

Blueing the Caspian Sea

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID
11429
Countries
Regional (Azerbaijan, Kazakhstan, Turkmenistan)
Project Name
Blueing the Caspian Sea
Agencies
World Bank, UNEP
Date received by PM
7/30/2025
Review completed by PM

Program Manager
Taylor Henshaw
Focal Area
Multi Focal Area
Project Type
FSP

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

PLEASE EXPLAIN (IN DETAIL) IN REVIEW SHEET HOW EACH COMMENT HAS BEEN ADDRESSED IN THE CEO ENDORSEMENT DOCUMENT

The transfer for this project was approved by the GEF CEO on August 27th, 2025. Please amend the CEO Endorsement information reflecting the new distribution of funds, as well as other changes in the narrative and tables (i. e. General Project Information, Project Description Overview).

8th of September 2025 (thenshaw):

This is a very low quality submission and needs significant revision for clearance. Please refer to recently endorsed GEF IW projects for guidance.

It is very concerning that the majority of the funds for this project (\$10 million) are from the IW focal area, yet most of the project is now working at the national level.

***The presentation (Components, Outcomes and Outputs) of the revamped project is underwhelming. Please recast overall project architecture phrasing to raise the ambition to deliver a much more robust set of GEBs than what is currently targeted. There must be a full project narrative in the description section rather than a listing.

****It is very concerning that the proponents are now referring to this project as two projects, one implemented by World Bank and one by UNEP. Please speak to GEF Sec to clarify. Such an approach is not permitted and will not be cleared. The Implementing Agencies and Executing Agencies must work in unison as one project.

(i) Project Executing Entities: Please spell out acronyms TCIS and UNOPS. Please include UNEP in brackets after TCIS for avoidance of doubt, as TCIS is administered by UNEP and not a separate legal entity. This change should be made throughout the documentation to identify the proper executing entity.

(ii) Project Sector: Please remove "Mixed & Others". This field is for CCM only.

(iii) The co-financing sources for this project is not acceptable for a \$13M GEF investment. Three sources of co-financing does not demonstrate a mobilization of partners, including from NGOs, CSOs, academia, private sector etc. Further, all participating countries should also at least provide in-kind co-financing. It is also noted that the large World Bank loan attached to this project at PIF is now missing. Please explain.

28th of October 2025 (thenshaw):

(i) Addressed

(ii) Addressed

(iii) Addressed

***GEF IT to add UNEP to Project Information Table as Co-Implementing Agency. Addressed

Please proofread submission to remove notes such as "To be updated after GEF Sec review" and placeholders ""The project will apply the phased approach to protected areas management (described in para xx of the PAD)."

There are still references to two projects, i.e. "Each project will integrate gender considerations through its respective Gender Action Plan (GAP), managed independently by the responsible executing agency." "To measure the effectiveness of the proposed gender actions, the projects will disaggregate respective intermediate results indicators "...The World Bank project will have a Project Implementation Unit (PIU) housed at UNOPS." "The World Bank project will be managed by a PIU housed within the UNOPS Austria Multi-Country Office (AUMCO) in Vienna, Austria. ". "The UNEP Project will be implemented by UNEP and the Tehran Convention interim Secretariat"...The role of TCIS is to coordinate, manage, and administer the day-to-day activities of the UNEP Project. "The UNOPS PIU will maintain regular coordination with the UNEP PIU, which is hosted by the Tehran Convention Interim Secretariat (TCIS), to ensure alignment and complementarity between the two projects." etc.

12th of November 2025 (thenshaw): Addressed

Agency Response

Overall Response: Thank you for the written GEF Comments. The Bank and UNEP teams appreciated the meeting held with the GEF Secretariat on September 23, 2025, which went over the GEF Comments. The team explained the ambition of the project, the WB-UNEP complementing institutional roles, the compatibility of technical approaches with GEF concepts, and implementation arrangements. In short, the meeting agreed to i) create a better presentation, ii) clarify the "two-project approach", iii) strengthen regional dimensions, iv) present a fuller picture of co-financing, and v) international water linkages. The detailed meeting notes are available separately. The resubmission reflects decision in the meeting and the comments and responses in this table.

Overall, the project design passed through the Bank's internal procedures. During the Project Concept Note (PCN) and Regional Operations Committee (ROC) meetings, peer reviewers provided inputs to the PDO and the project components taking into consideration the limited amount of funds allocated to address the pollution and biodiversity challenges by the Caspian Sea. As such, the project crafted multi country and country activities, outputs and outcomes. These approaches were proposed and discussed with the countries.

(i) **Executing Entities:** Thanks, this is addressed. The acronyms have been spelled out in this section and indicated UNEP in connection with TCIS where appropriate, and where this link was not already explicitly stated

(ii) **Project Sector:** Thanks, this is addressed.

(iii) **Sources:** the revised co-financing is now \$86.2m and explained in the resubmission. **Additional mobilization:** While the project at the inception can appear limited, note that the project in Comp 1 and Comp 2 includes design features to create innovative financing instruments and engage the private sector. **Partners:** the community of NGOs, CSOs in Turkmenistan and Azerbaijan working on the themes of the project is very limited. **In-kind finance by countries:** The project activity description includes the expected in-kind role and contribution of countries to the project. **WB Loan and project area:** the rail project included indicatively as co-finance at PIF stage is not located in the project area that is now refined and presented in the final design of the project.

November 6:

Dear GEF Secretariat, Thank you for the feedback provided on November 4, following which we have made the requested changes to the package. Please let us know if you would like to receive the tracked version in Word as that may facilitate your review. With kind regards from the WB-UNEP Co-Implementation Team.

Thanks, the two mentioned references have been deleted.

Thanks, text eluding two projects has been removed throughout the document.

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

Secretariat comment at CEO Endorsement Request 8th of September 2025 (thenshaw): Yes

Agency Response/a

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

8th of September 2025 (thenshaw):

(a)

(i) Please correct "The proposed project financing is US\$ 11.7 million Grant, of which the World Bank Board will approve a US\$8.24 million Grant to be executed by UNOPS, while a US\$3.5 million grant is to be implemented independently from the Bank by UNEP through the Tehran Convention Interim Secretariat (TCIS)." to "the project will be co-implemented by World Bank and UNEP and executed by UNOPS and the Tehran Convention Interim Secretariat (TCIS).

(ii) Please correct "The World Bank will support national activities aimed at strengthening the capacity of Azerbaijan, Kazakhstan, and Turkmenistan to monitor and manage pollution and biodiversity in the Caspian Sea" to include "at the transboundary level".

Please also change "The World Bank will support" to "The World Bank will implement..."

Please also change "The UNEP will finance" to "UNEP will implement...."

(iii) Please see comments below on Global Environmental Benefits and adjust the summary paragraph accordingly.

(b) No. The summary needs to be revised in line with revision to comments.

28th of October 2025 (thenshaw):

(a) The summary has improved. However, the following comments are still not properly addressed.

(i) Not addressed. Please remove "The proposed project financing is US\$ 11.7 million Grant, co-implemented by the World Bank (US\$8.24 million Grant) and UNEP (US\$3.5 million grant)."

(ii) Not addressed. The text still reads : "The World Bank will support regionally coordinated national activities aimed at strengthening the capacity of Azerbaijan, Kazakhstan, and Turkmenistan to monitor pollution and create marine protected areas for biodiversity in the Caspian Sea and will be executed by UNOPS. UNEP will finance regional assessments for capacity-building in transboundary policy harmonization and cooperation on pollution management and biodiversity conservation and will be executed by the Tehran Convention Interim Secretariat (TCIS) provided ad interim by the UNEP Regional Office for Europe."

To clarify this comment, please rephrase this as "The project will support.... and The project will finance....". The breakdown of which Agency is implementing what can be left to the institutional arrangements section of the document; however, this is a GEF project and not "financed" or "supported" by the Agencies.

(iii) Partly. The Core Indicator 11 target of 950,000 direct beneficiaries is far too high. Please revise down. The PIF target was 200,000 people and is probably even a bit high. Please include the calculation/methodology accordingly.

(iv) Please correct sentence: The project complements ongoing efforts of countries to meet the obligation of the Tehran Convention, including the Moscow Protocol (Source-to-Sea) and Ashgabat Protocol (Biodiversity) at the transboundary level.

(v) Please recast the CI7 summary sentence away from "2 regional policy frameworks validated, at least 2 (pollution monitoring and Caspian seal monitoring) National/Local reforms implemented, and engagement in IW:LEARN through participation and delivery of key products (CI7 on Shared water ecosystems under new or improved cooperative management)" to instead "one shared water ecosystem (Caspian Sea) under improved cooperative management".

(vi) Please also note in paragraph 2, ahead of "Effective solutions require both national and transboundary cooperation among Azerbaijan, Kazakhstan, and Turkmenistan in areas of strategic regional planning " that three of the five Caspian countries are participating in this project.

12th of November 2025 (thenshaw):

(i) Addressed

(ii) Addressed

(iii) Addressed

(iv) Addressed

(v) Addressed

(vi) Addressed

Agency Response

(a)

(i) Thanks, corrected. The project summary has been further adjusted.

(ii) Thanks, corrected.

(iii) Global Environmental Benefits paragraph has been adjusted.

(b) Now revised in line with the comments and to highlight the regional component's source-to-sea and integrated transboundary cooperation approach

November 6:

Thanks, the teams further worked on the summary:

(i) Sentence removed.

(ii) Done.

Addressed accordingly.

(iii) The indirect beneficiaries of the regional component were incorrectly added to the direct beneficiaries (750,000 people). The new total of direct beneficiaries has been updated to 204,290 people, assumptions provided. The calculation methodology is explained below the Core Indicator table in Section ?Explain the methodological approach and underlying logic to justify target levels for Core and Sub-Indicators?.

(iv) The word ?at? has been added now.

(v) The CI7 summary sentence has been updated.

(vi) A sentence has been added to clarify that out of the five Caspian Sea riparian countries, three countries (Azerbaijan, Kazakhstan, and Turkmenistan) are participating in the project.

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 MSPs up to \$2 million) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

8th of September 2025 (thenshaw):

- (a) The new objective is not concise. Please simplify.
- (b) The presentation (Components, Outcomes and Outputs) of the revamped project is underwhelming. Please recast overall project architecture phrasing to raise the ambition to deliver a much more robust set of GEBs than what is currently targeted.

Component 1

- (i) Please explain why Component 1 is classified "Investment". The outputs are Technical Assistance.
- (ii) "1.1.1 National programs of action consistent with the ?common and comparable approach? developed to help countries meet obligations made to the Tehran Convention Moscow Protocol." Please explain why this only included "developed" and not "early implementation supported". Early implementation support should be part of this output.
- (iii) "1.1.3 Marine pollution monitoring schemes updated in AZ, KZ, TM (gaps analysis, tools and equipment, capacity-building)." Please clarify how gap analysis, tools and equipment and capacity building lead to updated pollution monitoring schemes. Please expand language of output accordingly.
- (iv) "1.1.4 National information platform for sharing information, collaboration and cooperation established through awareness/outreach activities." Is this a national platform for each country? It is not clear. Please also clarify what the platforms are for? Pollution monitoring?

Please explain why this component has been reduced to \$3.5M, down from \$4.9M at PIF stage.

Component 2

- (i) Please explain why Component 2 is classified "Investment". The outputs are Technical Assistance (first two outputs include the phrase "Technical Assistance").
- (ii) It is not clear what "Technical assistance completed to draft policies, charter, and laws to update legal status and management of MPAs in focus countries." Please make this measurable. Also, there is no recipient of technical assistance included in this output phrasing.
- (iii) Likewise for "2.1.2 Technical assistance completed to prepare Marine protected areas (MPAs) management plans." Please make this measurable. Also, there is no recipient of technical assistance included in this output phrasing.
- (iv) For "Studies completed to understand ecosystems, evaluate and propose conservation measures for flagship species indicative of Caspian Sea viability: the Caspian seal and sturgeon populations." Any new studies funded with GEF funds must be accompanied by an output where the recipients utilize the studies. Please include this language in the output. The output needs to be more ambitious than "studies completed".

(v) "2.1.4 Delivery of Marine protected areas management training (METT Training), knowledge exchange" for whom? This output is vague.

(vi) "TA and equipment delivered to strengthen national MPA monitoring & management in accordance with the Tehran Convention Ashgabat Protocol on Biodiversity." Who is receiving this "TA and equipment"? Please include in output.

(vii) "Pre-feasibility study on one selected biodiversity finance instrument." What does this lead to? The output needs to be more ambitious than a pre-feasibility study to deliver GEBs. Given the \$4.2M allocated to this component, there must be more ambition in this output to justify the large allocation for the component.

Component 3

(i) "Component 3: Regional cooperation mechanisms in the Caspian Sea region to address pollution, biodiversity loss and climate change". Please match parallelism of Components 1 and 2, which start with an action "Strengthening"....

(ii) "3.1.2 Regional frameworks for policy coherence co-designed addressing pollution, biodiversity conservation and restoration, climate adaptation and sustainable blue economy". What is meant by "regional frameworks? Does the region need more frameworks? Please correct "restauration".

(iii) "3.1.3 Capacity-building to support the application of regional frameworks for policy coherence and Sustainable Blue Economy delivered" . See (ii) above. It is not clear what this capacity building is for. Please be more specific on meaning of regional frameworks.

(iv) "3.1.4 Regional knowledge exchange and outreach established" for what?

(c) Gender dimensions: There are no gender aspects included in the project architecture (outputs). This is a GEF Policy requirement. Please revise.

Knowledge management: See comments above on specific outputs re: KM. Outputs need specificity.

M&E: \$193,000 seems low for M&E activities for a \$13M investment, especially across two Implementing Agencies. Please confirm this figure is adequate. Please separate out M&E activities into distinct outputs.

(d) Yes, but see (e)

(e) On the GEF and co-financing resources allocated to PMC: the current level the contribution is 3.9% and 4.0% respectively. Please increase this up to the 5% threshold so more resources can be utilized for the project's execution costs.

28th of October 2025 (thenshaw):

(a) Addressed

(b) The project overview table and the project description do not match. The project overview table does not include subcomponents, which are presented in the project description. Please revise.

In the Agency response, it is noted that "three new marine protected areas totaling 278,837 hectares is created in connection the project, doubling the size of protection of the Caspian Sea. " yet elsewhere in the document it is noted that there will be two new marine protected areas and one improved. Please clarify document.

Component 1: Please align project description with Project Overview Table outputs. The current project description introduces a narrative that includes subcomponents for each country and not

outputs 1.1.1, then 1.1.2, then 1.1.3 etc. Please construct the narrative as "Output 1.1.1 will ". Output 1.1.2 will.....". Please follow the project description presentation of Component 3.

Component 2: Please align project description with Project Overview Table outputs. The current project description introduces a narrative that includes subcomponents for each country and not outputs 2.1.1, then 2.1.2, then 2.1.3 etc. Please construct the narrative as "Output 2.1.1 will ". Output 2.1.2 will.....". Please follow the project description presentation of Component 3.

Component 3: Please number the Outputs in the project description to match the project overview table: 3.1.1, 3.1.2., etc.

(c) "The project's gender expert will ensure that the training is gender responsive." is not enough. Please include specific activities on gender aspects/women empowerment under the capacity building output. It is a GEF policy requirement that gender dimensions must be embedded across project components, with discrete activities. Please revise document accordingly.

(e) The co-financing contribution to PMC is now over 6%. Please make proportional to GEF project financing contribution to PMC = 4.6%.

Please confirm that 1% of project budget will go to IW:LEARN activities, which is a requirement for GEF IW funding. This includes participation at the GEF International Waters Conference.

12th of November 2025 (thenshaw):

(b) Addressed

(c) Addressed

(e) Addressed

Agency Response

(a) The objective has been made more concise while avoiding changing the objective approved by the Bank Regional Operations Committee (ROC) meeting on June 18, 2025.

(b) The presentation has been revised to reflect: (i) an aim to lay a foundation for a better understanding of pollution in the Caspian Sea by establishing a standardized approach that can be compared across countries. This information is important to understand the source of pollution, methods and costs for tackling pollution; (ii) similarly on biodiversity, the project is designed to establish and practice comparable methodology to assess biodiversity (for example counting of Caspian seal so they do not get double counted), (iii) three new marine protected areas totaling 278,837 hectares is created in connection the project, doubling the size of protection of the Caspian Sea.

Component 1

(i) The Bank instrument applied to this project is IPF (Investment Project Finance) and can include technical assistance. This has not changed since GEF PIF stage. However, to meet the request from the GEF Sec, in the project overview table, the Team has separated activities related to purchase of equipment (?investment?) from technical assistance for Components 1 and 2.

(ii) The ?Common and Comparable Approach? has been renamed to bring clarity as requested by the Bank ROC Meeting and to better reflect the ambition of the project by GEF Sec. The approach is

now called 'Impact Accelerator' to reflect Architecture (co-design), Practice (implementation), and Scale-Up (foundation for increasing finance post-project). Hence, early implementation support is now included.

At PIF, only indicative activities and cost estimates were indicated.

Component 2

(i) The Bank instrument applied to this project is IPF (Investment Project Finance) and can include technical assistance. This has not changed since GEF PIF stage. However, to meet the request from the GEF Sec, in the project overview table, the Team has separated activities related to purchase of equipment ('investment') from technical assistance for Components 1 and 2.

(ii) The recipient of technical assistance is the counterpart government agencies concerned for pollution and biodiversity in each country. The text has been clarified to reflect this.

(iii) The recipient of technical assistance is the counterpart government agencies concerned for pollution and biodiversity in each country. The text has been clarified to reflect this.

(iv) The overview table was updated

(v) To the government agencies responsible for the selected MPA in each country.

(vi) The government agencies responsible for the selected MPA in each country.

(vii) The pre-feasibility is the preliminary, high-level assessment of the finance instrument's viability and is done by the project to guide the country (one pre-feasibility per country) in the finalization and execution of the financing instrument which is a sovereign act of the concerned government.

Component 3

(i) The name of the component 3 adjusted as per recommendation and the adjustment reflected throughout the CEO ER package.

(ii) In this context, 'regional frameworks' means jointly developed, multi-country instruments under the Tehran Convention that align how Caspian states plan, coordinate, and implement policy on shared issues (pollution, biodiversity, climate adaptation, blue economy). They are typically non-binding, operational guides—not new treaties—designed to: set common objectives and principles; define roles and coordination channels; harmonize standards, methodologies, and SOPs; organize data sharing. The word 'framework' was used internally given that it is an umbrella term that signals coordination without creating new legal obligations. It accommodates different instrument types (strategy, programme of action, guidelines/SOPs, cooperation mechanism) under one banner, which is useful when multiple outputs must align across countries and sectors. 'Framework' also conveys flexibility and iterability—it can be co-designed, piloted, and updated as evidence and politics evolve—while still setting common objectives, roles, standards/methods, data-sharing rules, and monitoring arrangements.

(iii) Clarification on the meaning of 'regional frameworks' was added, specifying that these refer to governance mechanisms, protocols, strategies, and tools developed under the Tehran Convention and related regional action plans, which the capacity-building activities will help operationalize.

(iv) The proposed 'Regional knowledge exchange and outreach' ensures the evidence and tools generated under Outputs 3.1?3.3 are actually used: this output translates assessments, guidelines, and training materials into practice and policy across the five littoral states by (i) strengthening the CEIC as the region's open hub for standardized methods/data; (ii) packaging and disseminating practical toolkits to practitioners; (iii) delivering targeted outreach to decision-makers so findings inform

regulations, investments, and monitoring; and (iv) enabling cross-country learning and replication via lessons-learned exchanges and contributions to GEF IW:LEARN/RSCAPs.

(c) While the project outputs themselves are formulated at a high strategic level and therefore do not explicitly contain gender qualifiers, gender dimensions are fully integrated into the project's design, implementation, and monitoring architecture. Gender considerations are addressed across multiple sections of the CEO Endorsement document, including in the gender section and socio-economic benefits, stakeholder engagement, sustainability, and M&E framework. Dedicated budgetary resources are also allocated for a gender expert, and gender-disaggregated indicators will be tracked throughout the project cycle.

Most importantly, the UNEP appendices package provides the detailed framework for gender-responsive implementation. Appendix 6: Gender, Stakeholder Plans, Stakeholder Response Mechanism (SRM) and Personnel ToRs (Attachment 6a: Gender Analysis and Action Plan) sets out the concrete gender actions, responsibilities, and monitoring mechanisms that will guide delivery of gender outcomes across all components. This ensures that gender is mainstreamed in practice, even if not expressed directly in the architecture of outputs, and that the project will deliver measurable contributions to gender equality and women's empowerment.

Knowledge management: New information added regarding the Knowledge Management approach in "Knowledge Management and Communication Strategy" section.

M&E: UNEP has increased M&E by approximately USD 10,000 to allocate more budget to MTR and TE of the Regional Component.

November 6:

(b) Thanks. As discussed and noted earlier, the Bank cannot deviate much from the Project Appraisal Document (PAD) but we tried to address these comments as much as feasible for Components 1 and 2, reorganizing the narrative to outcomes and outputs, and making it aligned with the overview table.

The project supports three MPAs. The two new are Absheron (AZ) and Garabogaz (TM). The third is Itbalygy (KZ) which was created on paper on Nov 24, 2024, during the preparation stage of the project. Its legal status and governance are to be further supported by the project. Reflected in the project description and where relevant. Hence, for all intents and purposes, the Itbalygy (KZ) is a new marine protected area.

Component 3. The numbering of outputs and activities has been updated in the project description and the rest of the document and UNEP appendices so that it matches the project overview.

(c) Thanks, the gender-related activities and actions were added as part of the project description. The teams brought the actions and indicators from the Gender Action Plan directly to the project description, as well as part of M&E elements, including the Results Framework.

(e) Thanks, the co-financing contribution was corrected in line with the PMC 4.6%.

The project includes various targeted and documented contributions to the GEF IW:LEARN, such as knowledge sharing, experience notes, twinning programme and participation in global learning exchanges, including the GEF International Waters Conference(s) (IWC). The required 1% budget allocation is mostly covered under Component 3 (and output 3.1.4) under budget lines linked to KM activities, as well as travel and staff, but with contribution and active participation from all project components.

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

8th of September 2025 (thenshaw):

(a) The key barriers graphic is not legible. Please upload a high resolution image so reader can understand the impacts, problem, root causes, barriers and drivers that are depicted.

(b) The roles of all stakeholders and how they will contribute to GEBs and other project outcomes needs to be better articulated. This can initially be presented in a table format and then needs to be fully fleshed out in the project description. Please revise.

(c) N/A

28th of October 2025 (thenshaw):

(a) Addressed

(b) Not addressed. The roles of all stakeholders and how they will contribute to GEBs and other project outcomes needs to be better articulated. This can initially be presented in a table format and then needs to be fully fleshed out in the project description. Please revise. This is in reference to the Portal document, not the SEP.

12th of November 2025 (thenshaw): Addressed

Agency Response

(a) The higher resolution image of Figure 1 has been included in the document, under the Project Rationale section

(b) The role of stakeholder is included in the project description part but detailed in the SEP (41 pages document only on the Bank side), including the strategy for information disclosure and consultation.

November 6:

(b) A table was added to the bottom of the project rationale to address this comment. The project description has been updated in line with the table to further clarify the roles of stakeholders in the project intervention and how this contributes to the GEBs.

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) Are the global environmental benefits and/or adaptation benefits identified?

e) Other Benefits: Are the socioeconomic co-benefits resulting from the project at the national and local levels sufficiently described?

f) Is the financing presented in the annexed budget 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

8th of September 2025 (thenshaw):

(a) The Theory of Change Diagram needs to be revised once comments above on project components and outputs are addressed.

The diagram is missing environmental problems, key barriers and assumptions (and elaborated pathways of change accordingly). Please revise.

(b) No, please include a description of how the GEF alternative will build on ongoing/previous investments. This aspect of the baseline is not established.

(c) The project description is not presented as a set of activities per output, in line with the project architecture table. Please revise project description so reviewer can properly assess. **The project description must be presented in line with the project architecture of component, outcome and output, not "sub-components".** A full review of the project description will be conducted on revision.

Critical assumptions are not included in the CEO document. Please include.

The project description of M&E is insufficient. Please detail specific activities

(d) The GEBs are weak for this investment. Please see comments on Core Indicators and revise accordingly.

(e) The socioeconomic benefits section of the document does not really discuss socioeconomic benefits in any detail. Perhaps this is due to only 4,000 direct beneficiaries targeted. Please revise.

(f) It is not clear if a cost-effective approach to PMC has emerged following the partial transfer of this project. Clear budget, TORs and description of roles and responsibilities is required. Please revise.

(g) Yes

(h) No. Specific stakeholders must be better identified and their roles and responsibilities for project delivery explained.

(i) No. Gender analysis is partially missing. Gender aspects are not adequately mainstreamed into project architecture. Please revise.

Please clarify how the individual reports described in the Gender section and captioned below will be reported to the GEF (i.e., will they be reported PIRs, MTR, TE?).

Each agency will report on progress toward gender equality and women's empowerment, highlighting inclusive participation in their respective interventions. Gender-disaggregated indicators will be used, where applicable, to monitor and evaluate the effectiveness of gender-related actions. The results will be regularly tracked and reported in line with the institutional frameworks and reporting requirements of each implementing agency.

To measure the effectiveness of the proposed gender actions, the projects will disaggregate respective intermediate results indicators (IRIs), with gender-disaggregated results and outcomes will be monitored and reported regularly.

Please clarify response to "Generating socio-economic benefits or services for women". It seems like the project is addressing this too. Agencies are requested to provide a Yes or No response.

(j) Yes, but narrative needs to be improved.

(k) To be determined

(l) To be determined

25th of October 2025 (thenshaw):

(a) Addressed

(b) Agency has not indicated how this comment was addressed

(c) The project description is not presented as a set of activities per output, in line with the project architecture table. Please revise project description so reviewer can properly assess. **The project description must be presented in line with the project architecture of component, outcome and output, not "sub-components".** A full review of the project description will be conducted on revision.

Critical assumptions addressed.

(d) Please see comments on Core Indicators and revise accordingly.

(e) Addressed

(f) See institutional arrangements comments

(h) See stakeholder comments in above section

Agencies mention UNEP component, but what about the stakeholder roles and responsibilities for the WB components?

(i) For gender reporting, please include how this will be done directly in the project document.

14th of November 2025 (thenshaw):

1. On gender: When asked about to please respond on Generating socio-economic benefits or services for women, the Agency has answered that this is not covered by the project. However, this is inconsistent with other explanations given at the review sheet, such as their response

that says: "More explicit inputs were made to highlight how women's inclusion and empowerment in project activities (pollution monitoring, biodiversity management, fisheries, aquaculture, eco-tourism, and Blue Economy sectors) will not only address gender gaps but also create income-generating opportunities, green jobs, and strengthen community resilience. This links gender considerations directly to socio-economic benefits in the Caspian Sea region."

Or given what is in the project description, that states the following: "The project's gender-responsive approach is also expected to generate tangible socio-economic benefits by improving women's access to training, technologies, and financing in pollution monitoring, biodiversity management, and conservation activities. These measures will help create new opportunities for women in coastal communities, particularly in fisheries, aquaculture, and eco-tourism, thereby enhancing household incomes and strengthening local economies."

We request the Agency for some consistency in their responses, and to please respond Yes to "Generating socio-economic benefits or services for women", as this a requirement in GEF Gender Policy and Guidelines, as well as in the template, to better track the activities and outcomes within the projects.

19th of November 2025 (thenshaw): Addressed

Agency Response

(a) Adjusted, to be further revised after GEF SEC review of the resubmission

(c) While the Bank team tried to adjust the structure/ presentation, we will not be able to change the PAD. We included outcomes in the project description directly, however, can't deviate the narrative and presentation substantially from the Bank's documents.

D or C (critical assumptions)

The project critical assumptions have now been explicitly articulated to ensure clarity on the conditions necessary for achieving outcomes. They complement the identified risks and reflect the enabling factors on which the project's theory of change is built, including political commitment, availability of baseline data, inclusive stakeholder engagement, and the adoption of at least one regional framework and roadmap. Key risks are identified in the CEO Endorsement document in a dedicated section, and further detailed in the UNEP appendices package, specifically Appendix 4: Logical Framework and GEB Breakdown, where risks and assumptions are presented for each output.

(d) The core indicators description and indicators are reviewed and corrected to better reflect the aim of the project.

E or F (socio-economic benefits)

The socio-economic benefits section was further elaborated to go beyond the previously described institutional and capacity-building benefits. It now specifies the direct and indirect socio-economic benefits at the local and national levels, such as strengthened fisheries management, sustainable tourism opportunities, and economic diversification through Blue Economy sectors. At the global level, the text was expanded to highlight contributions to biodiversity conservation and climate adaptation, as well as the generation of lessons learned, best practices, and knowledge products that

can be shared with other regions facing similar challenges. These additions make clear how the project supports local livelihoods, national economic resilience, and global environmental benefits.

f) TORs and description of roles and responsibilities under the component 3 is provided in the document and can be found on page 44

I or H (stakeholders)

For the regional (UNEP) component, the identification of stakeholders and the description of their roles and responsibilities are included in the project description. In addition, the UNEP appendices provide a comprehensive package that outlines the stakeholder-related elements of the project, including Appendix 6: Gender, Stakeholder Plans, Stakeholder Response Mechanism (SRM) and Personnel ToRs, with Attachment 6b: Stakeholder Engagement Plan and Attachment 6c: Stakeholder Response Mechanism (SRM). These documents identify the relevant stakeholders - national and local authorities, regional institutions, civil society organizations, community groups (including women's groups and youth organizations), private sector actors (notably the oil and gas sector, fisheries, and tourism industries), and academia - and clarify their specific roles in project delivery.

Gender analysis is briefly summarized in the project description section but detailed in the GAPs for respective parts (WB and UNEP). WB GAP (executed by UNOPS) was further updated and re-attached.

Monitoring and reporting on gender will be done in line with the GAP. As per the GEF SEC PIRs, MTR, and TE reporting templates, the gender-related activities and progress will be reported in line with the standard requirements. During the project implementation period, the Bank is assessing and documenting the implementation progress every 6 months.

?Generating socio-economic benefits or services for women? - This is not covered by the project

Additionally, J or I (Gender)

The data both in UNEP appendices (Appendix 6: Gender, Stakeholder Plans, Stakeholder Response Mechanism (SRM) and Personnel ToRs - Attachment 6a: Gender analysis and action plan) and in CEO Endorsement document was updated according to the new World Economic Forum Gender Gap report 2025.

More explicit inputs were made to highlight how women's inclusion and empowerment in project activities (pollution monitoring, biodiversity management, fisheries, aquaculture, eco-tourism, and Blue Economy sectors) will not only address gender gaps but also create income-generating opportunities, green jobs, and strengthen community resilience. This links gender considerations directly to socio-economic benefits in the Caspian Sea region.

The detailed and core information on gender is provided in the UNEP appendices package (Appendix 6: Gender, Stakeholder Plans, Stakeholder Response Mechanism (SRM), and Personnel ToRs ? Attachment 6a: Gender Analysis and Action Plan), which forms the framework for gender-responsive implementation across all project components.

November 6:

(b) A paragraph on how the GEF alternative will build on ongoing/previous investment is included under the project description section, with further elaboration in the section on coordination with other ongoing initiatives and projects..

(c) Thanks. As discussed and noted earlier, the Bank cannot deviate much from the Project Appraisal Document (PAD) but we tried to address these comments as much as feasible for Components 1 and 2, with the project description now following the outcomes and outputs narrative as per the overview table.

(d) Thanks. The Core Indicators section was updated accordingly (and text where relevant).

(f) Thanks, considered as part of the institutional arrangements responses.

(h) Thanks, the teams further worked on stakeholders part and adjusted the project document, the stakeholders have been identified and their roles and responsibilities for project delivery explained and now better articulated. The updated SEP is uploaded.

(i) Thanks. Gender has been further integrated in the results framework and project description. The document also mentions that the M&E reports will also provide details on the progress made as part of the Gender Action Plan actions and respective indicators, with regular data collection across all components.

November 18:

Corrected. There is no option to select "yes" but the box is now checked for "Generating socio-economic benefits or services for women".

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?**
- b) Comment on proposed agency execution support (if agency expects OFP 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

8th of September 2025 (thenshaw):

(a)

(i) Please explain what a "a national BCSP Focal Point" is.

(ii) What does "ensure cohesiveness of the two projects" and "in project operations of the World Bank and UNEP projects respectively" mean? It is concerning if the proponents see this IA transfer as now creating two projects. Please remove all these references and speak with GEF Sec to clarify. This is one project only.

It is not permitted to have two steering committees. "The Steering Committee for the WB project will be co-chaired by representatives of the three countries alongside UNOPS. UNEP and the World Bank will be invited as observers. The Steering Committee for the UNEP project will be co-chaired by the same representatives of the three countries as for the WB project, alongside UNEP. UNOPS and the World Bank will be invited as observers." One steering committee for the one project that GEF is funding. Any other arrangement will not be cleared.

(iii) Please revise arrangements diagram based on above, and also include financial flows.

(iv) A Project Management Unit housed within the UNOPS office in Austria and not in the region/countries is extremely concerning and not acceptable. A UNOPS team should be able to take up offices locally. Please adjust accordingly, as this is not good practice for effective project execution.

(v) Please include a summary paragraph for each of the staff positions that describes roles and responsibilities.

(vi) Please clarify what is meant by " UNEP will take part in the Steering Committee as a member with decision rights". What decision rights?

Please revise institutional arrangements wherein executing entities are proposed to have seats on the PSC with decision-making authority. This presents a potential conflict of interest and should be closely reviewed and revised as necessary.

(vii) Please explain "**To enhance knowledge exchange and cross-regional collaboration, the project will:** 1. Provide regular updates to co-financiers and invite them to participate in the Steering Committee" when there is only one co-financier outside the Implementing Agencies and which is a recipient country.

(viii) Please provide rationale as to why WB through UNOPS must execute the national portions. This is also not explained in the relevant section, which describes UNOPS involvement thus far in Caspian Sea initiatives writ large, but not why UNOPS is preferred to any other Regional partner in terms of project execution.

(b) No. Please provide the justification for the proposed self-execution arrangement and what the firewalls/operational arrangements are that have been communicated to GEF Sec.

(c) (i) Please clarify that the WACA project lessons are being used for Caspian.

(ii) Please elaborate on how the project will coordinate with ongoing TCIS activities.

(ii) How is the project planning to coordinate with other recent GEF investments, namely ID 11524 Integrated Management of Seascapes of the Kazakhstani part of the Caspian Sea and Land Resources of Adjacent Territories. Please confirm that a coordination meeting has taken place with the proponents of this project and include a coordination approach in the project document on this coordination. The projects were approved in the same Work Program.

(iii) Please indicate how the project will coordinate with those projects listed in the table.

28th of October 2025 (thenshaw):

(b) Please move the following to the justification section: "**Justification for self-execution and firewalls/operational arrangements:** Under the co-implementation setup with the World Bank and UNEP, the regional component self-execution of the regional component under a co-implementation setup with the World Bank to capitalize on UNEP's comparative advantage as the Tehran Convention Secretariat's convening power across the five littoral states, alignment with Convention frameworks, and on-the-ground capability of the Regional Office for Europe (ROE/TCIS) while ensuring delivery remains fully within UN/GEF standards. Under this arrangement, the World Bank leads the two national components, whereas UNEP implements only the regional component (executed by TCIS/ROE). Recognizing that internal execution is generally limited to exceptional cases, UNEP will take necessary measures to separate implementation and execution duties to ensure segregation of accountability and financial management roles. UNEP Ecosystems Division will serve as the Implementing entity, and TCIS (UNEP Europe Office) as the executing agency. UNEP's implementation and supervision of the regional component would be strictly covered by the Agency Fee. TCIS's role as executing agency for the regional component and associated budget, and accountability for the execution of its activities, will be clearly defined in the Internal Cooperation Agreement (ICA) between UNEP Ecosystems Division and UNEP Europe Office. Firewalls and operational safeguards include: segregation of implementation and execution functions between agencies; explicit designation of responsible UNEP roles (Director/GEF EC/Portfolio/Task Manager) and adherence to UNEP's Accountability Framework (projects internally executed are treated as 'projects at risk,' triggering enhanced fiduciary oversight and segregation-of-duties controls); early consultation and justification of modality, and letters/support clarifying partner roles per GEF guidance. These measures ensure independence of decision-making, transparent fiduciary controls, and avoidance of conflicts of interest while leveraging UNEP's unique position to deliver regional cooperation results."

Please spell out "BCSP" for reader clarity.

12th of November 2025 (thenshaw): Because UNEP is serving in a self-execution capacity in this project, the decision rights reference must be removed to avoid a potential conflict of interest. Please revise.

14th of November 2025 (thenshaw): Addressed

Agency Response

The Institutional arrangement section was revised and adjusted.

More details:

(v) Summaries for respective roles and responsibilities of UNEP staff positions are added to the Institutional Arrangement and Coordination with Ongoing Initiatives and Project section

(vi) The reference to 'decision rights' applies specifically to UNEP as the GEF Implementing Agency under the International Waters portfolio, not to UNEP/TCIS as the Executing Agency. As Implementing Agency, UNEP has the authority to ensure that the project remains aligned with GEF requirements, fiduciary standards, and agreed work plans. By contrast, TCIS, in its capacity as Executing Agency, does not hold such decision-making rights but instead manages and executes activities in line with the approved project design and guidance from the Steering Committee.

b) The paragraph titled 'Justification for self-execution and firewalls/operational arrangements (as communicated to the GEF Secretariat)' has been inserted under the section 'Institutional Arrangement and Coordination with Ongoing Initiatives and Project', reflecting the agreed internal-execution modality and safeguards.

c)

(ii) An explanatory text has been added under a sub-heading 'Coordination with Ongoing TCIS Activities'.

(iii) An explanatory text has been added in the relevant section with the Table

(iv) The rationale for the project management arrangements were explained to the GEF Sec in the September 23, 2025 meeting and accepted as is. The text has been improved to better represent the arrangement.

(v) Addressed in the text

(vi) Text now improved

(vii) Explained in the September 23, 2025 meeting with the GEF Sec and understood and agreed. UNOPS historic role is now better described.

(cc) (i) Lessons from the design of the WACA program has informed the design of the Caspian Sea project by (a) including a focus on outcomes related to coastal resources by protection of habitat and providing information on pollution, and (b) for the regional cooperation synergy among different regional initiatives?the Tehran Convention (a UNEP Regional Seas Convention), and (c) using the project as a platform for scale up via partnerships with national and international organizations.

(ii) UNDP is accessing \$8.0m of GEF finance over 6 years for Kazakhstan and has MENR as an implementing partner. The project, 'Integrated Management of Seascapes of the Kazakhstani part of the Caspian Sea and Land Resources of Adjacent Territories'. The areas of synergy are (i) Protected areas management in the Mangistau Region and Atyrau Region. UNDP will support the management effectiveness of about 3 million hectares of the protected areas system through development of management plans with finance section, development of eco-tourism strategies, and capacity building, and (ii) support to Scientific Research Institute of the Caspian Sea (KSRICS). The World

Bank will support KSRICS in designing the architecture for pollution monitoring, data storage, data reporting. UNDP will also support the KSRICS in several areas spanning GIS, remote sensing, ecosystem monitoring, and capacity building with focus on biodiversity. The UNDP will be invited as observer to the Steering Committee meetings. A detailed description of this arrangement was developed following a meetings in March 2025 with the government of Kazakhstan, UNDP and the World Bank.

(iii) now detailed in the table.

November 6:

(b) The paragraph has been moved to the justification section as suggested
The acronym BCSP is no longer used in the document.

November 14:

The section ('Institutional arrangements') has been revised and reference to UNEP's full decision rights has been removed.

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 ambitious yet realistic?

Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request

8th of September 2025 (thenshaw):

(a) No, please see below.

(b) No. The Core Indicators are underwhelming for a \$13M investment. The targets need to be revisited and increased significantly.

(i) CI 11: The direct beneficiary target is far too low (4,370 people). 200,000 people were targeted at PIF stage. This figure should be restored.

(ii) CI 7: IW:LEARN engagement should be "1" not "2". Please also explain why CI 7.2 is rated "3". It should be "1" as noted at PIF.

(iii) CI 5.2 should be targeted, as this investment will lead to reduced pollution in an LME.

(iv) CI 5. The explanation is that this total hectare count of 179,655 ha is "Area of marine habitat under improved practices, the indicator will target the strengthened pollution monitoring in the existing MPAs: 786 ha of Absheron National Park in Azerbaijan; 108,632 ha of Caspian Itbalygy State Nature Reserve in Kazakhstan; and 70,237 ha of Garabogaz Wildlife Sanctuary in Turkmenistan." Given this target pertains to MPAs, it should be included under CI 2, not CI 5. Please revise. Please also explain the increase from PIF stage.

(v) It appears the CI 2 and current CI 5 targets may be double counting each other. Please explain how they are different. See above (CI 5 target ha should be moved to CI 2).

(vi) It is concerning that CI 1 is no longer targeted, which was 50,000 ha. It is important that this project take a source to sea approach; therefore, the terrestrial core indicator should be targeted. Please revise.

(vii) Under CI.2.1, please include the WDPA ID for the Garabogaz Wildlife Sanctuary

*Please include a mapping of how the project activities will lead to these GEBs. Please also include the revised Core Indicator targets in the project summary.

28th of October 2025 (thenshaw):

CI 7: IW:LEARN engagement should be "1" not "2". It should gradually lead to "4" at project completion. All IW projects start at "1".

CI11 Core Indicator target is far too high at 950,000. Please revise down in line with PIF stage. Please do not count "expected indirect beneficiaries resulting from the regional component are 750,000 people."

12th of November 2025 (thenshaw): Addressed.

Agency Response

The GEF-8 Core Indicators part was further updated, including the targets covered by the project.

CI5 was removed to avoid double counting, however, a note was added that it will be further explored.

We had planned to include CI 5.2, as the project will indeed lead to reduced pollution in the Caspian Sea. However, Caspian Sea is not listed in the portal and not part of the LME list provided on IW:LEARN (<https://iwlearn.net/marine/lmes/list>). It cannot be manually added to the portal either. Therefore, we removed this indicator.

For CI1, additional explanation was added.

CI 7.4: Level 2 rating is retained for the indicator and an explanation provided under the 'Core Indicators' section. The project will update the CEIC website in line with IW:LEARN guidance

CI 7.2 is now rated 2, as at least two regional frameworks under output 3.2 will function as regional agreements. A detailed explanation provided under the same section.

The project has been adjusted to strengthen its source-to-sea approach, now reflected in both design and terminology - including the revised naming of outputs under Outcome 3. The project scope has expanded to include both marine and terrestrial (coastal) protected areas, recognizing their ecological interlinkages. While the terrestrial component focuses solely on improving management effectiveness of existing protected areas, the marine component covers both the creation of new areas and improved management of existing ones. This ensures comprehensive ecosystem connectivity from land to sea while maintaining the project's primary focus on the Caspian marine environment.

WDPA IDs are not available for all areas.

November 6:

Re CI7: 7.4 has been reduced to 1 in the project document and all UNEP appendices.

Re CI11: This comment is addressed, assumptions have been provided

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

8th of September 2025 (thenshaw):

Risks will be assessed once project document is aligned with format of project descriptions of other GEF IW projects.

*Under Stakeholder category, please include the risk of a lack of sources of co-financing leading to ineffective partnership mobilization for the countries.

28th of October 2025 (thenshaw): Addressed

The risk matrix states "The project supports one recently created, and two proposed Marine Protected Areas (MPAs)" , yet the project description states that three new MPAs will be developed. Please clarify.

The UNEP SRIF states that the project is low risk, yet the WB appraisal ESRS and the matrix states high risk. Please explain/align.

12th of November 2025 (thenshaw): Addressed

Agency Response

Re risks. Additional information regarding the role of non-beneficiary countries? engagement and integration in the project has been added to the risks table and the institutional arrangements section.

November 6:

The project supports three MPAs. The two new are Absheron (AZ) and Garabogaz (TM). The third is Itbalygy (KZ) which has been created on paper on Nov 24, 2024, during the preparation stage of the project. Its legal status and governance are to be further supported by the project. The risk matrix was updated.

Both the UNEP SRIF and the WB appraisal ESRS only cover their respective interventions (C1&2 for WB and C3 for UNEP) as per their internal policies. The overall project risk indicated as substantial in line with the high risk coming out of the WB assessment and a higher risk of ESRS as per the WB ESF policies and procedures.

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 N/A

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 **8th of September 2025** (thenshaw): Yes

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 **8th of September 2025** (thenshaw): Yes

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 **8th of September 2025** (thenshaw): Yes

Agency Response

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request **8th of September 2025** (thenshaw):
Please see comments below.

Agency Response

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request

8th of September 2025 (thenshaw): Partly.

The WB GAP does not include a gender analysis, which is a GEF Policy requirement. Please include

The produced GAPs for both WB and UNEP need to be embedded in the project description and included in the overall project architecture. Please revise.

28th of October 2025 (thenshaw): Combined UNEP and WB gender analysis is now stronger. However, a results framework for gender aspects is not a full Gender Action Plan. Please revise and ensure full description is embedded in the project narrative. Please also include gender indicators and end results in the overall Project Results Framework.

12th of November 2025 (thenshaw): Addressed

Agency Response

Updated

November 6:

Thanks, the project results framework has been revised to reflect the GAP. The GAP was also further embedded into the project description under respective components. Targets for women participation can also be found in the targets column of project components in the Results framework while the CI 11 breakdown also offers more details.

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

8th of September 2025 (thenshaw):

Please update WB SEP to reflect comments on project architecture and institutional arrangements.

The WB SEP needs to be more granular by mapping stakeholders to specific project activities, rather than vague "Supporting pollution control and biodiversity management" (including roles and responsibilities during implementation). Please revise. Stakeholders are mostly identified by stakeholder type rather than specifically named. Please tease out Local Government Entities, NGOs, private sector entities, local fishermen associations, members of academia, staff of technical agencies etc. Please revise.

The UNEP SEP: Please map stakeholders to specific project activities (including roles and responsibilities during implementation).

28th of October 2025 (thenshaw): Please explain where the Agencies have done this revision. The WB SEP is from July 2025 and the project description in the Portal submission does not include specific stakeholders and what their roles are in output execution. Several stakeholder categories are vague in the WB SEP from July. The WB SEP includes subcomponents that are not aligned with the project overview table structure.

12th of November 2025 (thenshaw): Satisfactory, but reviewer notes that WB PAD subcomponents do not align with the Portal document outputs. As a condition of clearance, similar to what was asked for in the CHO-IP Moldova project, please share the Project Operations Manual with GEF Sec once developed and arrange call accordingly with GEF Sec to review project details.

14th of November 2025 (thenshaw): Addressed

Agency Response

The project activities have been carefully mapped to all relevant stakeholders, including regional and national authorities, UN agencies, private sector actors, transport and shipping companies, and aquaculture enterprises. For each stakeholder, the associated project activities (3.1-3.4) have been identified to demonstrate engagement in consultations, capacity-building, framework development, and knowledge management. This ensures that the project's interventions are inclusive, targeted, and aligned with the specific roles and mandates of each stakeholder group.

November 6:

The changes to the UNEP SEP can be found under the UNEP appendices document (appendix 6b), uploaded in the portal roadmap.

The changes to the WB SEP can be found in 'Annex ? SEP_updated Nov 2025'. The project description also includes roles of project stakeholder groups.

November 14:

This is noted and confirmed, the call will be arranged by WB.

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request

8th of September 2025 (thenshaw): Please include a signed/dated UNEP SRIF.

28th of October 2025 (thenshaw): Addressed

Agency ResponseIncluded

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

8th of September 2025 (thenshaw):

No, please adjust financing tables to reflect the partial transfer of this project from World Bank to UNEP. Only World Bank is listed in the financing tables.

The transfer for this project was approved by the CEO on August 27th, 2025. Please amend the CEO Endorsement information reflecting the new distribution of funds, as well as other changes in the narrative and tables (i. e. General Project Information, Project Description Overview) reflecting the changes.

28th of October 2025 (thenshaw): Addressed

Agency ResponseThis can?t be done on the Bank side in the GEF Portal. Request to IT was sent.
Focal Area allocation?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement RequestN/A

Agency Response

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement RequestN/A

Agency Response

SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat comment at CEO Endorsement RequestN/A

Agency Response

Focal Area Set Aside?

Secretariat comment at CEO Endorsement Request N/A

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

8th of September 2025 (thenshaw):

(i) Please provide more details on the PPG cost described as "Preparation of Project Documents".

Agency should refer to the GEF Guidelines on the Project and Program Cycle Policy (see p.10-11 for PPG eligible costs; see p. 50-53 for Agency fee eligible costs). The GEF requires that proceeds from the Agency fee are used to cover many preliminary project tasks like preparation of project concept and preparation of the detailed Project Document. Please kindly request the Agency revise the table with the eligible costs in mind, as per GEF guidelines.

(ii) In a similar manner, please provide more details on the PPG costs described as "Supporting the implementation of the Activities, including financial management and procurement, overall monitoring and reporting through the financing of Operating Costs and Indirect Costs." As above, please refer to the eligible categories included in the Guidelines on the Project and Program Cycle Policy.

28th of October 2025 (thenshaw):

Utilization must be itemized by deliverable, not consultancy types. Please detail "Consultancies and contracts to develop project options and documentation".

Please detail "ESF and Gender Analysis, developing related action plans and documents". What related action plans and documents?

"Local consultations, national discussions: Organization of project consultations and/or meetings to discuss the project design, including in accordance with the ESF". Please itemize these discussions and consultations.

12th of November 2025 (thenshaw): Please explain in table what "Development of project options" refers to.

Please include the "specific documents", referred to by Agency here in review sheet, directly into the budget line.

14th of November 2025 (thenshaw): Addressed

Agency Response

The language was revised; all activities are eligible. The Bank does not execute PPGs.

November 6:

The PPG table has been updated and is aligned with the PPG Eligible Expenditure Items listed under Table 1 (Page 9) of the Guidelines on the Project and Program Cycle Policy (2025 Update), which indicate that the report on PPG usage should be prepared using the eligible expenditure categories in Table 1.

As regard to specific documents, the PPG is used to prepare the document required for the Board approval of the project, including: Env and Soc Mgt Framework (ESMF), Resettlement Policy Framework (RPF), Labor Management Plan (LMP), Stakeholder Engagement Plan (SEP), Env and Soc Commitment Plan (ESCP), Project Procurement Strategy for Development (PPSD), Project Operations Manual, project budget.

November 14:

Thanks, "Development of project options" is mentioned in Table 1 of the GEF Guidelines for Program and Project Cycle Policy (2025 Update). The term was used to refer to "Technical design parameters", this was updated in the PPG table. The "specific documents" were added directly into the budget line in the GEF Portal.

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 Yes

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

8th of September 2025 (thenshaw):

The co-financing sources for this project is not acceptable for a \$13M GEF investment. Three sources of co-financing does not demonstrate a mobilization of partners, including from NGOs, CSOs, academia, private sector etc. Further, all participating countries should also at least provide in-kind co-financing (as was at PIF stage). It is also noted that the large World Bank loan attached to this project at PIF is now missing. Please explain.

(i) Co-financing from Turkmenistan letter must be translated to English. Please include so this co-financing can be assessed.

Please spell the name of co-financier in the co-financing table instead of country name.

(ii) Please better describe the investment mobilized from the Tehran Convention Secretariat.

(iii) Please explain why the WB loan attached to this project as co-financing is no longer included. The expectation at PIF was that this project would be tied to a major World Bank investment.

28th of October 2025 (thenshaw):

(i) "The Government of Turkmenistan provides co-financing to support the objectives of the project in the amount of TMT 194,897,220 or US\$53,000,000 equivalent". What is this co-financing? Please explain in the field below the co-financing table. The co-financing letter that is uploaded to the Portal still does not include an English translation.

"The Government of Azerbaijan through the Ministry of Ecology and Natural Resources provides co-financing support to support the objectives of the project, in particular, to strengthen capacity to

address pollution and enhance biodiversity conservation in the Caspian Sea in the amount of US\$30,000,000." Please explain this better. What are these investments?

Please explain why Kazakhstan is not providing co-financing for this project.

(ii) For the TCIS explanation below the co-financing table, please include: "The support will be delivered through the implementation of the Convention's Protocols, as well as through other intergovernmental activities including holding of Preparatory Committee meetings and Meetings of the Conference of the Parties. Moreover, the Secretariat's institutional knowledge and expertise will be leveraged to support the implementation of the project. The areas that the Tehran Convention can support the project include: a) Strengthening regional cooperation mechanisms to address pollution, biodiversity, and climate change, b) Capacity-building for the application of regional frameworks supporting policy coherence and a sustainable blue economy, c) Facilitating regional knowledge exchange and outreach."

(iii) At PIF stage this project was presented as tied to the WB rail project loan. This is no longer the case. Please include the write up from the co-financing letter in the field below the co-financing table: "... the following technical assistance: (i) assistance to enhance environmental knowledge in Caspian Sea fisheries and aquaculture through value chain assessments and exploring Nature-Based Solutions, (ii) assistance to promote sustainable forest management in Azerbaijan by enhancing local livelihoods through Payment for Environmental Services, Non-Timber Forest Products, and eco-tourism, while supporting biodiversity conservation, economic growth, and maintaining good environmental status in the Caspian Sea, (iii) support to enhance the resilience of Azerbaijan's coastal ecosystems by leveraging ecosystem valuation, strengthening capacity building, and supporting national policies on coastal areas, (iv) support to improving the resilience of port infrastructure, shipping and logistics to climate-related risks and disasters in the Caspian Sea, and (v) support to Azerbaijan, Kazakhstan, and Turkmenistan to greening of build infrastructure such as ports, cities, industries, to have lower negative environmental footprint, making information via Bank's Living Planet Observatory WebApp with datasets, library and science resources in view of advancing a sustainable blue economy in the Caspian Sea."

12th of November 2025 (thenshaw):

(i) English translation is included in Portal. However, the described co-financing from Turkmenistan appears to be investment mobilized, not recurrent expenditures. Please revise classification.

(ii) Addressed

(iii) Addressed

14th of November 2025 (thenshaw): Addressed

Agency Response

Co-financing numbers have been updated. TM letter to be translated.

WB Loan and project area: the rail project included indicatively as co-finance at PIF stage is not located in the project area that is now refined and presented in the final design of the project. No new WB project loan was promised at PIF stage.

November 6:

(i) As per the comments, the text below the co-financing table was updated and complemented with further details for each country. Translation of the TM letter is uploaded to the GEF portal.

(ii) The proposed explanation was included for the TCIS below the co-financing table.

(iii) The text was added from the co-financing letter in the field below the co-financing letter as suggested.

November 14:

(i) Thanks. This is corrected in the text directly by changing 'investments' to 'recurrent expenditures'. In the co-financing table, it was 'recurrent expenditures'.

November 14:

Thanks for additional guidance, the table has been updated to 'public investment' for Turkmenistan.

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 were 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 Request Yes

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

28th of October 2025 (thenshaw): The letters no longer appear in the Portal (See screenshot below). Please complete this field.

Record of Endorsement of GEF Operational Focal Point(s) on Behalf of the Government(s) :
Please attach the Operational Focal Point endorsement letter(s) with this template.

Name of GEF OFP	Position	Ministry	Date (Month, day, year)
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12th of November 2025 (thenshaw): Addressed

Agency Response **November 6:** Thanks, added letters from Azerbaijan, Kazakhstan, and Turkmenistan

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 Yes

Agency Response

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

8th of September 2025 (thenshaw): To be reviewed once comments on project architecture and project description are addressed/project results framework is revised accordingly.

28th of October 2025 (thenshaw):

(a) Please ensure all GEF Core Indicator targets are reflected (and expressly named) in the Results Framework.

The end targets for the PDO do not align with the GEF Core Indicators. Please explain in the document and here in review sheet.

The beneficiaries presented in the Results Framework must match the target in the Core Indicators. The presented beneficiaries seem to only add up to a few thousand. Please note that current target of 950,000 for the Core Indicator is far too high. The PIF approved target was 200,000.

(b) Partly. No means of verification is presented for the WB components. Please revise table accordingly.

(c) Please include the "GAP" indicators in the Results Framework

(d) Yes

12th of November 2025 (thenshaw): Addressed

Agency Response

November 6:

(a) Thanks. All GEF Core Indicators are now included as part of the RF and the RF was updated in line with the comments received. The presented beneficiaries now add up to the total of 204,370 beneficiaries under CI11. Presentation of the Results Framework by Component follows respective requirements of each agency but includes now all GEF Core Indicators and the teams tried to synchronize as much as feasible.

(b) Bank added ?Means of Verification? in the notes section for each indicator

(c) Thanks, added.

Annex E: Project map and coordinates

8.7 Have geographic coordinates of project locations been entered in the dedicated table? (Note: the provision of maps is at the discretion of agencies considering sensitivities in the given context)

Secretariat comment at CEO Endorsement Request **8th of September 2025** (thenshaw):
Yes

Agency Response

Annex F: Environmental and Social Safeguards Documentation and Rating

8.8 Have the relevant safeguard documents been uploaded to the GEF Portal? Has the safeguards rating been provided and filled out in the ER field below the risk table?

Secretariat comment at CEO Endorsement Request **8th of September 2025** (thenshaw):
Yes

Agency Response

Annex G: GEF Budget template

8.9 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

8th of September 2025 (thenshaw):

***The project budget needs to be included as a consolidated version of the UNEP and WB budgets (in GEF template format). GEFSec will then carry out a full review of the budget.

(i) Please do not present budget by sub-component. Budget should be presented at Outcome level. Grant totals must add up to Component totals. See Template here: <https://www.thegef.org/documents/gef-project-budget-template>

(ii) Please ensure TORs for staff are presented as one file and avoid duplicating roles. Please clearly explain each staff roles and responsibilities so the reviewer can understand how the key staff mapped to both WB and UNEP fit together to execute the project.

*The WB TORs for key staff does not appear to be uploaded to the Portal.

(iii) Similar to other comments above, the ?Responsible Parties? column should refer to UNEP, not to TCIS, since UNEP will be the executing entity. Please revise.

(iv) The total cost of personnel for this project is \$5,899,326, representing 50% of the total budget, which is extremely high. In this contexts, please check all budget categories and ensure they are consistent with the GEF Budget template. For example, ?Audiovisual and printing? (\$630,000) is not an eligible category. Similarly, ?Consultancy Services? is not a recognized GEF budget category ? it may be ?Consultant Services? Individual?. The Agency must include the type of consultant + all budget item descriptions adequately and briefly capture the activity they refer to ? for example, ?Priority setting,? ?National consultants,? and ?International consultants? ? these need to be more descriptive upon resubmission. For instance, the consultancy ?Development of Pollution Monitoring Scheme? (\$1,050,000) requires further explanation, as well as it is the case for the others (hint: please present the budget per component instead of per sub-component, so the column ?Detailed Description? will be wider) .

(v) For project personnel who will perform both PIU roles (ie, charged to PMC) and technical component roles, please include TORs for each role in the project document for review by GEF. On this, there is one Project Technical Lead (\$456,000) and one

Regional Technical Coordinator (\$515,000), two positions that account for nearly 8.2% of the total budget. It is typically not advised to add multiple layers of management inside the PMU from a value-for-money perspective. Therefore, please merge these positions in one for this position to carry out managerial and technical responsibilities, also indicating where the unused funds will be allocated. Similar comment applies to the two positions Project and Regional Project Assistants.

(vi) Travel (\$560,000) requires detailed description. Also, Global shared services is an ineligible activity ? please remove this expenditure and indicate where the unused funds will be allocated.

(vii) Please check the budget section for correct formatting ? there are sections of type in blue color, other sections have a shaded green background.

Per the resubmission, we will review the budget and provide comments as appropriate.

28th of October 2025 (thenshaw):

2.1. Strengthened institutional capacity for biodiversity planning in marine areas total in budget is \$1,000,000 and is \$1,250,000 in project overview table. Please correct.

2.2 Strengthened biodiversity planning and conservation measures, including for flagship species indicative of the Caspian Sea health in budget table is \$3,000,000 in budget and is \$3,250,000 in budget table. Please correct.

(ii) Please present all TORs for all PMC positions in one file. Please clearly explain each project position (roles and responsibilities) under the institutional arrangements section

Please present TORs to explain why Project Technical Lead (UNOPS) and Regional Technical Coordinator (TCIS/UNEP) are mapped to M&E in part.

(iii) Addressed

Please respond to comment (iv)

Please respond to comment (v).

Travel needs to be disaggregated in the budget table. Please revise.

(vii) Not addressed. Please check the budget section for correct formatting ? there are sections of type in blue color, other sections have a shaded green background.

12th of November 2025 (thenshaw):

(i) Addressed

(ii) "National consultants", "International Consultant", "Publication services", "KM contracts", "Regional Meetings" "Data Sharing and Innovation" and "Regional Assessments, Frameworks and Trainings" need to be better specified. As noted in comment above, the budget table must include the type of consultant + ensure all budget item descriptions adequately and briefly capture the activity they refer to.

(vii) Addressed, but please ensure the position names in the budget table and the TORs match exactly. There is some incongruence.

14th of November 2025 (thenshaw): Consultants' and staff expenses account for 48% (\$5,669,522) of the project budget, which is extremely high. Please reduce this amount and clearly indicate where the funds have been reallocated. When reducing the cost of personnel, for

the remaining ones please disaggregate between International and Local Consultant : kindly provide a comprehensive breakdown of each consultancy, specifying the details such as the nature of services, cost, duration (days/months) per consultant, and avoiding aggregation by component - otherwise, one cannot understand what an international vs. a national consultant will deliver. Therefore, please indicate the above requested information for each type of consultant (national, international, individual, etc.)

Additionally, we observed many positions with overlapping general description. Consultancies for monitoring when there are specific items for M&E experts. Please remove the redundant items and detail where these funds have been allocated.

Based on the TOR provided the tasks listed for the ?Senior Project Manager?, ?Project Support Officer? and ?Regional Technical Coordinator? are all managerial-heavy positions. Most non-UN Agencies only have one person in the Managerial/Technical position as the person responsible for the project. Please merge these three positions into one, which cannot cost more than \$450 K, and specify where the funds have been reallocated.

20th of November 2025:

(1) Switching consultants to contractual services is not acceptable. In the image below, circled in red, we observe the initial comment regarding consultancies lacking specificity?details such as the nature of services, cost, duration (days/months), and avoiding aggregation by component were missing. On the other image, circled in blue, we see these same consultancies shifted to contractual services. These changes are cosmetic: they simply reallocated the costs of personnel from one label (staff / consultants) to another (contractual services), and the percentage of it is 34% of the GEF grant. Please present the cost of personnel in a clear manner, and request to lower the cost by merging redundant positions / consultants.

International and Local Consultants	Consultant services (local and international) for development of pollution monitoring schemes in three focus countries (gap review of and recommendations on pollution monitoring practices, development of the pollution monitoring scheme and institutional arrangements, its validation with stakeholders, drafting policy instruments to facilitate adoption and implementation)		\$1,000,000						\$1,000,000	\$1,000,000	UNOPS
	Consultant services (local and international) to develop pollution monitoring and best practices guidebook	\$150,000							\$150,000	\$150,000	UNOPS
	Consultant services (local and international) to adopt policies/laws required to expand MPAs in focus	-			\$600,000				\$600,000	\$600,000	UNOPS
	Contractual arrangements for development of pollution monitoring schemes in three focus countries (gap review of and recommendations on pollution monitoring practices, development of the pollution monitoring scheme and institutional arrangements, its validation with stakeholders, drafting policy instruments to facilitate adoption and implementation)		\$1,000,000						\$1,000,000	\$1,000,000	UNOPS
	Contractual arrangements to deliver technical assistance for adoption of policies/laws required to expand MPAs in focus countries (gaps analysis, recommendations, draft of policies/laws, consultations processes)	-			\$600,000				\$600,000	\$600,000	UNOPS

(2) We appreciate the agency's effort for redistributing the positions. After reading the explanation, we understand that keeping two managerial positions (National Project Coordinator and Regional Technical Coordinator) responds to have two Implementing Agencies with the respective executing partners. However, the Technical Lead role is part of the Managerial positions. A technical role should focus on delivering technical outputs, while a role that coordinates technical teams has a managerial nature, and these two different but complementary types of tasks can be carried out by the same person. Please remove the Technical Lead position and clearly indicate where the funds have been reallocated (it can't be to another position). The technical aspects of coordinating teams should be handled by the National Project Coordinator and Regional Technical Coordinator without increasing the funds allocated to these positions.

Technical Lead/Coordinator provide technical support and coordinate all activities related to the project - 48 months over project lifetime	\$115,000	\$115,000	\$115,000	\$115,000		-	\$115,000		\$115,000	UNOPS	
Salary and benefits / Staff costs	National Project Coordinator (UNOPS) - 24 months over project lifetime							-	\$311,000	\$311,000	UNOPS
	Regional Technical Coordinator (TCIS/UNEP) - 48 months over project lifetime				\$300,000	\$15,000	\$315,000	\$100,000	\$415,000	UNEP (TCIS)	

Per the resubmission, we will review the budget and provide comments as appropriate

10th of December 2025 (thenshaw): Addressed

Agency Response

The budget was consolidated (initial file as well). Sub-components changed to Outcomes.

No key staff mapped to WB executing any project activities. Self-execution is only relevant to UNEP.

There are no WB TORs for key staff as no Bank staff involved in execution and is not an executing agency.

UNEP: Addressed. The column "Responsible entity?" has been updated.

Clarification of the "Travel" budget (renamed to "Travel & Subsistence (incl. DSA & Participant Support)?)

This line covers eligible, direct project costs for staff and participant travel to regional governance meetings, national consultations, technical missions, and COP-related sessions, including airfare (economy), DSA/per diem (per UN rates), visas/terminal transfers, and local transport strictly linked to project activities. Furthermore, the total travel budget has been slightly reduced.

November 6:

The estimated budget was corrected in line with the overview table.

(ii) Narrative on roles and responsibilities for PIU positions added under the institutional arrangements section. A separate file is now uploaded with TORs covered by the PMC costs. The TOR of the Regional Technical Coordinator (TCIS/UNEP) and Project Support Officer (UNOPS) detail the M&E related tasks/duties, which include e.g. monitoring and guiding implementation of key project plans (knowledge management, stakeholder engagement, and safeguards), supporting the preparation of mandatory reports, and contributing to the development of the project exit strategy (UNEP) and supporting the proper implementation of M&E framework, coordinating with implementing partners the application of M&E tools, such as reporting templates and evaluation surveys, to ensure adequate data collection and quality assurance (UNOPS). Each position allocates US\$15,000 to M&E.

(iv) All regional project personnel will deliver technical work. These include: drafting regional assessments and frameworks, develop training material and knowledge management products. Visual and printing line was removed, ?consultancy services? mean ?consultant services ? international and/or local consultants, updated in the budget. Details of the activities are presented in the project description for a specific task. The budget now provides indicative estimates with as much details as possible at this stage with further details to fall under Procurement Plans and Annual Workplans.

(v) The annex with TOR illustrates the role of the key positions, including those playing a dual role (PMC and Technical).

(vi) Travel for Component 3 has been disaggregated into (1) travel of consultants and Regional Coordination Unit personnel and (2) travel support provided to participants or members of working groups and sectoral roundtables and industry groups

(vii) Shaded colors were removed (no specific guidance was noticed that they can't be colored), the categories now follow the GEF Budget template.

November 14:

(ii) Additional specifications have been added in the detailed description column in the budget table. The budget table was re-uploaded.

(vii) Thanks, addressed. The position names in the budget table are now aligned with the TORs document. TORs document was re-uploaded.

November 18:

Re reducing the consultant and staff expenses. The provision of specialized advisory support on pollution, biodiversity, climate-related issues under component 3; leading the drafting of the regional frameworks and assessments and training under outputs 3.1.1-3.1.3; as well as ensuring provision of national-level technical inputs in these; have been reallocated to contractual services from consultancies. Other consultancies under Components 1 and 2 for various outputs on pollution monitoring and biodiversity planning have also been shifted to contractual services. This shift will allow the project to ensure the provision of these functions through regional and national entities instead of through the hiring of individual consultant personnel. The budget for the Regional Technical Coordinator was also reduced by 100k USD (moved to Contracts with national agencies, research institutions, and regional initiatives). The total budget allocated to consultants and staff expenses now adds up to 1,192,875 USD (10%).

Re disaggregation between local and international consultants and comprehensive breakdown. The project budget was restructured to separate international and local consultants. Each remaining consultancy line now contains further additional information on the nature of services (incl what outputs/activities it contributes to) and duration under the ?detailed description column?. The cost is shown in the total cost of the budget line.

Re overlapping monitoring functions. The overlapping items were deleted and merged into ?Project implementation progress reporting and evaluation and Mid Term review and Terminal evaluation (UNOPS & UNEP IA)? to avoid overlap. Some M&E budget was kept for the Regional Technical Coordinator, their M&E role is explained in detail in the ToRs.

Re the managerial-heavy positions. The allocation to ?Regional Technical Coordinator? was reduced by USD 100,000, and these funds were reallocated to strengthen contracts with national agencies, research institutions, and regional initiatives under Component 3. The ?Senior Project Manager?s role has been reduced to a purely technical role as ?Technical Lead? (PMC allocation was removed). This reduces the budget total of managerial roles by 315,000 USD. The total PMC allocation for the two remaining managerial positions is now USD 411,000 (below the requested USD 450,000). The overall PMC percentage is within the permitted 5% (at 4.84%) and mainly allocated to these two positions, and their respective project management functions, which are detailed in the TORs for these positions. Furthermore, the Regional Technical

Coordinator also significantly contributes to the technical delivery of the project under Component 3. The technical functions are also detailed in the TORs.

The remaining two positions with managerial functions (National Project Coordinator and Regional Project Coordinator) cannot be merged into one due to accountability requirements between the IAs and the EAs. Each IA is responsible for the oversight and supervision of its respective EA, and combining these roles would compromise clear lines of responsibility and would not be aligned with agency policies.

November 21:

? **Responses to comment (a).** Thank you. We recognize the importance for project personnel to deliver clearly defined and targeted work, without overlapping functions. It's understood that the cost of the personnel should be clearly presented. The budget has been designed to enable the project's Executing Agencies to deliver on the commitments outlined in the proposed project intervention.

To deliver on this project's proposed intervention, and its pledged outputs (see project description section and project results framework), the budget requires allocation to individuals or institutions/entities with relevant regional and national/local technical expertise and knowledge, to ensure input from several actors and thematic perspectives to then be consolidated into final deliverables: pollution monitoring schemes in three focus countries (1.2.1-1.2.4), establishment of Marine Protected Areas in targeted sites (2.2.2, 2.2.3), regional assessments (3.1.1), frameworks (3.1.2), trainings (3.1.3), prefeasibility studies (1.1.3, 2.1.6), etc. Reallocating the funds from technical experts and/or regional, national or local institutions/entities to other budget categories outside of staffing (e.g., procurement of goods, workshops/trainings, monitoring and evaluation, travel, or other operating costs) would result in a reduced capacity for the project to deliver on the promised outputs.

In response to request to reduce allocations to consultants and staff, the Implementing Agencies have revised their approach and shifted part of this allocated budget from consultants to regional and national entities to deliver the same scope of work, while additional details on nature of services, allocated months and costs for the remaining consultants had been provided as requested. While budget has been presented by component as per the GEF budget template, the linkage to outputs and activities is presented in the detailed description. Additional information on the nature of services has now also been provided for the contractual services category and the remaining local consultant.

? **Responses to comment (b).** Thank you. As mentioned earlier, the Technical Lead role has been reduced to a purely technical role and is not part of the Managerial positions. The International Consultant will provide technical advisory support and expertise for specific activities, notably in pollution monitoring and biodiversity planning. We can't remove the position as it is essential for delivering on the project's outputs. The Agency has clarified further that the role is identified as "Technical Advisor" in the budget table and has outlined specific outputs that this position will contribute to.

November 26:

Response to comment (a). Thank you for your comments on the revised budget. We agree on the importance of clarity in roles and responsibilities and have sought to maximize efficiencies, taking advantage of the executing agencies' comparative advantage. Following your guidance, we have made a new iteration of the budget that allocates more funds to national and regional entities and clarifies the purpose of each contractual service.

We recognize that in order to deliver on this project's proposed intervention, and its pledged outputs and global environmental benefits (hectares of new marine protected areas, ha of terrestrial protected areas under improved management, and improved cooperative management of the Caspian Sea), the project requires adequate allocation of technical work for individuals or

institutions/entities to incorporate all regional and national technical knowledge and perspectives. Especially in the International Waters Focal Area, the involvement of regional and national entities is key to collate perspectives and deliver on the improved cooperative management of the Casian Sea. Reallocating the funds from technical experts and/or regional and national institutions/entities to other budget categories (e.g., procurement of goods, workshops/training, monitoring and evaluation, travel, or other operating costs) would result in a reduced capacity for the project to deliver on these promised outputs.

Therefore, in response to the request from the last review sheet to reduce allocations to consultants and staff, the Implementing Agencies had revised their approach and shifted part of this allocated budget to deliver the same scope of work from consultants to regional and national entities in the last resubmission. An initial identification of regional and national entities was carried out during PPG (e.g., national academies of science, Caspian Sea Institute of Turkmenistan, Kazakh Scientific and Research Institute of the Caspian Sea (Aktau), etc.). Additional details on nature of services and allocated months and costs for the remaining consultants have now been provided as requested. Please note that while budget has been presented by component as per the GEF budget template, the link to outputs and activities is presented in the detailed project description.

To address concerns about the lack of specificity in the consultancies, the Agencies have now included additional details in the budget regarding the nature of services provided within the contractual services categories (as the services provided by some of the original consultants had been shifted to being provided by regional and national entities). The budget lines are now clearly separated by specific activities for each focus country, and each line now includes a more detailed description. For example, the development of pollution monitoring schemes has been broken down for Azerbaijan, Kazakhstan, and Turkmenistan, respectively. This same method has been applied to the other activities, including establishment of new Marine Protected Areas (MPAs), the development of policies and laws required for MPAs in each respective country. In other words, the revised budget has a more detailed breakdown and has direct reference to the technical activities that funds are used for.

To provide clarity on the required deliverables under contracting services and to highlight their necessity in the budget table, the Agencies have reflected the required technical work and expertise to deliver pollution monitoring schemes in three focus countries (1.2.1-1.2.4), Marine Protected Areas in targeted sites (2.2.2, 2.2.3), four regional assessments (3.1.1), five regional frameworks (3.1.2), targeted training on the implementation of these frameworks (3.1.3), knowledge management (3.1.4), prefeasibility studies (1.1.3, 2.1.6), etc. in the detailed description column.

Additionally, for the capacity building activities, a budget of US\$200k was allocated originally across three countries (not just for AZ). However, when breaking down the budget by activities in each country, it wasn't disaggregated as it should have been. It was corrected and funds were reallocated across all countries accordingly, in line with the original plan, US\$70k per each country (US\$10k was removed from the awareness raising/ outreach package).

Response to comment (b). Thank you for this feedback. In alignment with the additional discussions held with the GEF Secretariat and the agreement reached, the Technical Lead position has been merged with the National Project Coordinator role (and renamed to National Technical Project Coordinator). The technical advisory responsibilities previously assigned to this role will now be taken on by the National Technical Project Coordinator. Additional funding (under components) has been added to this merged line to reflect these additional responsibilities while the same PMC budget allocation originally designated for that position was kept. This will ensure that the technical support is efficiently provided within the current structure, without increasing PMC costs. The number of working months for the National Technical Coordinator has now also been increased to 48 months over the project lifetime to reflect the additional responsibilities. The ToRs have been updated accordingly. The remaining funding from the technical lead (under

components) was moved to support the prefeasibility studies for financing instruments under pollution monitoring and biodiversity planning (under contractual services).

Annex H: NGI Relevant Annexes

8.10 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 Request N/A

Agency Response

ANNEX I: Responses to Project Reviews

8.11 a) Have responses to Council comments, if any, at PIF/PCN stage been provided?

b) Have responses to STAP screen, if any, been provided?

c) Have responses to other comments, if any, been provided?

Secretariat comment at CEO Endorsement Request

8th of September 2025 (thenshaw):

Overall, the STAP and Council comments are not sufficiently responded to in the matrix. Please revisit each comment to ensure they are incorporated into the CEO document.

(a) Please provide a response to "Overall, it is a well-intentioned project that aims to address select environmental problems plaguing the shared water body (biodiversity loss and pollution). However, the project remains relatively unambitious, especially in light of the three decade history of GEF and non-GEF support for the Caspian Sea basin. Nor does the project appear to take into account recent legal, institutional, environmental, economic and political developments in the region." This comment is reflected in review sheet above at CEO endorsement.

"Overall, the Theory of Change needs to be improved. As currently written, the project components do not explain how they will adequately address the issues/barriers (and why the ones to be addressed have been chosen, as opposed to others) ? nor how they relate to the root causes. " It is not clear how the TOC has been reworked.

"As currently written, it feels like two separate projects ? one that targets pollution and that focuses on biodiversity ? thus missing an opportunity for integrated management." The project document now presents the project as three projects.

(b) Regarding "While STAP is rating this project as a minor, mainly because the proposed activities seem feasible and can deliver some GEBs in the identified areas (pollution, biodiversity) and the design of the project supports those, the proponent needs to significantly revise the proposal in line with the comments below to ensure it delivers a good return on GEF investments especially with regards to proper integrated water (fresh and marine) management and a source to sea (S2S) approach (especially as the project has a strong IW component) and thus generates GEBs in an innovative and transformative manner." The project is no longer targeting terrestrial GEBs, which makes the Agency response on S2S insufficient. Please explain how S2S is incorporated into this project.

(c) Responses to Council comments are not sufficient. Please provide detailed responses to each query. Many of these comments are still valid and have not been addressed at CEO endorsement.

28th of October 2025 (thenshaw):

(a) + (b) A "two project" approach was not discussed and agreed with the GEF Sec in the September 23, 2025 meeting. The project is being co-implemented by the World Bank and UNEP. Please clarify the Agency response.

For STAP comment on table line 2: Rather than "The task team thanks the STAP for their view.", please explain how the project is taking into account recent legal, institutional, environmental, economic and political developments in the region.

For the response "The task team believes it has integrated to the extent possible the required elements related to water and S2S." Please explain in the matrix how.

Please do not refer to this project as two projects: "Project focus. The national activities (via the World Bank project) focus on very specific pollution and biodiversity issues. This is required to achieve specific outcomes with pollution reduction and biodiversity outcomes. project is aligned with Paris Agreement. The regional activities (via the UNEP project) addresses dialogue on climate including sea level decline and supports an approach of integration of all threats as part of the marine spatial planning approach that is promoted."

Rather than "The contextual section has been revised and following the World Bank's new Project Appraisal Document (PAD) format." in response to "Importantly, the PIF refers to the negative impacts of environmental degradation on the project countries of Azerbaijan, Kazakhstan and Turkmenistan without acknowledging the other littoral countries that face similar issues. Despite political and other factors that may prevent direct engagement with these other countries, providing this type of contextual information ? particularly in a transboundary water basin ? is necessary to strengthen the overall rationale and justify the approach taken.", please refer to the new text on Role of non-beneficiary countries' engagement and integration.

Please refer to this project as one project: "The spatial planning included as part of the UNEP project is expected to engage the countries on how to best undertake marine spatial planning in all segments of the Caspian Sea, including within the 15 nm territorial sea and the Exclusive Economic Zone, while recognizing that not all maritime boundaries have been agreed among the countries." "The WB project will not support marine spatial planning." "The WB project will support Kazakhstan with developing new financing instruments for Caspian Sea conservation.": "Transboundary elements is now represented in more details in the UNEP project, while the national concrete outcomes on pollution monitoring and hectares of marine protected areas is the focus of the Bank project."

(c) Please address migratory birds comment from Canada. Will the project address migratory birds in MPA development?

Please respond to Germany's comments in detail, rather than referring Germany to sections of the document.

12th of November 2025 (thenshaw): Addressed

Agency Response
Further updated.

The 'two-project' approach was discussed and agreed with the GEF Sec in the September 23, 2025, meeting.

Absheron (AZ) and Garabogaz (TM) are terrestrial to marine areas. Itbalygy (KZ) is protecting islands and marine areas seals need for survival, and in synergy with UNDP (as requested by STAP) is addressing watershed challenges.

UNEP/TCIS support to relevant Moscow Protocol responds to how S2S is incorporated into this project.

November 6:

Re explaining in the STAP comments matrix how the project has addressed the S2S approach. Further explanation was added in and the table with updated responses was added.

All references that referred to WB and UNEP projects have been removed.

Response to Canada and Germany have been expanded.

Additional Annexes

9. GEFSEC DECISION

9.1.GEFSEC Recommendation

Is the project recommended for approval /endorsement

Secretariat comment at CEO Endorsement Request

8th of September 2025 (thenshaw): No, please address comments and resubmit. Thank you.

28th of October 2025 (thenshaw): No, please address comments and resubmit. Thank you.

12th of November 2025 (thenshaw): No, please address comments and resubmit. Thank you.

14th of November 2025 (thenshaw): No, please address comments and resubmit. Thank you. Please include a publicly marked version of the WB PID in the Documents Tab.

20th of November 2025 (thenshaw): No, please address comments and resubmit. Thank you.

10th of December 2025 (thenshaw): Yes

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

Secretariat comment at CEO Endorsement Request

Please secure additional sources of co-financing during the project inception phase and report in first PIR

Please share and discuss the Project Manual with the GEF Sec reviewer, once developed

9.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	9/8/2025	
Additional Review (as necessary)	10/28/2025	
Additional Review (as necessary)	11/12/2025	
Additional Review (as necessary)	11/14/2025	
Additional Review (as necessary)	11/20/2025	