

Implementation of the National Biosafety Mechanism in the Kyrgyz Republic in accordance with the Cartagena Protocol on Biosafety

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

10813

Countries

Kyrgyz Republic

Project Name

Implementation of the National Biosafety Mechanism in the Kyrgyz Republic
in accordance with the Cartagena Protocol on Biosafety

Agencies

FAO

Date received by PM

2/2/2022

Review completed by PM

6/1/2022

Program Manager

Hannah Fairbank

Focal Area

Biodiversity

Project Type

MSP

PIF

CEO Endorsement

Part I ? Project Information

Focal area elements

1. Does the project remain aligned with the relevant GEF focal area elements as presented in PIF (as indicated in table A)?

Secretariat Comment at CEO Endorsement Request

April 12, 2022 HF:

Yes, and small adjustments have been explained.

Agency Response

Project description summary

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

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comment cleared.

April 12, 2022 HF:

1.) The third line/row up from the bottom and the third column from the right of Table B reads "GET" but it is unclear what that is referring to as the far right column is co-finance and the second to right column is GETF resources. Please correct/remove.

Agency Response

RE 12 Apr:

This case has been resolved with additional clarification from the GEF Senior Operations Officer.

3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Co-financing

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

Secretariat Comment at CEO Endorsement Request

April 12, 2022 HF:

Yes. Noting an increase in co-finance from PIF.

Agency Response

GEF Resource Availability

5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?

Secretariat Comment at CEO Endorsement Request

June 1, 2022 HF:

Comment cleared.

May 23, 2022 HF:

Please note the GEF policy on proportionality of PMC and strive for increased burden sharing. Please revise.

April 12, 2022 HF:

1.) PMC burden sharing/proportionality in Table B. Unclear why the PMC amount for co-finance has decreased by \$100,000 from PIF whereas the co-finance amount has increased substantially, while the GEF PMC amount has stayed nearly the same. Please note the GEF policy on proportionality of PMC allocations between GEF and co-finance. Please revise accordingly.

Agency Response

RE 23 May:

We have updated the PMC accordingly in the project budget and the co-financing tables. Both Ministry of Agriculture and the Ministry of Natural Resources, Ecology and Technical Supervision increased their co-financing by USD 300,000 each compared to the PIF stage, and a part of the increased portion has been allocated to the PMC.

RE 12 Apr:

During PPG consultations, the government has indicated a preference to allocate co-financing to the components, especially for the KM component as the project will contribute to enhancing the Cartagena Protocol in the Central Asian region.

Project Preparation Grant

6. Is the status and utilization of the PPG reported in Annex C in the document?

Secretariat Comment at CEO Endorsement Request

April 12, 2022 HF:

Yes

Agency Response

Core indicators

**7. Are there changes/adjustments made in the core indicator targets indicated in Table E?
Do they remain realistic?**

Secretariat Comment at CEO Endorsement Request

April 12, 2022 HF:

Yes

Agency Response

Part II ? Project Justification

1. Is there a sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?

Secretariat Comment at CEO Endorsement Request

April 12, 2022 HF:

Yes.

Agency Response

2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comment cleared.

April 12, 2022 HF:

1.) It is notable that the draft "Law on Restrictions on Cultivation, Production, Import and Sales in the Kyrgyz Republic of Products Containing Genetically Modified Organisms" has had a long and winding path but has still not yet been adopted. Given that, please describe how this project (particularly Component 1, Outcome 1.1)-the "policy and regulatory biosafety framework"-relates to this draft law-and how/why the framework will be effective and have a different and successful outcome given the current context and history of the draft law.

Agency Response

RE 12 Apr:

Membership of the Eurasian Economic Union (EAEU) has provided additional incentive and political will for the Kyrgyz Republic to move forward with the implementation of the Cartagena Protocol on Biosafety, given the requirements for technical regulations related to GM food and feed. The project will build on the processes to date, including the groundwork laid through consultations on the previous draft law. A dedicated project on biosafety, with one focal area on the policy and regulatory framework, will help institutionalise and consolidate previous processes while building them into the project outcomes. This information has now been better reflected in Section 2.

3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?

Secretariat Comment at PIF/Work Program Inclusion

May 23, 2022 HF:

Comments cleared.

April 12, 2022 HF:

1.) Please describe the alternative scenario envisioned as a result of this project (beyond a description of the project objective/activities). Please revise.

2.) Output 1.1: Please address question regarding the current draft biosafety law and relation to work towards Output 1.1 (e.g. how will this project overcome the current/past barriers? how will this project be different? etc)

Agency Response

RE 12 Apr:

1) Please see additional information in the alternative scenario section.

2) Relevant section has been updated accordingly.

4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?

Secretariat Comment at CEO Endorsement Request

April 12, 2022 HF:

Yes

Agency Response

5. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comment cleared.

April 12, 2022 HF:

Please describe the incremental cost reasoning for this project in Section 3.

Agency Response

RE 12 Apr:

Relevant section has been updated accordingly.

6. Is there further and better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

June 1, 2022 HF:

Comment cleared.

May 23, 2022 HF:

Please simply state in a few sentences **how** the investment will lead to Global Environmental Benefits and an improved situation for BD in the country. The current text is mostly rehashing of global goals and entry points.

April 12, 2022 HF:

1.) Please describe the expected contribution to global environmental benefits of this project. The current text in section 4. seems to relate to Focal Area alignment, rather than the intended GEBs (e.g. for biodiversity...)

Agency Response

RE 23 May:

We have included the requested information in the GEBs? section.

RE 12 Apr:

Relevant section has been updated accordingly.

7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comments cleared.

April 12, 2022 HF:

- 1.) Please describe the project's approach to sustainability of training/capacity-building efforts. How training/capacity building efforts be institutionalized for post-project sustainability/impact?
- 2.) Lack of financing has repeatedly been raised as a key limiting factor to effective implementation of the Cartagena Protocol. Please directly address in the sustainability section how this project will address the financial sustainability of the implementation of the CP (e.g. beyond the project period/funding). Great to have participation of six government agencies in project.

Agency Response

RE 12 Apr:

- 1) Training and capacity building will be institutionalized through training of core staff in competent authorities, and also by the development of training material that will be used in further training courses. The training will build a national biosafety network of competent staff, which will be able to organize further exchange and update of knowledge. The training material and guidelines that will be developed in Components 1 and 2 will have a longer and more sustainable impact than previous efforts to implement a biosafety framework in the country. The text has been added to the relevant section.
- 2) Also as this GEF project will be the first initiative in supporting the implementation of the Cartagena Protocol on Biosafety in Kyrgyzstan, there are few co-financing opportunities available at this time. However, seven government agencies are committed to this project and will provide co-financing which demonstrate the wiliness of the government with the process and will allow a strong institutionalization of the process. The text has been added to the relevant section.

Project Map and Coordinates

Is there an accurate and confirmed geo-referenced information where the project intervention will take place?

Secretariat Comment at CEO Endorsement Request

April 12, 2022 HF:

NA given national scope of project.

Agency Response

Child Project

If this is a child project, is there an adequate reflection of how it contributes to the overall program impact?

Secretariat Comment at CEO Endorsement Request

NA

Agency Response

Stakeholders

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

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comment cleared.

April 12, 2022 HF:

Please include 'means of engagement' for all stakeholders in table.

Agency Response

RE 12 Apr:

The tables have been updated accordingly.

Gender Equality and Women's Empowerment

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

Secretariat Comment at CEO Endorsement Request

April 13, 2022 HF:

Yes.

Agency Response

Private Sector Engagement

If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comment cleared.

April 12, 2022 HF:

It seems as though private sector engagement would be important to the effectiveness of implementation of biosafety policy stemming from this project. At PIF stage there was a comment that the PS would be engaged during PPG, but the PS section of the CEO approval document is not clear about the extent-to-which this occurred. If intended, please further elaborate plans for working with the private sector during project implementation (information flow, awareness raising etc)

Agency Response

RE 12 Apr:

Section 4 has been updated accordingly.

Risks to Achieving Project Objectives

Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comment cleared.

April 13, 2022 HF:

- 1.) Given the biosafety law hasn't yet been passed wouldn't this be a potential project risk for mitigation?
- 2.) Lack of financial resources is identified throughout the project as a key barrier to implementation of the CP. Seems as though this is a continuing risk to project success (beyond financing for labs)? If so, please include and elaborate potential mitigation measures.

Agency Response

RE 12 Apr:

- 1) and 2) The risk table has been updated.

Coordination

Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?

Secretariat Comment at CEO Endorsement Request

June 1, 2022 HF:

Comments cleared. **Partial self-execution of this project by FAO is approved based on clear justification and OFP request, with the understanding that the execution and institutional arrangement will be re-visited mid-way.**

May 23, 2022 HF:

Follow-up clarifications:

1. *What execution functions will FAO perform and how is this justified? The justification document should provide a simple list upfront and then provide clear and direct justification for FAO executing the specific areas identified.* PM noting that the current justification document provides a justification of low technical capacity for administrative execution role which is a total disconnect. Please substantially revise and clarify.
2. *What will FAO charge/what will it cost to perform this function?*

April 12, 2022 HF:

Institutional arrangement/execution:

The request for FAO to execute a portion of this project **was not informed at PIF stage**, in fact, the PIF clearly states: "FAO will act as Implementing Agency, and as such will provide technical backstopping to the Executing Agency." Given the very clear GEF policy regarding separation of Implementing and Executing functions to avoid conflict of interest and to build country capacity, such arrangement would only be considered by the GEFSEC in the most extenuating and exceptional of circumstances.

1.) **Biosafety projects are expected to be entirely aimed at building capacity of the country in biosafety** to implement The Protocol. Thus, if FAO plays an execution role, this is at odds with the intent of GEF support to the implementation of the Protocol; and what/how would in-country capacity be built?

2.) Further, please clarify in what Ministry the work of biosafety is placed. We note that the Ministry of Environment is leading the project, but often **the Ministry of Agriculture is involved in the work of biosafety**. We see the Min of Ag is on the PSC, but **please clarify what their role would be, if any, in execution of the project**.

3.) **The costs for FAO to assume the partial execution role as proposed is not clear** (e.g. the costs that are being charged by FAO to perform execution functions under this project). This needs to be clearly differentiated from the percent of funds proposed to be managed by FAO (e.g. cost of FAO performing execution function versus the cost of the consultants/staff hired by FAO performing the HR function etc). The FAO execution costs percentage must be a small fraction of the total to even consider.

4.) **A written justification and accompanying OFP request letter must clearly detail the points above**, consistently refer to the execution support (currently both full and partial are referenced), provide a description of the other in-country and international organizations that have been evaluated to take on the execution roles and include a strong justification for anything other than full government execution of this project.

5.) **All project decisions need to be taken by the government lead and not FAO**. Please state this clearly in the OFP letter, the institutional arrangement section of the CEO approval document as well as in the FAO PRODOC.

Agency Response

RE 23 May:

1. 1. The justification document has been revised accordingly. In addition, the Kyrgyz Republic has submitted two national reports (2nd and 3rd reports) in 2011 and 2015 since the adoption of the Cartagena Protocol on biosafety. In these reports, the country

states that (<https://bch.cbd.int/en/database/NR3/BCH-NR3-KG-109499-2>) it has partially established a national framework for conducting risk assessments before making decisions regarding LMOs. However, it also describes that the current framework does not include procedures for identifying and/or training national experts to conduct risk assessments; and less than 10 people have been trained in risk assessment, monitoring, management and control of LMOs. The 2015 report indicates the difficulty the country has been facing to build a national capacity on the topic, as the implementation of the protocol hasn't evolved since 2008. The project's execution arrangements are designed to address those gaps to build the required capacities to sustain results over time.

2. FAO's limited execution support will not bring any extra cost to the project. On the contrary, FAO will subsidize and co-fund admin support and capacity development with its own staff time and resources.

RE 12 Apr:

1) The project will be partially executed by FAO and partially by the country, keeping the goal of capacity building FAO will play the role of transferring the knowledge to the country as it is not possible to build capacity if, as clearly stated in the PRODOC, the county has no capacity.

2) The Ministry of Agriculture will implement 14% of the project mostly linked to training and building capacity (please see Excel budget table column W).

3) FAO partial execution poses no extra-cost for the project but rather cost saving opportunities as PMC will be cost shared with FAO's agency fees and FAO's own resources.

4) Updated OFP and FAO letters accordingly.

5) Updated OFP and FAO letters accordingly.

Consistency with National Priorities

Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?

Secretariat Comment at CEO Endorsement Request

April 13, 2022 HF:

Yes.

Agency Response

Knowledge Management

Is the proposed Knowledge Management Approach for the project adequately elaborated with a timeline and a set of deliverables?

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comment cleared.

April 13, 2022 HF:

Please reference description of M& E plans here given they should be considered as a part of KM.

Agency Response

RE 13 Apr:

The ProDoc has been updated accordingly.

Environmental and Social Safeguard (ESS)

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

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comment cleared.

April 13, 2022 HF:

1.) Please include a description of "measures to address identified risks and impacts" in section 11.) ESS of the CEO approval document.

Agency Response

RE 13 Apr:

The Portal has been updated accordingly. Based on the established policies, for low-risk projects, we do not prepare measures to address identified risks and impacts. However, overall project risks and mitigation measures have been identified and included in the relevant section.

Monitoring and Evaluation

Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?

Secretariat Comment at CEO Endorsement Request

April 13, 2022 HF:

Yes

Agency Response

Benefits

Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

April 13, 2022 HF:

Yes.

Agency Response

Annexes

Are all the required annexes attached and adequately responded to?

Secretariat Comment at CEO Endorsement Request

June 7, 2022 HF:

Comment cleared.

June 6, 2022 HF:

Please note, GEF resources can't be used to provide a lump sum for miscellaneous expenses. Please revise the budget to provide sufficient detail on this line item so it can be reviewed for GEF funding eligibility.

April 13, 2022 HF:

Yes

Agency Response

RE 6 June:

Thank you for your feedback. We revised the budget and provided detail of the miscellaneous expenses as ?Office operation (stationeries & other utilities)?.

Project Results Framework

Secretariat Comment at CEO Endorsement Request

April 13, 2022 HF:

Clear

Agency Response

GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request

May 23, 2022 HF:

Comment cleared.

April 13, 2022 HF:

Please see comments on sustainability, scaling-up, private sector which were also included at PIF to be further addressed at PPG.

Agency Response

RE 13 Apr:

Thank you for your feedback. The ProDoc has been updated accordingly.

Council comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response

STAP comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response
Convention Secretariat comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response
Other Agencies comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response
CSOs comments

Secretariat Comment at CEO Endorsement Request NA

Agency Response
Status of PPG utilization

Secretariat Comment at CEO Endorsement Request
April 13, 2022 HF:

Clear

Agency Response
Project maps and coordinates

Secretariat Comment at CEO Endorsement Request
April 13, 2022 HF:

Clear

Agency Response
Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only)

Secretariat Comment at CEO Endorsement Request

NA

Agency Response

Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)

Secretariat Comment at CEO Endorsement Request NA

Agency Response

GEFSEC DECISION

RECOMMENDATION

Is CEO endorsement recommended? (applies only to projects and child projects)

Secretariat Comment at CEO Endorsement Request

June 7, 2022 HF:

Yes. I recommend this project for CEO endorsement. PM approves partial self-execution by FAO per justification memo provided and OFP request.

June 6, 2022 HF:

Please see final comment on budget (in annex section highlighted above). Please revise accordingly and resubmit ASAP. Project's second cancellation deadline is June 10th, 2022.

June 1, 2022 HF:

Yes. I recommend this project for CEO endorsement. PM approves partial self-execution by FAO per justification memo provided and OFP request.

Please note that the 2nd cancellation deadline for this project is June 10th, 2022. Please expedite review and clearance to avoid cancellation.

April 13, 2022 HF: No, please address issues in review sheet.

Review Dates

**Secretariat Comment at
CEO Endorsement**

**Response to
Secretariat
comments**

First Review	4/13/2022	
Additional Review (as necessary)	5/23/2022	
Additional Review (as necessary)	6/1/2022	
Additional Review (as necessary)	6/6/2022	
Additional Review (as necessary)	6/7/2022	

CEO Recommendation

Brief reasoning for CEO Recommendations