM:

Cleared.

7/7/2022 PM:

No. Please also add the responses to Council comments into the CEO Endorsement Entry Sheet of the GEF Portal.

6/23/2022 PM:

No. Council comments have been addressed in the CEO Endorsement Review Sheet. However, as requested below, please add an annex to the CEO Endorsement document with the Council comments and the responses provided.

5/16/2022 PM:

No. The comments below from Council members have not been addressed. Please add an Annex in the CEO Endorsement document with the responses to the comments below.

UNITED STATES

- We would appreciate confirmation that the BTR and NC listed here as scheduled to be submitted in 2024, are a combined report (thus \$517k total). We note with concern that, because of how the budget is broken out, it is not clear how the total is allocated amongst reports. This creates confusion regarding the total, which seems to be higher than it should be for one BUR, one combined NC/BTR, and one BTR. Increased clarity on how these multiple reports are being costed will be important moving forward. Could the GEF Secretariat clarify in the subsequent iteration of this proposal how this breaks down?

GERMANY:

- Germany recommends providing more detailed information about the significant amount of co-financing in the form of mobilized investment (\$50,002,209.00) from the Ministry for Science, Technology and Innovation (MCTI) and its funding agencies of research, development & innovation.
- ? Germany welcomes the dedicated sections on gender and the integration of a wide group of stakeholders. However, other civil society actors beyond the Brazilian Forum on Climate Change need to be added, especially for component 3.2 aiming at determining vulnerabilities based on socio-economic factors. Germany recommends putting special attention to indigenous people, local communities and small farmers, who are also particularly vulnerable to the impacts of climate change. Furthermore, it would be essential to provide more details about the planned stakeholder integration.
- ? Germany appreciates the aim of component 3.2 to carry out impact assessment ?on different sectors and relevant issues?. It would be helpful to specify these in advance based on the valuable lessons learnt from previous iterations.
- ? Brazil was among the first countries to prepare a National Adaptation Plan (NAP). NAPs provide significant information for developing and adaptation sections of BTRs. Yet, the role of NAPs is not explicitly mentioned in the PIF. Germany suggests including a reference to Brazil?s NAP in component 3.2.4.
- ? Germany welcomes the public awareness and capacity building and gender mainstreaming approach of Component 4. However, the title does limit these efforts to mitigation policies and measures, while some of the outcomes are directly addressing adaptation to climate change. It is essential to emphasize the need for equal commitment in both areas. It should further be explained how the civil society is going to take part in the public awareness strategy.

Agency Response

Agency Response on June 06/28/2022

Council comments and responses have now been included as an annex in the CEO Endorsement document.

June 01, 2022

- According to the explanations provided above (Project Description Summary comments), the Brazilian government chose to submit these two reports as two separate reports (as a stand-alone report). It should be clarified that although there is some similarity in the content of the reports, there are differences in their scope, in the process of preparation and consolidation of them, in addition to the fact that only the BTR must undergo an international review process. Therefore, the planning of activities and the

execution of the resources associated with each document, will contemplate the specificities of each one and the different levels of technical efforts to be undertaken to meet in a differentiated way the procedures and rules of elaboration and presentation of each one of them. The Prodoc contains further specificity on the activities contemplated under each output. Note that given both complementarities and specificities, the budget is not estimated separately for each type of report.

- Given that it is not necessary to present a co-financing letter it will not be presented at this point. Note however, that at the project's Mid Term Review the rationale related with co-finance will be provided by the Country to implement the project.
- Indigenous people and traditional communities were included in the planned analyses of gender vulnerabilities of the Project Document (Prodoc) but a brief description of each outcome has now been included also in the CEO Endorsement Request.

Related to planned stakeholder integration, the detailed Stakeholder Engagement Plan has been established in the Prodoc. For clarification, please note that a list of major stakeholders at national level builds from 4NC mapping exercises and includes groups that are associated with the project in different ways at all stages. Note that representatives of civil society (including women and youth associations) will have their participation through the Brazilian Forum on Climate Change (FBMC), assuring their perspectives are incorporated in the decision-making process. It is important to highlight that other stakeholder may be identified during the project's activities, on an on-going basis, to the best execution possibilities given national circumstances.

It is planned to promote working meetings annually (1 or 2, as necessary) with the relevant stakeholders, to discuss methodologies, procedures, institutional arrangements, and responsibilities (see the Prodoc's Project Results Framework and Monitoring Plan).

- The information made available from previous National Communications, will consider the analysis of impacts and vulnerabilities in an integrated manner, promoting considerable methodological improvements. And this will be considered as part of a continuous process of updating and improving.

The methodological definitions, including key sectors and relevant issues, will be established, from the governmental position, and from institutional arrangements and formalization of partnerships. The activities will be carried out according to the best execution possibilities given national circumstances. It is planned to promote working

meetings annually (1 or 2, as necessary) with the relevant stakeholders, to discuss methodologies, procedures, institutional arrangements, and responsibilities (see the Prodoc's Project Results Framework and Monitoring Plan).

- In response to the comment the mention to the Brazil?s National Adaptation Plan has now also been included in the CEO Endorsement Request, under Outcome 3.2. Note that the Prodoc mentions also the National Adaptation Plan under Output 3.2.3.
- Brazil recognizes that it is essential the equal commitment in mitigation and adaptation areas. It?s important to clarify that within public awareness and capacity building and gender mainstreaming every mention of climate change is related to both areas (mitigation and adaptation). The details were presented in the Project Document (Prodoc).

According to the strategy for the civil society in the public awareness, it will be established from the governmental position, and from institutional arrangements. The activities will be carried out according to the best execution possibilities given national circumstances. It is planned to promote working meetings annually (1 or 2, as necessary) with the relevant stakeholders, to discuss methodologies, procedures, institutional arrangements, and responsibilities (see the Prodoc's Project Results Framework, Stakeholder Engagement Plan and Monitoring Plan).

STAP Comments

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

N/A.

Agency Response

Convention Secretariat comments

Secretariat comment at CEO Endorsement Request 5/16/2022 PM:

N/A.

Agency Response CSOs comments		
Secretariat comment at CEO Endorsement Request 5/16/2022 PM:		
N/A.		
Agency Response GEFSEC DECISION		
RECOMMENDATION		
Is CEO Endorsement/approval recommended?		
Secretariat comment at CEO Endorsement Request 7/25/2022 PM:		
Please upload an updated version of the ProDoc with the responses to Council comments.		
7/10/2022 PM:		
Cleared.		
7/7/2022 PM:		
No. Please also add the responses to Council comments into the CEO Endorsement Entry Sheet of the GEF Portal.		

No. Council comments have been addressed in the CEO Endorsement Review Sheet. However, as requested below, please add an annex to the CEO Endorsement document with the Council comments and the responses provided.

6/23/2022 PM:

5/16/2022 PM:

No. Please address comments above.

Review Dates

Secretariat Comment at CEO Endorsement

Response to Secretariat comments

First Review	6/1/2022
Additional Review (as necessary)	6/28/2022
Additional Review (as necessary)	
Additional Review (as necessary)	
Additional Review (as necessary)	

CEO Recommendation

Brief reasoning for CEO Recommendations