



Blueing the Caspian Sea

Review PIF and Make a recommendation

Basic project information

GEF ID

11429

Countries

Regional (Azerbaijan, Kazakhstan, Turkmenistan)

Project Name

Blueing the Caspian Sea

Agencies

World Bank

Date received by PM

10/18/2023

Review completed by PM

3/21/2024

Program Manager

Taylor Henshaw

Focal Area

Multi Focal Area

Project Type

FSP

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Project Information / Eligibility

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

****World Bank PIF and PCN read in conjunction for this review**.**

23rd of October 2023 (thenshaw):

(a) Yes, but please better articulate the need for a transboundary approach in the portal submission (which is somewhat captured in the PCN annex). The transboundary element in the project summary/outputs also needs to be better conveyed.

(b) Partly. The Executing Agency is listed as UNEP. GEF Sec understands that the Tehran Convention Secretariat, which is hosted by UNEP's Europe Office, will be the effective executing entity. Please explain why UNEP, instead of the Tehran Convention Secretariat, is listed as the Executing Agency.

27th of November 2023 (thenshaw):

(a) Addressed.

(b) Addressed.

The PCN notes GEF financing is \$12M not \$13M. Please clarify how this is calculated for the PCN.

30th of November 2023 (thenshaw): Addressed.

Agency's Comments

Thank you.

a) Explanation added to the Project Summary, Approach to deliver objectives. Indicative Project Overview, Project Outputs column revised to note transboundary outputs under Component 1 (regional component).

b) UNEP is listed as the Executing Agency since it is a legal entity with whom the World Bank can sign a financing agreement. As noted, UNEP hosts the Tehran Convention, which will act as the Project Implementing Unit of the Project.

11/28/2023.

The PCN is referencing the project financing excluding any agency fees, thus the difference in the number.

2. Project Summary

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

Secretariat's Comments

23rd of October 2023 (thenshaw): Partly, please address the following:

(1) The problem and issue to be addressed are not sufficiently captured in the Project Summary in the GEF Portal. The justification for an IW investment is also missing in the Project Summary. Why does pollution reduction and biodiversity conservation require a transboundary approach in the Caspian Sea?

(2) Please include the project Theory of Change diagram (which reflects comments below) in the Project Summary section of the portal submission.

(3) Please also include in the Project Summary the write up in the PCN on the three components (paras 21-23) (and which reflects comments below).

(4) Please include the GEF Core Indicator targets (GEBs), including direct beneficiaries and who they are, in the Project Summary.

*Given the sparse text in the submission, exceeding the word count for the summary is permitted.

27th of November 2023 (thenshaw):

(1) Addressed.

(2) Addressed.

(3) Addressed. Please also include the M&E component in the summary.

(4) Addressed.

Should the text say " The following outputs are expected rather than "The following results are expected"

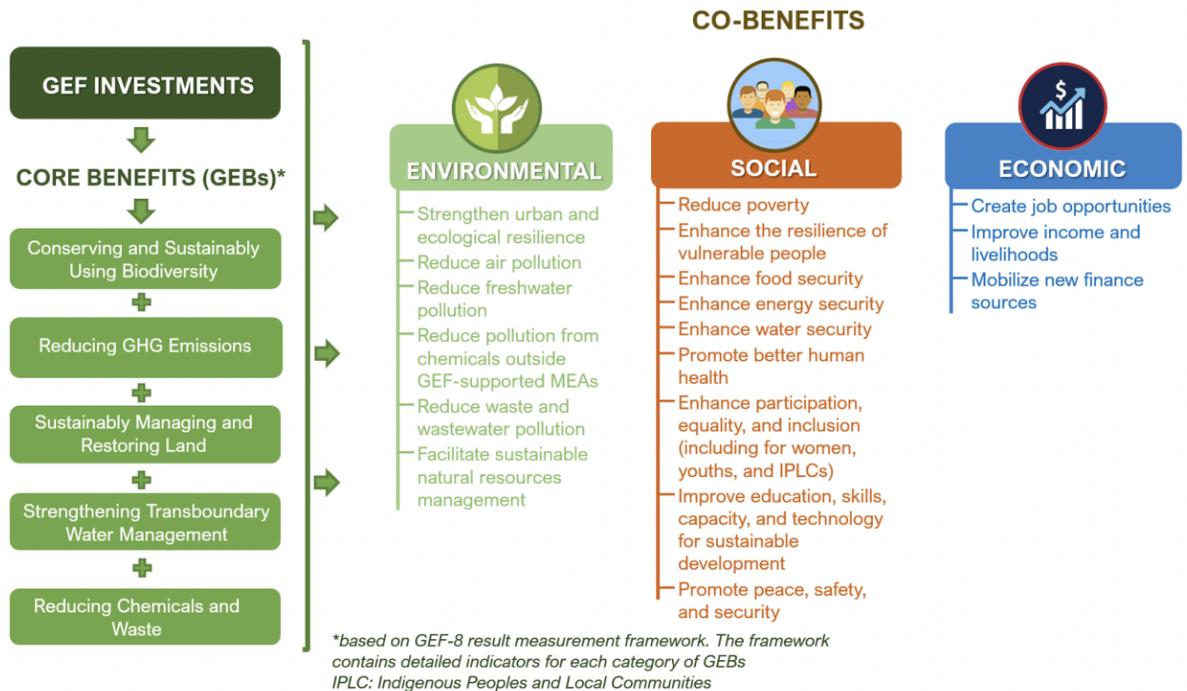
30th of November 2023 (thenshaw):

(3)Addressed

(4) Addressed.

26th of February 2024 (thenshaw):

Please refer to the STAP guidance on co-benefits in projects. Please describe socioeconomic co-benefits for the 200,000 people targeted through this intervention as direct beneficiaries.



21st of March 2024 (thenshaw): Addressed.

Agency's Comments

Thank you.

(1) Problem and issues to be addressed were expanded in the Project Summary. Justification for an IWN investment added in the Project Summary

(2) Project Theory of Change (adjusted) added to the Project Summary and updated in PCN

(3) Project component description (adjusted) added to the Project Summary and updated in PCN - M&E component added in the project summary

(4) Core indicators and their targets are now included in the Project Summary Section, along with explanation on direct beneficiaries - Text edited to reflect requested change

March 20, 2024: Thank you.

Additional information co-benefits included in the project document

3 Indicative Project Overview

3.1 a) Is the project objective presented as a concise statement and clear?

b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

Secretariat's Comments

23rd of October 2023 (thenshaw):

(a) Yes, however, the PCN refers to three PDO-level indicators while the portal submission and the balance of the PCN refer to only two of these three PDO-level indicators as project objectives. Please clarify.

(b) No.

(i) The Indicative Project Overview Table in the GEF Portal is missing all outputs. Please populate accordingly. Please add more specificity to the outputs i.e., "PA staff trained"; "Public awareness programs implemented", as examples, are not specific and measurable.

(ii) Please explain why the Component Type for Components 1 and 2 is "Investment". The types of activities presented appear to be a mixture of Investment and TA. Please revise accordingly.

(iii) As mentioned elsewhere in the review, M&E needs its own funding envelope. The funding for M&E is left blank in the table and there are no outcomes/outputs associated with the component.

(iv) Please number Components, Outcomes and Outputs (i.e., Component 1, Outcome 1.1, Activity 1.1 etc...).

(v) The GEF Core Indicators should be included in the project logframe tables in the portal and PCN. Please revise accordingly.

(vi) It appears the project short term outcomes (noted in the logframe) are not just capacities enhanced, but also new protected areas created, # of people directly benefited, and climate change resilience/adaptation (?). Please consider including these short term outcomes in the logframe and theory of change.

(vii) Page 4 of the PCN notes, "To address the impacts of climate change, more adaptation measures are needed, with adaptation measures also providing co-benefits for economic and social development. The project will also include adaptation measures for all three countries to address this". It is not clear that the project will include such adaptation measures. Please strengthen this aspect of the submission.

23rd of November 2023 (thenshaw):

(a) Addressed.

Can PA staff trained"; "Public awareness programs implemented", be made more specific and measurable?

(b)

(i) Addressed.

(ii) Addressed.

(iii) Addressed.

(iv) Partly addressed. Please number the Components.

(v) Partly. Please include these as indicators below outputs, not as outputs themselves. For example, 200,000 direct beneficiaries is not an output.

(vi) Addressed.

(vii) Addressed.

30th of November 2023 (thenshaw):

(a) Addressed.

(b) (iv) Addressed.

(v) Addressed.

Agency's Comments

Thank you.

a) PDO Indicators 1 and 2 will both contribute to the PDO of "*Strengthen the capacity of the participating countries to address pollution*". Indicators 1 & 2 measure the first part of the PDO, and Indicator 3 measures the second part of the PDO. **- additional information added in the PCN. the PCN specifies that details of the activities will be agreed upon with stakeholders during project preparation**

b)

(i) project outcomes and outputs have been revised and added to the portal submission.

(ii) tagging of project components have been updated; Component 1 is investment, component 2 is left as TA, component 3 was split to accommodate both TA and Inv.

(iii) M&E component added

(iv) Components, Outcomes and Outputs are now numbered - Components numbered. **The Component 3 is split into 2 to separate investment from technical assistance activities**

(v) CRIs now incorporated into Logframe outputs table - **Indicators moved below outputs as requested in the GEF datasheet**

(vi) Since the PDO is centered around capacities, so are the outcomes. The team considers the number of new protected areas created an output and not an outcome, the number of people directly benefiting as an indicator, and not an outcome, and climate change resilience/adaptation a long-term outcome of the project. Additional information has been included in the logframe and components table

(vii) A paragraph on project support to adaptation added to Project Summary. This is discussed in the PCN under the Paris Alignment paragraph.

March 20, 2024: Thank you.

additional outputs now included where relevant

3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?

Secretariat's Comments

23rd of October 2023 (thenshaw): Partly, please address the following:

(1) Gender dimensions: Gender is not adequately articulated in the project description. Please reflect gender perspectives in the section on Project Description/Project Components, in line with good gender mainstreaming practice.

(2) Knowledge management: While confirmed that an approach to KM and Learning has been clearly described in the Project Description, the KM approach is not adequately reflected in the text itself. Please revise accordingly.

(3) M&E: Please include M&E as a separate project component with its own funding envelope and activities.

27th of November 2023 (thenshaw):

(1) Partly addressed. Gender aspects must be reflected in the component descriptions. Please add additional text to the outputs on gender. The only output is a Report on gender participation. What types of activities will empower women/address gender dimensions? This must be better reflected for clearance.

(2) Addressed.

(3) Addressed.

30th of November 2023 (thenshaw):

(1) Addressed

26th of February 2024 (thenshaw): Please see new gender dimensions comment below.

21st of March 2024 (thenshaw): Addressed.

Agency's Comments

Thank you.

(1) Gender dimensions added where relevant to the new project description text under Project Summary. PCN covers gender under the Gender paragraph.

(2) Text added to the three components in the GEF datasheet and PCN.

(3) M&E component added

11/29/2023

Thank you. Gender aspects highlighted under the components in the PCN.

March 20, 2024: Thank you.

3.3 a) Are the components adequately funded?

b) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?

c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

23rd of October 2023 (thenshaw): No, please address the following:

(a) The description in the Project Context notes that the project "will be financed by a US\$12 million GEF grant, which will be divided equally between the three countries." This is not permitted for an IW regional project. All IW funds must be utilized for joint initiatives and cannot be divided equally among countries. Please revise accordingly.

As mentioned above, please include M&E as a separate project component with its own funding envelope and activities.

(b) Yes

(c) Yes

The Indicative Project Overview table in the PIF and the Annex I logframe in the PCN are not congruent in terms of budget. Please revise to ensure they match.

30th of November 2023 (thenshaw): Addressed.

Agency's Comments

Thank you.

(a) IW financing edited to indicate the utilization under joint activities; M&E component added in the project.

11/19/2023

Annex I Logframe in the PCN made congruent with the PIF

March 20, 2024: Thank you. Logframe adjusted to match portal PIF entry

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?

b) Are the key barriers and enablers identified?

Secretariat's Comments

23rd of October 2023 (thenshaw):

(a) Yes

(b) Partly. The PCN notes that the "The gaps identified for improved environmental management and blue economy in the Caspian Sea are related to policy, knowledge and financial barriers for pollution management and biodiversity conservation". And "the gaps have been identified as a) insufficient policy harmonization, strategic planning, and regional collaboration around biodiversity conservation and pollution management, b) countries? limited capacity for pollution monitoring, and c) insufficient investment in biodiversity conservation. These gaps represent substantial barriers to implementing the Convention and its protocols". The theory of change and incremental cost reasoning could be made stronger through a more detailed/specific description of what the gaps/barriers are. Please revise accordingly.

27th of November 2023 (thenshaw):

(b) Addressed.

Agency's Comments

Thank you.

(b) the project will further develop the gaps and barriers are part of the project preparation activities and will update the theory of change to incorporate additional findings in the PAD.

4.2 JUSTIFICATION FOR PROJECT

a) Is there an indication of why the project approach has been selected over other potential options?

b) Does it ensure resilience to future changes in the drivers?

c) 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?

d) are the relevant stakeholders and their roles adequately described?

Secretariat's Comments

23rd of October 2023 (thenshaw):

(a) Partly, as mentioned above, please explain why a transboundary approach is needed. This is somewhat captured in the PCN annex, but should be noted in the portal submission as well.

(b) No, the PCN and portal submission do not reference resilience to future changes in the drivers. Please include this information.

(c) Yes

(d) No, please provide a description of stakeholder roles and responsibilities in the project description.

27th of November 2023 (thenshaw)

(a) Addressed.

(b) Addressed.

(d) Please explain where this is addressed in both PIF and PCN. Stakeholder roles/responsibilities should be mapped to each output.

30th of November 2023 (thenshaw):

(d) Addressed.

Agency's Comments

Thank you.

(a) Transboundary reasoning added

(b) Added a paragraph linking the outcomes of the project to resilience (as per the theory of change, long-term outcomes) in the PCN Description and GEF datasheet Approach to deliver objectives.

(c) Thank you. N/A

(d) Added a paragraph on Stakeholders roles and responsibilities to the PCN Project Description and to the GEF datasheet Project Summary.

11/29/2023

the following paragraph was added to the project summary. Additionally, the narrative under each component shows the inclusion of stakeholders in training and workshop sessions. the project deliverables will also be developed through consultation with stakeholders and communicated via IW:Learn exchanges and public awareness programs. A stakeholder Engagement Plan will be developed as part of project preparation and will spell out roles and responsibilities of stakeholders clearly as they related to each project component.

Stakeholder roles and responsibilities: The project will be implemented by UNEP through its Tehran Convention Secretariat PCU as noted. The key stakeholders of the project, namely the relevant ministries of the three countries, will lead all project activities in their capacity as decision makers and technical professionals. Under Component 1, the governments will participate in workshops, training sessions, and exchanges, and take active role in the formulation and adoption of ICZM plans and MSPs. Under Component 2, they will contribute information to and endorse inventories, assessments, and plans, and participate in training and awareness programs. Under Component 3, the governments will contribute information to inventories and studies, lead the PA designation process, and participate in exchanges. The governments will also be represented in the Regional Steering Committee and provide technical specialists to the technical groups. Other stakeholders will be local coastal communities, who will benefit from fisheries value addition activities and actively participate in the development of ICZM plans and MSPs.

5 B. Project Description

5.1 THEORY OF CHANGE

a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?

b) Are the key outputs of each component defined (where possible)?

Secretariat's Comments

23rd of October 2023 (thenshaw):

(a) Partly. It appears that only two of the three PDO-level indicators are captured in the theory of change description and diagram. "Regional policies harmonized to address

environmental issues in the Caspian Sea" is missing in para 19 of the PCN and in the mid-term/PDO level of the theory of change diagram. Please revise accordingly.

In the diagram, please depict the linkages between the "Issues" and the "Activities".

(b) The key outputs are defined but not specific and measurable. Please revise accordingly.

27th of November 2023 (thenshaw):

(a) Addressed.

(b) Addressed. Outputs to be further defined and quantified in PPG.

Agency's Comments

Thank you.

(a) The theory of change does not present indicators, rather activities, outputs, and three levels of outcomes: short-term, medium term (the PDO with its two outcome statements), and long-term. The three PDO indicators measure these two PDO outcome statements as explained in section 3.1 above. Linkages between issues and activities added to the diagram.

(b) The outputs will be further defined and quantified during project preparation to be included in the Project Paper and they will be measured by Intermediate Result Indicators in the Project Paper's Result Framework.

5.2 INCREMENTAL/ADDITIONAL COST REASONING

Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?

Secretariat's Comments

23rd of October 2023 (thenshaw): Yes, the incremental cost reasoning is captured in Annex 3 of the PCN but it could be made stronger through a more specific articulation of the barriers and how the project will work to overcome those barriers. Please see comment above.

27th of November 2023 (thenshaw): Addressed.

Agency's Comments

Thank you.

The project will further develop the gaps and barriers are part of the project preparation activities and will update the theory of change to incorporate additional findings in the PAD.

5.3 IMPLEMENTATION FRAMEWORK

a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?

b) Comments to proposed agency execution support (if agency expects to request exception).

c) is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area

d) are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

Secretariat's Comments

23rd of October 2023 (thenshaw):

(a) Partly. As noted above, the Executing Agency is listed as UNEP. GEF Sec understands that the Tehran Convention Interim Secretariat, which is hosted by UNEP's Europe Office, will be the effective executing entity. Please explain why UNEP, instead of the Tehran Convention Secretariat, is listed as the Executing Agency.

(b) N/A

(c) No, this field is blank in the submission. Please populate accordingly.

(d) No, as mentioned above, while the box has been checked to confirm that an approach to KM and Learning has been clearly described in the Project Description, the KM approach/strategic communication approach is not adequately reflected in the text itself. Please revise accordingly.

27th of November 2023 (thenshaw):

(a) Addressed.

(c) Addressed.

(d) Addressed.

Agency's Comments

Thank you.

(a) UNEP is listed as the Executing Agency since it is a legal entity with whom the World Bank can sign a financing agreement. As noted, UNEP hosts the Tehran Convention, which will act as the Project Implementing Unit of the Project.

(c) Field populated in the portal submission

(d) Text added to the three components in the GEF datasheet and PCN.

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

b) Are the project's indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?

Secretariat's Comments

23rd of October 2023 (thenshaw): Partly, please address the following:

(1) The field below the Core Indicators table is empty. Please explain the methodological approach and underlying logic to justify target levels for Core and Sub Indicators.

(2) For Core Indicators 1, 2 and 5, please indicate the names, WDPA ID, IUCN category and areas of the existing terrestrial and marine protected areas that the project will work in to improve management effectiveness. These fields must be populated at project identification stage.

(3) For Core Indicator 7, please include level of involvement in [IW:LEARN](#) activities. Given the PDO outcomes, can this investment also target Indicator 7.3 - Level of National/Local reforms and active participation of Inter-Ministerial Committees?

(4) Please confirm that this project will not target Core Indicator 8 - Globally over-exploited fisheries moved to more sustainable levels (metric tons)

27th of November 2023 (thenshaw):

(1) Addressed.

(2) Not Addressed, the names, WDPA ID, and IUCN category and areas of the existing terrestrial and marine protected areas that the project will work in to improve management effectiveness have to be provided at PIF stage .

Further, the total for indicator 5 is empty. Please populate.

Core Indicators at Project Identification Form (PIF)

Indicator 5 Area of marine habitat under improved practices to benefit biodiversity (excluding protected areas) ⓘ

Ha (Expected at PIF)	Ha (Expected at CEO Endorsement)	Ha (Achieved at MTR)	Ha (Achieved at TE)

(3) Addressed.

(4) Addressed.

30th of November 2023 (thenshaw):

(2) Addressed.

26th of February 2024 (thenshaw):

(1) The portal text on GEF Core Indicators and project framework table reads:

GEF Core Indicator Targets:

? Terrestrial protected areas created or under improved management for conservation and sustainable use (Hectares)

Target: 50,000

? Marine protected areas created or under improved management for conservation and sustainable use (Hectares)

Target: 10,000

? Area of marine habitat under improved practices (excluding protected areas) (Hectares)

Target: 20,000

? Number of shared water ecosystems (fresh or marine) under new or improved cooperative management

Target: 1

? Number of direct beneficiaries disaggregated by gender as co-benefit of GEF investment

Target: 200,000 of which 100,000 female

Direct beneficiaries are coastal communities of the three countries benefiting from reduced pollution and improved biodiversity conservation actions.

Yet the Core Indicators table includes the figures:

C1: 20,000

C2: 2,000

C5: 20,000

Please revise the core indicators table accordingly.

Please adjust target for IW:LEARN Core Indicator 7.4 from "3" to "1"

21st of March 2024 (thenshaw): Addressed.

Agency's Comments

Thank you.

(1) Information added in the field below the Core indicators table.

(2) The names, WDPA ID, IUCN category and areas of the existing terrestrial and marine protected areas that the project will work in to improve management effectiveness are not available at this stage. The current estimates will be confirmed along with the exact names, WDPA ID, IUCN category and areas of PA will be confirmed during project preparation and included as part of the PAD.

(3) Indicator on [IW:Learn](#) activities added. The project did not want to include indicator 7.3 at this stage. During project preparation the team will work on whether this will be included as part of the project and include in the PAD accordingly.

(4) confirming that indeed the project will not target core indicator 8.

11/29/2023

Existing protected areas under improved management (marine and terrestrial - indicators 1 & 2) removed from the core indicators. Once identified in the project preparation, the indicators will be added at CEO Endorsement.

Indicator 5 updated.

2/28/2024

Core indicators adjusted as requested.

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

Secretariat's Comments N/A

Agency's Comments

5.6 RISKS

a) Are climate risks and other main risks relevant to the project described and addressed within the project concept design?

b) Are the key risks that might affect the project preparation and implementation phases identified and adequately rated?

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

Secretariat's Comments

23rd of October 2023 (thenshaw): Partly, please address the following:

Environmental and social safeguards: The project overall ESS risk is classified as high/substantial in the B. Policy Requirement, 'Overall Project/Program Risk Classification' in the Portal (page 12), and WB attached the Concept Environmental and Social review Summary (ESRS). Environmental and Social Commitment Plan (ESCP), Labor Management Plan (LMP) and Stakeholder Engagement Plan (SEP) will be prepared before the project appraisal. However, attached ESRS said the project's Environmental and Social Risk Classification as 'Moderate' (page 4). Please make them consistent and correct.

27th of November 2023 (thenshaw): Addressed. Risks are adequately described in World Bank PCN.

Agency's Comments

Thank you.

Following the PCN review meeting, it was decided to have a Substantial risk rating for E&S risks. a new ESRS has not be issued, the PCN minutes are used to indicate the upgrade in E&S risk rating. An updated ESRS will be issued at PAD.

Text from the PCN review meeting available below

1. **E&S risk rating and ESF requirements.** The meeting agreed to an E&S risk rating of "Substantial" given potential downstream project impacts. During the preparation process, the team will work closely with the E&S teams and the RSA to assess the downstream risks, and on this basis, reevaluate the risk rating for the appraisal stage. A Strategic Environmental and Social Assessment will be prepared during implementation and TORs will be prepared, cleared, and disclosed during preparation, and this will be noted in the C-ESRS before disclosure. The C-ESRS, Concept Note, and PID will also note ESS3 and ESS6 as relevant to the project.
2. **Other risks and mitigation measures.** The meeting agreed on an overall risk rating of "Moderate" with a "Substantial" for Political and Governance risk. It was also agreed that at this concept stage, focusing the project on Azerbaijan, Kazakhstan, and Turkmenistan could still have regional impacts.

5.7 Qualitative assessment

- a) **Does the project intend to be well integrated, durable, and transformative?**
- b) **Is there potential for innovation and scaling-up?**
- c) **Will the project contribute to an improved alignment of national policies (policy coherence)?**

Secretariat's Comments

23rd of October 2023 (thenshaw):

- (a) The project durability aspect is not clear in the PCN and submission. Please strengthen the text accordingly.
- (b) This is not clear in the PCN and submission. Please strengthened the text re: potential for innovation and scaling up
- (c) Yes

27th of November 2023 (thenshaw):

- (a) Addressed.
- (b) Addressed.

Agency's Comments

Thank you.

- (a) & (b) A Durability, innovation, and scale-up potential paragraph added to the Project Summary.

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

6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?

Secretariat's Comments 23rd of October 2023 (thenshaw): Yes

Agency's Comments Thank you.

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's Comments 23rd of October 2023 (thenshaw): Yes

Agency's Comments Thank you.

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's Comments 23rd of October 2023 (thenshaw): Yes

Agency's Comments Thank you.

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

23rd of October 2023 (thenshaw): Partly, please address the following:

(1) The private sector engagement fields are not completed. Given the nature of the project, it is expected that the private sector will play a major role in project implementation (especially in a project working on fisheries). Private sector is checked as a group that was consulted during project identification. Please describe these consultations and how the private sector will contribute to project outcomes.

(2) Indigenous Peoples and Local Communities is checked as stakeholders that were consulted during project identification. Please describe these consultations.

(3) Stakeholders, their relevant roles to project outcomes needs to be articulated in the Project Description.

(4) Gender. Gender is not adequately articulated in the project description. Please reflect gender perspectives in the section on Project Description/Project Components, in line with good gender mainstreaming practice.

27th of November 2023 (thenshaw):

(1) Addressed.

(2) Addressed.

(3) Addressed.

(4) Please see comment above on gender dimensions not articulated well enough in outputs.

30th of November 2023 (thenshaw):

(4) Addressed.

26th of February 2024 (thenshaw):

(1) Please include gender elements in the outputs themselves. For example, "Public awareness programs, including on gender mainstreaming and women empowerment, developed and implemented". "Gender-sensitive Regional and/or National Program of Action developed". "Fisheries value addition studies prepared and proposed actions supported, including specific studies and actions on gender dimensions"

Please include the paras 27 of the PCN in the portal submission at "The project will conduct gender gap assessments to identify relevant gender gaps and address and monitor them as part of the project".

(2) Regarding private sector, please consider including private sector engagement under the project regarding Output 2.1.5 Best practices for environmentally sound technology developed. Please then consider indicating private sector will be engaged (in the relevant field in the portal) and that it will be done so through this logical entry point. To then help increase the co-financing, please explore co-financing opportunities with targeted PS for this activity during PPG.

21st of March 2024 (thenshaw): Addressed.

Agency's Comments

Thank you.

(1) Private sector section denotes 'No' because the focus of this project is enhancing government capacity for pollution management and biodiversity conservation. Fisheries will not be addressed as per the advice of the PCN Review.

(2) Error in the selection has been corrected. Consultation was done with Civil society organizations (CSOs) and with the governments.

(3) Stakeholder section in the project description updated

(4) Gender section in the project description updated.

Thank you.

Gender dimensions added to the components and outcomes in the PCN

March 20, 2024: Thank you.

(1) Gender dimensions added to the components and outcomes in the PCN

(2) Portal field on private sector updated along with project document

7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided?

Secretariat's Comments

23rd of October 2023 (thenshaw): No, please address the following:

(1) The documented consultation process does not appear to include any ground-truthing in terms of intervention areas. Please provide this information accordingly.

27th of November 2023 (thenshaw):

(1) Addressed.

Agency's Comments

Thank you.

(1) The consultation process has been centered around government and CSOs, and additional consultations will be carried out during preparation and reflected in the PAD.

8 Annexes

Annex A: Financing Tables

8.1 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's Comments

23rd of October 2023 (thenshaw): No, please address the following:

(a) The description in the Project Context notes that the project "will be financed by a US\$12 million GEF grant, which will be divided equally between the three countries." This is not permitted for an IW regional project. All IW funds must be utilized for joint initiatives and cannot be divided equally among countries. Please revise accordingly.

The GEF financing and PPG tables must also be adjusted accordingly (all IW on one line in the table).

ANNEX A: FINANCING TABLES

GEF Financing Table

Indicative Trust Fund Resources Requested by Agency(ies), Country(ies), Focal Area and the Programming of Funds ⓘ

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Programming of Funds ⓘ	Grant / Non-Grant	GEF Project Grant(\$)	Agency Fee(\$) ⓘ	Total GEF Financing(\$)
World Bank	GET	Kazakhstan	Biodiversity	BD STAR Allocation: BD-1	Grant	903,317	81,298	984,615.00
World Bank	GET	Azerbaijan	Biodiversity	BD STAR Allocation: BD-1	Grant	903,317	81,298	984,615.00
World Bank	GET	Turkmenistan	Biodiversity	BD STAR Allocation: BD-1	Grant	903,317	81,298	984,615.00
World Bank	GET	Kazakhstan	International Waters	International Waters: IW-1	Grant	3,011,056	270,995	3,282,051.00
World Bank	GET	Azerbaijan	International Waters	International Waters: IW-1	Grant	3,011,056	270,995	3,282,051.00
World Bank	GET	Turkmenistan	International Waters	International Waters: IW-1	Grant	3,011,057	270,995	3,282,052.00
Total GEF Resources(\$)						11,743,120.00	1,056,879.00	12,799,999.00

Project Preparation Grant (PPG)

Is Project Preparation Grant requested? true

PPG Amount (\$) **1**
183,489

PPG Agency Fee (\$) 16,512

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Programming of Funds 1	Grant / Non-Grant	PPG(\$)	Agency Fee(\$)	Total PPG Funding(\$)
World Bank	GET	Kazakhstan	Biodiversity	BD STAR Allocation: BD-1	Grant	14,115	1,270	15,385.00
World Bank	GET	Azerbaijan	Biodiversity	BD STAR Allocation: BD-1	Grant	14,115	1,270	15,385.00
World Bank	GET	Turkmenistan	Biodiversity	BD STAR Allocation: BD-1	Grant	14,115	1,270	15,385.00
World Bank	GET	Kazakhstan	International Waters	International Waters: IW-1	Grant	47,048	4,234	51,282.00
World Bank	GET	Azerbaijan	International Waters	International Waters: IW-1	Grant	47,048	4,234	51,282.00
World Bank	GET	Turkmenistan	International Waters	International Waters: IW-1	Grant	47,048	4,234	51,282.00
Total PPG Amount						183,489.00	16,512.00	200,001.00

The indicative focal area elements breakdown is incorrect:

Indicative Focal Area Elements **1**

Programming Directions	Trust Fund	GEF Project Financing(\$)	Co-financing(\$)
BD-1-1	GET	2,709,951.00	21,500,000.00
IW-1-1	GET	9,033,169.00	21,500,000.00
Total Project Cost (\$)		11,743,120.00	43,000,000.00

Indicative Co-financing **1**

It should read \$3M BD and \$10M IW.

Further, between the LOEs and the resources of funds table, only Kazakhstan does not match. Please either change the Source of funds table (BD STAR) to match the Kazakhstan LOE financing table (CC STAR), or include the change in the revised LOE to

match the Sources of funds table. The country has enough money in both BD and CC to cover for this project either way.

27th of November 2023 (thenshaw):

Please note that source of funds allocation shows CC STAR for Kazakhstan, whereas the GEF financing table shows BD STAR for Kazakhstan. Please make the table congruent.

30th of November 2023 (thenshaw): Addressed.

Agency's Comments

Thank you.

Project financing tables and PPG tables have been updated.

Revised LOEs are still pending with the governments. The team has opted to submit the datasheet and will provide the revised LOEs as soon as they are available.

Error in portal entry for Kazakhstan LOE financing table has been corrected.

11/29/2023

Thank you. Kazakhstan would like to use their CC allocation as the source of funds for this project, the programming of the STAR allocation however will be BD-1.

Focal Area allocation?

Secretariat's Comments

23rd of October 2023 (thenshaw): Yes, but please see comment below. IW funds are for regional interventions and cannot be specifically allocated to project countries

27th of November 2023 (thenshaw): Addressed.

Agency's Comments

Thank you.

IW funds are now allocated to regional activities and not split up between countries.

LDCF under the principle of equitable access?

Secretariat's CommentsN/A

Agency's Comments
SCCF A (SIDS)?

Secretariat's CommentsN/A

Agency's Comments
SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat's CommentsN/A

Agency's Comments
Focal Area Set Aside?

Secretariat's CommentsN/A

Agency's Comments
8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments23rd of October 2023 (thenshaw): Yes

Agency's CommentsThank you.
8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat's Comments
23rd of October 2023 (thenshaw): Yes, but please address the following:

(1) Please seek additional sources of co-financing in PPG to align the project co-financing with the aspirational co-financing ratio of 1:7.

(2) The field below the co-financing table explains the investment mobilized for the Middle Trade and Transport Corridor: Opportunities and Challenges Advisory ASA and Kazakhstan Railway Maintenance Project. There are two additional WB grant/investment mobilized lines (\$5M each). Please explain in the field below the table what these grants are.

(3) Please explain what types of activities the \$4M in in-kind recurrent expenditures from each project country are.

27th of November 2023 (thenshaw):

(1) Addressed. Proponents will seek additional co-financing during PPG.

(2) Addressed.

(3) Addressed.

26th of February 2024 (thenshaw):

(1) Please seek additional sources of co-financing now, ahead of the endorsement deadline for consideration for the next work program. The ratio of gef grant to co-financing of 1:4 is too low for PIF stage.

(2) Please note that the co-financing table classifies the \$15M ASA and railway project as grant/investment mobilized. However, the description of investment mobilized notes that these "will provide in-kind co-financing to the project". Please revise accordingly. GEF Sec expects to see real grant/investment mobilized for this project.

(3) Are UNEP/the Tehran Convention Secretariat able to provide co-financing as part of the execution arrangement/hosting of a project coordination unit? If so, please include as project co-financing in the table.

21st of March 2024 (thenshaw): Addressed.

Agency's Comments

Thank you.

(1) The team will be working on securing additional co-financing during preparation

(2) The additional grants (\$500,000 each) are through 2 ongoing ASAs in the bank, one from the Japanese TF for Middle Corridor PASA and the other through a PROBLUE TF for fisheries ASA. Additional text provided in the co-finance section of the portal entry.

(3) explanation on in-kind financing added

March 20, 2024: Thank you.

(1) Co-financing added to the project. the project was able to increase co-financing from bank operations to \$20 million each. Additional sources of co-financing will be explored during project preparation

(2) error corrected; this is investment mobilized.

(3) ongoing discussion with Tehran convention and others to explore additional co-financing.

Annex B: Endorsements

8.4 Has the project been endorsed by the country? (ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?

Secretariat's Comments

23rd of October 2023 (thenshaw): Yes, but please see comment in next section. New LOEs are required.

27th of November 2023 (thenshaw):

(1) Noted. Please upload new LOEs on resubmission.

30th of November 2023 (thenshaw):

(1) Please upload LOE from Kazakhstan

26th of February 2024 (thenshaw):

(1) Addressed. See comment on Turkmenistan LOE below.

Agency's Comments

Thank you.

New LOEs will be uploaded as soon as they are received from the governments.

11/29/2023

New LOEs uploaded.

02/15/2024

New LOE for Kazakhstan Uploaded

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

Secretariat's Comments

23rd of October 2023 (thenshaw): Yes, but please see comment in next section. New LOEs are required.

27th of November 2023 (thenshaw):

(1) Noted. Please upload new LOEs on resubmission.

30th of November 2023 (thenshaw):

(1) Please upload LOE from Kazakhstan

26th of February 2024 (thenshaw):

(1) Addressed. See comment on Turkmenistan LOE below.

Agency's Comments

Thank you.

New LOEs will be uploaded as soon as they are received from the governments.

11/29/2023

New LOEs uploaded.

02/15/2024

New LOE for Kazakhstan Uploaded

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

Secretariat's Comments

23rd of October 2023 (thenshaw): No, please address the following:

(1) IW funds are for regional interventions and cannot be specifically allocated to project countries. New LOEs are required to reflect this policy. The financing table in each LOE must reflect Focal Area Source: IW | Total: \$10M (whole amount) , not \$3,333,333 per country. In other words, all LOEs present the GEF Project Financing and PPG + the correspondent agency fees individually. New LOEs are required reflecting the whole amount of the project in the table. Please revise accordingly.

27th of November 2023 (thenshaw):

(1) Noted. Please upload new LOEs on resubmission.

30th of November 2023 (thenshaw):

(1) Please upload LOE from Kazakhstan

26th of February 2024 (thenshaw):

(1) Kazakhstan LOE uploaded to portal

The Turkmenistan LOE is missing two elements

(a) "The STAR resources indicated above (US\$1,000,000) are being endorsed for the project listed above and submitted by the GEF Implementing Agency via the GEF Portal.

(b) The footnote "Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate"

Please secure a new LOE from the Turkmenistan OFP.

21st of March 2024 (thenshaw): Addressed.

Agency's Comments

Thank you.

New LOEs will be uploaded as soon as they are received from the governments. New LOEs project tables are adjusted accordingly.

11/29/2023

New LOEs uploaded.

02/15/2024

New LOE for Kazakhstan Uploaded

March 20, 2024: Thank you. New LOE added.

8.5 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?

Secretariat's Comments N/A

Agency's Comments
Annex C: Project Location

8.6 Is there preliminary georeferenced information and a map of the project's intended location?

Secretariat's Comments

23rd of October 2023 (thenshaw): Partly, please address the following:

(1) Annex C does not include project intervention coordinates. Please revise accordingly.

27th of November 2023 (thenshaw):

(1) Addressed.

Agency's Comments

Thank you.

Coordinates added to the map in Annex C

Annex D: Safeguards Screen and Rating

8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?

Secretariat's Comments

23rd of October 2023 (thenshaw): Yes

*The World Bank ESRS states that OP 7.50 and OP 7.60 do not apply.

Agency's Comments Thank you.

Annex E: Rio Markers

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

Secretariat's Comments N/A

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments

23rd of October 2023 (thenshaw): Yes

26th of February 2024 (thenshaw): The taxonomy worksheet no longer appears in the submission. Please re-tag key words and ensure Annex F is populated in the portal.

21st of March 2024 (thenshaw): Addressed.

Agency's Comments

Thank you.

Annex F does not auto populate; however the tags are reflected and the team was able to copy the selection into the Annex.

Annex G: NGI Relevant Annexes

8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Comments N/A

Agency's Comments

9 GEFSEC Decision

9.1 Is the PIF and PPG (if requested) recommended for technical clearance?

Secretariat's Comments

23rd of October 2023 (thenshaw): No, please address above comments and resubmit.
Thank you.

27th of November 2023 (thenshaw): No, please address above comments and resubmit.
Thank you.

30th of November 2023 (thenshaw): No, please upload outstanding LOE and resubmit.
Thank you.

*Some GEF Policy-related comments may still need to be addressed following subsequent review.

26th of February 2024 (thenshaw): No, please address above comments and resubmit.
Thank you.

21st of March 2024 (thenshaw): No, please address above comments and resubmit. Thank you.

21st of March 2023 (thenshaw): Yes

Agency's Comments

Thank you.

02/15/2024

New LOE for Kazakhstan Uploaded

9.2 Additional Comments to be considered by the Agency at the time of CEO Endorsement/ Approval

Secretariat's Comments

26th of February 2024 (thenshaw):

(1) Please secure additional sources of co-financing. The project grant/co-financing ratio is only 1:4 at PIF stage.

Agency's Comments March 20, 2024: Thank you. Additional co-financing will be explored during project preparation.

Review Dates

	PIF Review	Agency Response
First Review	10/23/2023	
Additional Review (as necessary)	11/27/2023	
Additional Review (as necessary)	11/30/2023	
Additional Review (as necessary)	2/26/2024	
Additional Review (as necessary)	3/21/2024	