Unlocking the groundwater potential of the Kilimanjaro Water Tower

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID
11547
Countries
Regional (Kenya, Tanzania)
Project Name
Unlocking the groundwater potential of the Kilimanjaro Water Tower
Agencies
FAO
Date received by PM
12/16/2025
Review completed by PM

Program Manager
Ines Benabdallah
Focal Area
International Waters
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
6/02/2026:

No, Please remove the "**Project Sector (CCM Only):**Mixed & Others".

General comment:

All images, graphs and diagrams (in background, ToC, map) uploaded in the CER are unintelligible and of low quality. Kindly upload better quality images.

Some information is not provided under the correct section of the CER template (for example, stakeholder engagement, KMGBF targets, etc). Please move sections accordingly to adhere to the template.

10/04/2026:

Addressed.

Agency Response
Well noted. We have now provided high-quality images, including the ToC.

15/05/2026

No action taken

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

Secretariat comment at CEO Endorsement Request
6/02/2026:

Yes.

Agency ResponseNo action taken

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
6/02/2026:

Partly. The summary is too long and detailed, please revise to reduce the background description and to focus more on how the project will deliver the GEBs and other expected benefits like improved transboundary cooperation.

10/04/2026:

Partly. While the GEB and transboundary cooperation framing has improved, the summary remains too long. The background and technical detail (e.g., aquifer geology, recharge mechanisms, upstream-downstream dynamics) have not been sufficiently reduced and should be moved to the body of the document. Please shorten the summary further, keeping the focus on the project objective, how it will deliver GEBs, and the expected benefits.

24/05/2026:

Addressed.

Agency Response

We have revised the Project Summary and reduced the text significantly to focus more clearly on the project objective, how the project will deliver Global Environmental Benefits, and the expected benefits, including improved transboundary cooperation. Background and technical detail will be reduced accordingly.

15/05/2026

The Project Summary has been further streamlined to reduce background and technical detail, with detailed hydrogeological descriptions, recharge processes, and system dynamics moved to the main body of the document. The revised summary now focuses more clearly on the project objective, the delivery of Global Environmental Benefits, and expected outcomes.

Specifically, the text has been condensed to emphasize: (i) the project?s role in strengthening transboundary groundwater management for water security and climate resilience; (ii) the three core pathways for delivering GEBs?improved knowledge and monitoring, ecosystem-based protection of recharge zones, and strengthened transboundary governance; and (iii) the expected environmental and socio-economic benefits, including improved ecosystem resilience, sustainable groundwater use, and enhanced cooperation between Kenya and Tanzania.

The revised version also retains only essential contextual information necessary to frame the problem, while ensuring the summary remains concise, focused, and aligned with GEF guidance

3. Project Description Overview
a) Is the project objective statement concise, clear and measurable?
b) Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?
c) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?
d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
e) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

6/02/2026:

a) Yes.

b) Partly - Outputs are often worded as outcomes (for example: 2.1.4 *Protection of groundwater recharge areas, in particular the cloud forests of the Kilimanjaro, by addressing main threats, engaging local communities, and empowering women*) and are too lengthy in text, please revise to keep these concise and to the point.

c) Yes.

d) Yes.

e) Yes. Please remove the text in the box under justification for PMC:

Please provide justification

During the PPG phase, the budget was carefully refined to align with the detailed technical design, country priorities and GEF cost-ceiling rules, while keeping the overall GEF grant envelope unchanged at USD 7,105,936. The main adjustments consist of: (i) an increase of USD 200,000 under Component 2 (from USD 2,030,267 to USD 2,230,267) to finance drilling of exploratory boreholes (Output 2.1.1), front-loading critical field verification to de-risk the hydrogeological model and final site selection; (ii) a corresponding reduction of USD 200,000 under Component 3 (from USD 1,353,512 to USD 1,153,512), while preserving all core outputs and sequencing analytical work to build on the insights generated by C2 exploratory wells; (iii) a significant reduction of Component 6 (from USD 676,756 to USD 213,178) as this component now includes only M&E activities corresponding to 3% of the total budget (USD 213,178) while the PMC, equal to 5% of the components' budget (USD 338,378) has been reported separately; and (iv) the outstanding USD 125,200 available under Component 6 have been reallocated to Component 5 (from USD 609,080 to USD 734,280) to reinforce country-prioritised activities on stakeholder engagement, capacity development, knowledge and communications, and gender and social inclusion. Components 1 and 4 remain unchanged at their PIF levels (USD 1,421,187 and USD 1,015,134, respectively), as their scope and costing were confirmed as adequate during the PPG.

10/04/2026:

b) Partly. Output 2.1.4 has been appropriately revised. However, the issue has not been addressed systematically across the Results Framework. Several outputs remain too lengthy or are still worded as outcomes rather than deliverables (e.g., 1.1.3, 3.1.4, 3.1.5, 5.1.4). Please review and revise all outputs to ensure they are concise, deliverable-level statements throughout.

e) Not addressed. Please remove the budget justification text.

24/05/2026:

Addressed.

Agency Response

a) No action taken

(b) We revised the Results Framework to ensure outputs are phrased as concise, deliverable-level statements rather than outcomes, and we streamlined lengthy wording throughout. In particular, Output 2.1.4 was reworded to: ?Recharge-area protection measures implemented (including in Kilimanjaro cloud forests), with inclusive community participation.? Enabling elements such as addressing threats, local engagement and women?s empowerment were retained under the relevant activities and indicators rather than within the output statement

c) No action taken

d) No action taken

Text removed for the budget justification

15/05/2026

b) The Results Framework has been systematically reviewed and revised to ensure that all outputs are concise and clearly articulated as deliverable-level statements in line with GEF guidance.
All outputs have been refined to reflect tangible products, systems, or actions with clear end deliverables. In addition, activity-based or descriptive language has been removed or streamlined.
As guided, outputs previously identified (e.g., 1.1.3, 3.1.4, 3.1.5, and 5.1.4) have been further strengthened, and similar adjustments have been applied across all components to ensure consistency and clarity.
These revisions ensure a clear distinction between outputs and outcomes, while maintaining sufficient technical specificity to support implementation, monitoring, and reporting.
We strongly agree with this comment as it has improved the quality of presentation of the project?s outputs.

e) Addressed

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

6/02/2026:

a) The background and problem analysis section is too long/detailed. Kindly revise to make this section more concise.

b) This information is provided under "B. Project Description". The roles of stakeholders have been described. Private sector is seen as a stakeholder.

c) N/A

10/04/2026:

a) Addressed.

Agency Response

(a) We revised the Background and Problem Analysis under the Project Rationale to be more concise by removing overly detailed narrative and technical elaboration, while retaining a clear systems perspective (water tower?recharge?aquifer connectivity?groundwater-dependent ecosystems?users), the key drivers of environmental degradation and climate vulnerability, and the core barriers the project design addresses. The previous texts with detailed climate statistics, sector water demand descriptions, and localized examples have been annexed.

(b) No action taken

(c) No action taken

15/05/2026
No action taken

5 B. Project Description
5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?
b) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?
c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?
d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

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

f) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?
g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?
h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?
i) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?
j) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?
k) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?
l) Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

6/02/2026:

a) Partly - The ToC diagram is unintelligible. Please upload a higher quality diagram.

b) Yes.

c) Please add a paragraph that clearly and concisely explains why the project approach has been selected over other potential options.

d) Yes.

e) Yes.

f) Please see comments on budget below.

g) The project will ensure resilience through its objective to ensure sound management of groundwater resources between the project proponets.

h) Yes.

i) Yes.

j) Yes.

k) The project's contribution to policy coherence is outlined in the project document.

l) Yes.

10/04/2026:

c) Not addressed. Paragraphs 48?50 provide additional technical elaboration on the selected methodology but do not respond to the comment. Please add a concise paragraph that explicitly discusses alternative project approaches that were considered and clearly explains why the selected approach was preferred over these alternatives.

24/05/2026:

Addressed.

Agency Response
a) The ToC diagram has been updated,, and a clearer, higher-quality version has been provided.

b) No action taken

c) See the new text of paragraphs 48-50 (replacing previously para.41). Further description and clarifications have haven provided.

d) No action taken

e) No action taken

g) No action taken

h) No action taken

i) No action taken

j) No action taken

k) No action taken

l) No action taken

15/05/2026

c) A concise paragraph has now been added at the start of the ?Project Description? to explicitly address alternative project approaches considered during the design phase. The revised text outlines three key alternatives?(i) optimization of shallow aquifers and natural springs, (ii) surface water and conservation-based interventions, and (iii) technical groundwater assessments without integrated governance?and clearly explains the limitations of each in addressing long-term water security and transboundary management challenges.

The paragraph further clarifies the rationale for the selected approach, highlighting its integrated nature, combining hydrogeological assessment, development of deeper aquifers, ecosystem-based recharge protection, and strengthened transboundary governance, thus providing a clear justification of why the chosen approach is better suited to address the root causes of groundwater insecurity and deliver sustainable, long-term environmental and socio-economic benefits.

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project
a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?
b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?
c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).

Secretariat comment at CEO Endorsement Request
6/02/2026:

a)

i) The proposed governance structure is complex: Please explain the need for three layers of execution (UNESCO-hosted PMU, government partners and TNC's Jumuiya Water Fund). How can this proposed arrangement is considered effective and cost-efficient in the project context?

ii) Please explain the need for both a technical committee (that includes universities in its membership) and a Knowledge & Scientific Advisory Board and how the project will ensure these bodies will to be engaged throughout the project period given their elective/voluntary nature.

ii) Please explain the reason behind having UNESCO (the EA and PSC secretariat) as a voting member of the PSC, when the PSC is meant to approve the workplan and budget proposed by the secretariat.

b) N/A

c) No, but it is noted that this is provided under section "C. ALIGNMENT WITH GEF-8 PROGRAMMING STRATEGIES AND COUNTRY/REGIONAL PRIORITIES". Kindly move paragraphs 283-287 under this section.

The following comment applies the latter referenced paragraphs: Please further elaborate on *how* the project will coordinate and cooperate with ongoing projects.

10/04/2026:

a) i) Addressed.

ii) Partly. The distinct roles of the TC and KSAB are now clearer. However, the comment on ensuring sustained engagement of these bodies throughout the project period given their voluntary/elective nature has not been addressed. Please explain what mechanisms will be put in place to ensure consistent and meaningful participation.

iii) Addressed.

c) Partly. The paragraphs have been relocated, though noted they are now under the Theory of Change section rather than the Institutional Arrangements section as requested. The elaboration on coordination with ongoing initiatives remains insufficient ? the updated text focuses primarily on the Jumuiya Water Fund and the Pangani Basin initiative, while the broader set of programmes referenced in the agency response (e.g., KWSCRP, GW4R/GWIS, UNESCO-led programmes) is not substantively reflected in the document. Please further elaborate on coordination mechanisms with these specific initiatives, and ensure the description goes beyond generic statements to explain how complementarity and avoiding duplication will be operationalized in practice.

d) The CEO Endorsement request refers to both a ?Project Coordination Unit? and to a ?Project Management Unit?, seemingly interchangeably. Please use consistent terminology or use the Institutional Arrangements section to clarify the difference between the PMU and PCU.

24/05/2026:

Addressed.

Agency Response

a)

i) We have further simplified the governance structure of the project and a new version of the organogram has been provided.

ii) The inclusion of both the Technical Committee (TC) and the Knowledge & Scientific Advisory Board (KSAB) reflects explicit country preferences expressed during national and binational consultations. Kenya and Tanzania stakeholders requested a structure that (i) Technical Committee (TC) ? an operational, implementation-focused body that supports day-to-day technical delivery and quality control. It will review and guide workplans, TORs and technical specifications; ensure harmonization of methods and data standards between Kenya and Tanzania; validate interim technical outputs (e.g., monitoring design, datasets, modelling products); and provide a structured interface with national technical institutions. University members are included to strengthen applied research links, ensure methodological rigor, and support capacity development and uptake within national training and research systems.

iii) Paragraph 293: The Knowledge and Scientific Advisory Board (KSAB) consists of a distinguished group of regional and international experts in the fields of hydrogeology, volcanology, and hydrogeochemistry. This board serves as a valuable resource for providing on-demand advice to the Project Management Unit (PMU) and the Project Steering Committee (PSC). In addition, the SAB may also be consulted by the Technical Committees (TCs) when relevant expertise is needed.

It is important to note that the KSAB operates in an advisory capacity only and does not hold any management or governance authority. When invited, members of the KSAB participate in PSC sessions as non-voting observers, offering their insights and clarifications on specific matters. Participation in the SAB is entirely voluntary, allowing for flexibility in engagement while ensuring that the project benefits from the highest level of scientific guidance.

b) No action taken

c) The referenced paragraphs have been relocated to the Theory of Change section (paragraphs 71-80), where they more appropriately describe the causal pathways, assumptions, and enabling conditions underpinning project outcomes.
In addition, the section has been further strengthened to provide a more detailed description of how the project will coordinate and cooperate with ongoing GEF and non-GEF initiatives. This includes explicit articulation of coordination mechanisms with ongoing national programmes and investments in both Kenya and Tanzania, as well as with regional and global initiatives.
The revised text elaborates on how KTAS will build on and align with UNESCO-led initiatives (including GW4R/GWIS, HoA-GaFa, CRIDA applications, Lake Turkana programme, and the AWARE project), and with co-financed and donor-supported programmes such as the Kenya Water Security and Climate Resilience Project (KWSCRP), groundwater mapping and modelling initiatives, and nature-based solutions programmes such as the Mombasa Water Fund.
Coordination will be operationalized through shared technical platforms, harmonized data systems, joint planning processes, stakeholder engagement structures, and regular consultation mechanisms at national and transboundary levels. This approach ensures complementarity, avoids duplication, leverages co-financing, and enhances the sustainability and impact of project outcomes.

15/05/2026

a) i) No action taken

ii) Additional text has been included under the Institutional Arrangements section (paras. 250?251) to explicitly address mechanisms for ensuring sustained and meaningful engagement of the Knowledge and Scientific Advisory Board (KSAB) and the Technical Committees (TCs) throughout the project lifecycle. Paragraph 251 has also been expanded to clarify incentives and facilitation measures supporting voluntary participation, including recognition of contributions, participation in technical workshops and exchanges, professional visibility, networking opportunities, and engagement in key regional and transboundary decision-making processes. The added paragraphs outline structured and institutionalized measures, including formal linkage of KSAB and TC inputs to key project deliverables (e.g., TDA, SAP), scheduled and budgeted engagement aligned with project milestones, task-based technical contributions, hybrid participation modalities, and systematic documentation of inputs to ensure continuity. The text also highlights that three Technical Working Groups were successfully established and actively engaged during the PPG phase, providing a proven model for sustained technical engagement. These additions ensure that participation is predictable, continuous, and directly embedded in project implementation processes, addressing concerns related to the voluntary nature of these bodies.

iii) No action taken

c) The section has been further revised and strengthened under the Institutional Arrangements section (lines 255-263), with expanded and more explicit articulation of coordination with ongoing initiatives. Previously lines 36-45 in the Theory of Change section have been removed. In addition to the document now substantively reflects coordination withkey programmes including KWSCRP, GW4R/GWIS, and UNESCO-led regional initiatives.

The revised text provides concrete details on how coordination will be operationalized in practice. This includes: (i) systematic mapping and alignment of ongoing and planned interventions during project inception; (ii) establishment of structured coordination mechanisms with implementing agencies and partners at national and transboundary levels; (iii) harmonization of technical approaches, including monitoring systems, data platforms, and groundwater assessments; and (iv) regular engagement through joint planning processes, technical working groups, and regional knowledge-sharing platforms. Furthermore, coordination with co-financed initiatives such as the Jumuiya Water Fund has been strengthened to reflect its transboundary engagement, including collaboration through its Arusha office in Tanzania, ensuring harmonized approaches to nature-based solutions, PES schemes, and community-based monitoring across the shared aquifer system. These measures ensure that KTAS builds on existing investments, avoids duplication, and maximizes complementarity and co-financing impact in line with GEF requirements.

d) The terminology has been harmonized throughout the document, and the term Project Management Unit (PMU) is now used consistently. Any previous references to the Project Coordination Unit (PCU) have 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 reasonable and achievable?

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

Secretariat comment at CEO Endorsement Request

6/02/2026:

The methodology section is brief and insufficient. Please provide a detailed methodological approach and underlying logic to justify target levels for Core and Sub-Indicators, including how 71,000 ha was estimated as sub-indicators 3.2.

10/04/2026:

Partly. The methodological basis for the 71,000 ha target under Sub-indicator 3.2 is now clearer, and the distinction between the landscape-scale target and the direct restoration area (660 ha) is appreciated. However, the following issues remain:

i) The dedicated "Methodological Approach for Core Indicators" section referenced in the response (paragraphs 300-303) does not appear in the CER, in which the numbering ends at 287. Please verify and ensure this section is included in the appropriate section.

ii) The rationale for selecting 40% of the total cloud forest area as the target threshold for Sub-indicator 3.2 has not been justified. Please explain why 40% was selected as the appropriate level of ambition.

Agency Response

We have added a new section ?Methodological Approach for Core Indicators ?paragraphs 300-303? to clearly describe how Core and Sub-Indicator targets will be calculated, in line with the GEF Core Indicator Guidelines.

The methodological approach for establishing target levels for Core and Sub-Indicators is grounded in a carefully structured framework that ensures relevance, accuracy, and alignment with established guidelines. The targets, specifically the 71,000 hectares referenced under Sub-indicator 3.2, are based on comprehensive baseline data and the spatial delineation of intervention areas. This data-driven methodology aligns with the GEF Guidelines, maintaining consistency with best practices in project design and implementation.

The project's focus on restoring existing cloud forests?rather than establishing new protected areas?emphasizes the importance of revitalizing ecosystems that are already in place. By targeting the restoration of 71,000 hectares of the total 1,775,000 hectares of cloud forest in the intervention region, the project sets a clear and achievable benchmark for measuring ecological impact. This target aligns with GEF's Integrated Water (IW) foundational projects, which enhances credibility and strategic coherence in environmental management efforts.

Furthermore, the project's collaborative objectives in promoting transboundary cooperation for the sustainable management of the Kilimanjaro aquifer will contribute to Core Indicator 7, addressing shared water ecosystems and their cooperative management. The inclusion of Core Indicator 11?estimating 100,000 beneficiaries in the aquifer region underlines the project's social dimension, with a specific focus on female beneficiaries, thus reflecting equity and inclusivity in stakeholder engagement. This methodological foundation ensures rigorous monitoring and evaluation throughout project implementation, enabling adaptive management approaches that respond to emerging challenges and opportunities.

15/05/2026

The document has been updated to address both issues raised.

(i) A dedicated ?Methodological Approach for Core Indicators? section was already included and has now been verified and aligned with the correct paragraph numbering to ensure consistency and ease of reference (now Para 267-270).

(ii) The reference to 40% was a typographical error and has been corrected to 4%, (Para 76 and 177), which corresponds to the approximately 71,000 Ha target area relative to the total estimated cloud forest extent within the intervention landscape. The rationale for the target under Sub-indicator 3.2 has been further clarified (para. 268). The revised text explains that the target of 71,000 hectares represents approximately 4% of the estimated 1,775,000 hectares of cloud forest systems within the broader intervention landscape. This proportion was selected based on the spatial delineation of priority recharge zones, feasibility of interventions within the project timeframe, and alignment with available financing and implementation capacity, rather than a uniform landscape-wide target.

The selected threshold reflects a strategic targeting approach, focusing on areas where restoration and improved management can generate the highest hydrological and ecosystem benefits, while also ensuring demonstrable and measurable results. In this context, the 4% target is considered both realistic and sufficiently ambitious, enabling the project to deliver impactful interventions and establish replicable models for scaling up beyond the project area. These revisions ensure that the methodology and target-setting approach are clearly justified, transparent, and consistent with GEF Core Indicator guidance.

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
6/02/2026:

Comments on risks will be provided in the next iteration of the review.

10/04/2026:

We note that FAO attached Environmental and Social Risk Screening checklist, ESMP, Indigenous Peoples Plan, and stakeholder engagement plan. An overall ESS risk is classified as Low. Indigenous Peoples will play critical role in the project, and it is important to ensure early engagement with Indigenous Peoples.

1) Please clarify whether the project ensures FPIC about the project design (particularly project governance mechanisms, integration of traditional and local knowledge, and priority of activities particularly in Component 1, 2, 3, and 4) by Indigenous Peoples during PPG.

2) Please clarify how the results of the consultations with Indigenous Peoples were integrated into the project during the PPG.

3) Please ensure Indigenous Peoples communities as partners in the project governance including the project steering committee.

4) Please consider integrating Indigenous Peoples governance, traditional and local knowledge, and security of tenures in the project, particularly in Component 1, 2, 3 and 4.

5) Please consider incorporating monitoring indicators related to respect Indigenous Peoples? 1) governance mechanisms, 2) traditional and local knowledge, and 3) security of tenures, and socioeconomic benefits on Indigenous Peoples in the project.

24/05/2026:

Addressed.

Agency Response
No action taken

15/05/2026

The project has been substantially revised to strengthen the integration of Indigenous Peoples (IP) across design, governance, implementation, and monitoring, in line with FAO ESS9 and GEF safeguards. The updated Indigenous Peoples Plan (IPP) (ANNEXF-2) has been incorporated in full into the main body of the document, and complementary revisions have been made to the stakeholder engagement approach and governance structure.

1) FPIC during PPG:

Free, Prior and Informed Consent (FPIC) was applied throughout the PPG phase as an iterative and continuous process across Components 1?4. Indigenous communities (including Maasai, Taita,Taveta, Chagga, and Pare groups) were engaged from project identification through national and community-level consultations, including the PPG Inception Workshop. FPIC processes ensured culturally appropriate engagement, informed participation, and the ability of communities to influence project design, governance mechanisms, integration of traditional knowledge, and prioritization of activities. These processes were operationalized through existing community-based structures such as WRUAs (Kenya) and WUAs (Tanzania).

2) Integration of consultation results:

Findings from Indigenous Peoples consultations during the PPG phase have been systematically integrated into project design. This includes: (i) prioritization of intervention areas based on community-identified water stress and ecosystem degradation; (ii) incorporation of Indigenous ecological knowledge into groundwater assessment, monitoring, and early warning systems; (iii) inclusion of livelihood priorities and gender considerations; and (iv) alignment with existing community-based governance structures and sub-catchment management plans.

3) Governance participation:

Indigenous Peoples are now explicitly positioned as partners and rights-holders within project governance. Representation is ensured at multiple levels, including WRUAs/WUAs (community level), technical and advisory structures, and participation in the Project Steering Committee (as observers). The project organogram has been updated to reflect this inclusion, ensuring visibility and institutionalization of Indigenous Peoples participation.

4) Integration of governance, traditional knowledge, and tenure:

The project has been revised to systematically integrate Indigenous governance systems, traditional and local knowledge, and tenure considerations across Components 1?4. This includes but not limited to participatory mapping of water resources, integration of Indigenous knowledge into hydrogeological assessments and early-warning systems, inclusion of culturally appropriate land and water management practices, and alignment with community-defined priorities such as land tenure security and access to water resources.

5) Monitoring indicators:

Specific indicators related to Indigenous Peoples have been incorporated into the project results framework. These include indicators on: (i) participation and representation in governance structures (e.g., WRUA/WUA leadership); (ii) uptake and integration of traditional knowledge; (iii) tenure-related and ecosystem outcomes; and (iv) socio-economic benefits, including gender-disaggregated participation. These indicators are embedded within the IPP and aligned with project-level monitoring systems.

The Indigenous Peoples Plan (IPP) has been revised and strengthened to align with the FAO and UNESCO ESS9 requirements and the GEF Principles and Guidelines for Engagement with Indigenous Peoples1, including FPIC, rights-based participation, and integration of traditional knowledge systems throughout the project cycle. The revised approach adopts a strengthened rights-based and participatory framework, ensuring that Indigenous Peoples are not only consulted through FPIC processes, but are actively engaged as partners and rights-holders in project governance, decision-making, implementation, knowledge integration, and equitable benefit-sharing throughout the project lifecycle.

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 RequestN/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
6/02/2026:

a) Yes.

Agency ResponseNo action taken

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
6/02/2026:

Please elaborate on how the project is aligned with national strategies related to MEAs (NBSAPs and NDCs).

10/04/2026:

Addressed. The updated section adequately elaborates on alignment with NDCs and NBSAPs for both Kenya and Tanzania, with sufficient country-specific detail. A minor point to flag:

i) The paragraph references cited in the agency response (310-316) do not correspond to the numbering in the updated document, where the relevant content appears at paragraphs 275-281. Please ensure paragraph references are consistent throughout the document.

24/05/2026:

Addressed.

Agency Response
We have added a new section ?Alignment with NDCs, NBSAPs and related national frameworks ? to further elaborate on alignment with national strategies related to Multilateral Environmental Agreements (MEAs), specifically Nationally Determined Contributions (NDCs) and National Biodiversity Strategies and Action Plans (NBSAPs) for both Kenya and the United Republic of Tanzania.
Expanded text (paragraphs 310-316) has been incorporated to clearly demonstrate how the project supports climate adaptation priorities (e.g., water security, drought resilience, and nature-based solutions) and biodiversity commitments (e.g., protection and restoration of recharge ecosystems and groundwater-dependent ecosystems), while strengthening governance, data systems, and inclusive participation mechanisms.

In addition, a comprehensive country-level alignment analysis has been developed and provided as Annex P-2, detailing how the project contributes to relevant national frameworks, including NDCs, NBSAPs, national climate strategies, water policies, and sectoral plans for both countries. These revisions ensure that the project?s alignment with MEAs and national priorities is clearly articulated, technically robust, and fully consistent with GEF-8 programming requirements.

15/05/2026

Thank you for the comment and for noting the alignment with NDCs and NBSAPs. We apologize for the inconsistency in paragraph numbering in the previous response. The correct references in the updated document are now reflected under paragraphs 271?283, and consistency has been verified throughout the document.

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
6/02/2026:

This information is provided in the wrong section. Kindly move it under the correct heading and explain how the project contributes to the identified target(s).

10/04/2026:

Addressed.

Agency ResponseWe moved the KM?GBF target mapping to the correct CER section and expanded the text to clearly identify the specific KM?GBF targets to which the project contributes, distinguishing primary and secondary contributions and explaining the pathways. In particular, the revised narrative links project activities to KM?GBF Target 2 (ecosystem restoration) and Target 3 (conservation and improved management of important areas) through protection and restoration of priority recharge forests and groundwater-dependent ecosystems, and to additional relevant targets (e.g., Target 8, 10 and 21) through ecosystem-based adaptation, sustainable management of production landscapes, strengthened monitoring and safeguards, and inclusive, gender-responsive stakeholder participation. The mapping is aligned with the Results Framework and annexes.

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request
6/02/2026:

Yes.

Agency ResponseNo action taken

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request
6/02/2026:

Yes.

Agency ResponseNo action taken

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request

6/02/2026:

Yes.

Agency ResponseNo action taken

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request

6/02/2026:

Comments on environemental and social safeguards will be provided in the next iteration of the review.

10/04/2026:

Yes.

Agency Response

8 Annexes

Annex A: Financing Tables

8.1 GEF Financing Table and Focal Area Elements: Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):

STAR allocation?

Secretariat comment at CEO Endorsement Request

N/A

Agency ResponseNo action taken

Focal Area allocation?

Secretariat comment at CEO Endorsement Request

6/02/2026:

Yes.

Agency ResponseNo action taken

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 RequestN/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
6/02/2026:

Yes.

Agency ResponseNo action taken
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
N/A

Agency ResponseNo action taken
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
6/02/2026:

Please submit the confirmed letter of cofinancing support from the UNESCO. Please upload it into the cofinancing table.

10/04/2026:

Addressed.

Agency ResponseWe acknowledge that this letter was omitted and we have now uploaded the UNESCO Co-financing letter.

Annex B: Endorsements

8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:
Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?

Secretariat comment at CEO Endorsement Request
6/02/2026:

LOEs were confirmed at PIF stage.

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
6/02/2026:

LOEs were confirmed at PIF stage.

Agency Response

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

Secretariat comment at CEO Endorsement Request
6/02/2026:

LOEs were confirmed at PIF stage.

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
6/02/2026:

a) Yes. Please see above comments about CIs and methodology. It isn't clear from the indicators across the project components *how* the project will restore forest areas. Is it correct that only Indicator 5 (Output 2.1.4) would measure "forets protection"?

c) Partly - please set specific sex disaggregated targets for relevant indicators.

d) Yes.

10/04/2026:

a) Partly. The question on whether Indicator 5 is the only indicator measuring forest protection has not been addressed. This appears to be the case, which seems insufficient to track progress on forest restoration across the project period. Please consider whether additional output-level indicators are needed to adequately measure forest restoration progress.

c) Addressed. Specific sex-disaggregated targets have been set across relevant indicators.

24/05/2026:

Addressed.

Agency Responsec) The Results Framework was revised, and sex-disaggregated and/or gender relevant indicators have been included when relevant.
We have also added a new paragraph (Para 414.) under Monitoring and reporting to strengthen the approach to gender-responsive monitoring. Furthermore, gender-disaggregated data collection will be systematically applied across project activities, and gender-sensitive indicators will be used to track not only participation but also meaningful engagement, capacity development, and influence in decision-making processes, ensuring alignment with GEF gender policy requirements
d) No action taken

15/05/2026
Indicator 5 has been reviewed in this context, and we agree that additional granularity is needed to adequately track forest restoration progress over the project period. While Indicator 5 captures the establishment of a functional cloud-forest protection system, it has now been complemented with additional output-level indicators to better measure implementation progress and results on the ground. Specifically, related sub-indicators have been introduced to track: (i) hectares of recharge areas (including cloud forests) under restoration and improved management (aligned with GEF Core Indicator 3); (ii) number of community-based restoration and protection initiatives implemented, including participation of Indigenous Peoples and local communities; and (iii) engagement of WRUAs/WUAs in PES schemes and catchment restoration activities.
Annex E: Project map and coordinates
8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?

Secretariat comment at CEO Endorsement Request
6/02/2026:

Under annex E, please enter the geo-referenced information (latitude and longitude) in their respective fields where the project interventions will take place.

10/04/2026:

Not addressed. The additional text is appreciated, however, please enter the geo-referenced information (location name, latitude, and longitude) in their respective fields where the project interventions will take place:

GEO LOCATION INFORMATION

The Location Name, Latitude and Longitude are required fields insofar as an Agency chooses to enter a project location under the set format. The Geo Name ID is required in instances where the location is not exact, such as in the case of a city, as opposed to the exact site of a physical infrastructure. These IDs are available on the GeoNames' geographical database containing millions of placenames and allowing to freely record new ones. The Location & Activity Description fields are optional. Project longitude and latitude must follow the Decimal Degrees WGS84 format **(e.g., for Washington DC, Latitude 38.89511 and Longitude -77.03637)** and Agencies are encouraged to use at least four decimal points for greater accuracy. Users may add as many locations as appropriate. Web mapping applications such as OpenStreetMap or GeoNames use this format. Consider using a conversion tool as needed, such as: https://coordinates-converter.com Please see the Geocoding User Guide by clicking here.

Location Name	Latitude	Longitude	Geo Name ID	Location & Activity Description

Please provide any further geo-referenced information and map where project interventions are taking place as appropriate.

288. The Kilimanjaro Transboundary Aquifer System (KTAS) spans southeastern Kenya and northeastern Tanzania, between approximately 36.5°E to 38.3°E longitude and 2.0°S to 4.5°S latitude. Key Kenyan intervention areas include Rombo and Taveta districts, while on the Tanzanian side, activities will focus within Siha, Hai, Moshi DC, Moshi MC, Meru DC, Mwanga DC, Arusha DC, and Arusha MC. The aquifer underlies critical basins such as the Pangani Basin, Internal Drainage System, and the fringes of the Athi River Basin, encompassing both upland recharge zones in the cloud forests and lowland abstraction areas, including the vicinity of Nyumba ya Mungu Dam. The map below shows the study area. We have included a map showing areas of proposed interventions provided under Annex E. These areas will be further assessed in detail during the project implementation to establish the extent and verify the types of interventions needed.

24/05/2026:

Not addressed. Under annex E, please enter the geo-referenced information (location name, latitude, and longitude) in their respective fields where the project interventions will take place.

08/06/2026:

Addressed.

Agency Response

FAO 29 May 26

We have now also included the coordinates in the appropriate section of the Portal interface including coordinates and description of five exploratory wells, proposed sites for MAR Pilots, and proposed sites for Recharge/Cloud Forest Protection in both Tanzania and Kenya.

---- ---- ---- ---

Well noted. We have provided the coordinates of the proposed areas for interventions as proposed by the countries under Annex E attached separately. We, however, note that the sites will be further carefully selected based on hydrogeological assessments, especially regarding drilling of exploratory boreholes and managed aquifer recharge sites.

15/05/2026

The geo-referenced information has now been provided in the required format, including location name, latitude, and longitude. A representative location for the Kilimanjaro Transboundary Aquifer System (KTAS) has been included, reflecting the transboundary nature of the project and covering key intervention areas across Kenya and Tanzania. The location and activity description has also been aligned with the project objective to clearly indicate the scope of interventions.

Annex G: GEF Budget template
8.8 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?
b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?
c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?

Secretariat comment at CEO Endorsement Request

6/02/28:

1. The current budget table does not align with the GEF Budget Template categories. Please use the template from page 58 of the [Guidelines on the Project Cycle] (Word format, Portrait orientation). For example, contracts should be separated into ?Contractual Services ? Individual? and ?Contractual Services ? Company,? which cannot be distinguished with the current format.

2. The costs for contracts are currently being subtotaled as consultants. This brings total personnel expenses (staff + consultants) to $5,605,910.16, accounting for 79% of the overall budget. Please remember the 25% threshold and adjust these costs, accordingly, specifying where the funds will be redirected.

3. A ?Chief Technical Advisor?, ?Project Assistant?, and ?Finance & Admin Specialist? are allocated across project components and PMC. In accordance with GEF guidelines, clear Terms of Reference (TOR) are required to substantiate the responsibilities associated with these roles. However, the only available file pertaining to the TOR cannot be accessed. Kindly upload the TOR for each of these positions.

Budget Description	Total	Component 1	Component 2	Component 3	Component 4	Component 5	Component 6 - M&E	PMC	Total
5011 Salaries professionals									
Chief Technical Advisor	848,429.50	262,890.24	117,082.24	180,996.00	270,651.52	-	-	16,809.50	848,429.50
Project Assistant	494,011.20	230,196.00	115,098.00	85,232.24	29,865.96	-	-	33,619.00	494,011.20
Subtotal professional staff	1,342,440.70	493,086.24	232,180.24	266,228.24	300,517.48	-	-	50,428.50	1,342,440.70
5012 GS Salaries									
Finance & Admin Specialist	158,678.30	56,747.52	28,373.76	28,373.76	-	28,373.76	-	16,809.50	158,678.30
SubtotalGs Salaries	158,678.30	56,747.52	28,373.76	28,373.76	-	28,373.76	-	16,809.50	158,678.30
5013 Consultants									

4. Please provide more detail on the training and workshops that are being charged to PMC.

6.1.2 Training, workshops & comms materials — stationery, printing/photocopy, flipcharts/name tags, outreach and communication materials	60,000.01							60,000.00	60,000.00	60,000.00		60,000.00

5. ?Travel incentives? is not a valid expenditure to be financed with GEF funds. Please remove this item and specify where the fund are reallocated.
6. Additionally, GEF expenditure categories require specific, detailed line items. ?misc. expenses? is not valid. Please provide detailed descriptions or remove these items and specify where the funds are reallocated.

Travel Incentives to Consultants (All project activities, costs allocated in respective outputs)	60,412.52	22,500.00	2,000.00	6,000.00	14,412.52	10,000.00	5,500.00		60,412.52	60,412.52		60,412.52
6.1.2 (Lump sum) misc. expenses	15,000.00	-	-	-	-	-	-	15,000.00	15,000.00	15,000.00		15,000.00

7. We will review the budget table again upon resubmission and provide comments as appropriate.

10/04/2026:

a) Partly. The budget template has been correctly aligned with GEF requirements and expenditure categories are now properly distinguished however, budget runs over 36 pages and there is ample opportunity to decrease its length and improve readability:

i) GEF Budget Tables are presented by cost item, not by activity or output. For example, there are multiple references under ?5013 Consultants? to a ?GIS/Data Specialist? that is linked to 1.1.1 ($10,000), 3.1.3 ($30,000), 4.1.1 ($20,000). It would appear that this is referring to a single individual consultant who will be contracted to deliver work under 3 components. This consultant should take up just one budget line, similar to the CTA. Please revise the budget table accordingly for all such instances, including for Contractual Services ? Company category.

ii) Please correctly label the M&E budget column as such and not as ?Component 6? ? per GEF Guidelines, the M&E budget is not a Component.

iii) There are two ?Total? columns which is affecting spacing; please remove the first one (second column from left).

iv) Please also consolidate the ?UNESCO? and ?FAO? columns into the ?Responsible Entity? column, as per template.

v) Please also do not use decimal places when entering numerical USD values.

b) Addressed. The restructuring of personnel costs is noted and appreciated, considering that the revised personnel envelope (salaries + individual consultants) amounts to approximately $2,257,586, representing approximately 32% of the total GEF budget and is considered sufficient.

c) Partly. TORs for the Chief Technical Advisor, Project Technical Officer, and Finance & Administration Specialist are now accessible. However, we note the following:

i) There is not a clear justification for having both a CTA (?[The CTA will] provide overall technical, strategic, and operational leadership for the KTAS Project through the PMU?) and a Project Technical Officer (?The PTO will serve as the principal technical and operational support within the Project Coordination Unit (PCU), ensuring the effective delivery of project activities across all components and both countries). The PTO will be responsible for coordinating technical implementation, overseeing data and information systems, and ensuring the quality and consistency of project outputs, including groundwater assessments, monitoring systems, and pilot demonstration activities.? The TORs for these two roles appear largely overlapping. Please consolidate these roles into a single position and indicate where in the budget the cost savings have been applied.

ii) Please clarify what type of project personnel is the Finance & Admin Specialist under ?5012 GS Salaries? category? Please use GEF Budget Table expenditure categories as per the Guidelines: Staff; Individual Consultant ? National; Individual Consultant ? International; Contractual Services ? Individual.

iii) Please also appropriately categorize the consultants under ?5013 Consultants? section of the budget as per the above referenced GEF expenditure categories for personnel ? ?Individual Consultants ? National? or ?Individual Consultants ? International.?

iv) Please comment on the 3 year contract duration specified for the project technical officer, while other staff TORs cover the full 5-year project period

v) The TOR for a Stakeholder and Public Participation Expert has been included and they're mentioned under institutional arrangements but this role does not appear as a named position in the budget table. Please clarify how this role is funded and ensure consistency between the TORs provided and the budget.

24/05/2026:

1) Under the Contracts section of the budget, there are three subsections, one of which appears (?(iii) Other contract for services?) to be a typical Contractual Services ? Company section where firms will be competitively procured to conduct the related activities. Please confirm and label these expenditures as ?Contractual Services ? Company?

2) The other two sections require further explanation and revisions to the budget. The first section labeled ?Transfer of funds to Countries? would appear to be not competitive contracts but rather that funds will be sub-granted to the two national Executing Partners, the Ministry of Sanitation and Irrigation (Kenya) and the Ministry of Water (Tanzania). Please confirm. If this is the case, please use the GEF Expenditure Category ?Subcontract to executing partner/entity? for avoidance of doubt.

In addition, the Budget Table must be clear about which Executing Partner will receive funds from UNESCO. In other words, will each ministry in Kenya and Tanzania receive $322,087 from UNESECO for ?Aquifer Assessment, Data Collection & Validation (National Execution)? or is that the total sum for the activities, with half dedicated to Kenya and the other half to Tanzania? Please clarify using a label such as ?UNESCO / MoW (Tanzania)? or ?UNESCO / MoSI (Kenya)? in the far-right column Responsible Party. Please use a new budget line for funds subgranted to each Executing Partner.

3) The other section for ?(ii) Co-executing partner JWF TNC? would also appear to be a subcontract rather than a competitive contracting scenario. Similar to the comment immediately above, please use the GEF Expenditure Category ?Subcontract to executing partner/entity? for avoidance of doubt.

4) We note the explanation regarding the PA role ? ?The Project Technical Officer role has been restructured and retitled as Project Assistant (PA) to reflect its purely operational and support function. The PA will not perform any strategic or technical oversight functions, but will instead support the day-to-day implementation of the project through administrative coordination, logistics, documentation, data compilation, and follow-up with partners under the supervision and technical oversight of the CTA.?

This explanation confirms the initial GEF assessment that the CTA and PA roles are indeed overlapping. As stated, best practice is to have a dedicated Project Manager with technical oversight proficiency, which alleviates the need for multiple roles The description of the PA duties does not support the budget allocation across all components + PMC. Please remove the budget allocations against technical components for the PA. Please indicate to which non-personnel lines the savings have been reallocated.

08/06/2026:

Addressed.

Agency Response

FAO 29 May 2026

1)
The budget lines originally included under ?(iii) Other contract for services? have now been confirmed under the labelled category ?Contractual Services ? Company.?

2)
The section labelled ?Transfer of funds to Countries? is intended to support non-competitive contractual arrangements with the two national Executing Partners: the Ministry of Sanitation and Irrigation in Kenya and the Ministry of Water in Tanzania.

For this reason, and for the avoidance of doubt, these budget lines have been recategorized under ?Subcontract to executing partner/entity,? as indicated by the GEF Secretariat.

In addition, to avoid any confusion, the total amount of USD 322,087 has been split into two separate budget lines, one for each country, labelled respectively as ?UNESCO / MoW (Tanzania)? and ?UNESCO / MoSI (Kenya).?

3)
The section starting with ?(ii) Co-executing partner JWF TNC? has been merged under the GEF Expenditure Category ?Subcontract to executing partner/entity,? for the avoidance of doubt.

4)
FAO acknowledges that the wording used in the previous response sheet may have created confusion regarding the nature of the position. In particular, the reference to ?administrative coordination, logistics, documentation, data compilation, and follow-up with partners? did not accurately reflect the Terms of Reference submitted as part of the project package on 15 May 2026.

For avoidance of doubt, the position is not an administrative or general operational support post. The position has now been retitled Transboundary Groundwater Technical Specialist (TGTS) in the budget and in the updated ToR to more accurately reflect its technical function. The updated ToR (**which was already uploaded in the portal on 15 May 2026 as part of the mandatory document for the submission**) clarifies that the TGTS will provide specialized technical support for the design, implementation and quality assurance of groundwater assessment, monitoring, data management and pilot demonstration activities under the KTAS Project. The role is required to ensure that hydrogeological data, field methodologies, monitoring protocols, pilot interventions and technical outputs are scientifically robust, comparable across Kenya and Tanzania, and aligned with the technical standards required for the preparation of the TDA, SAP and related project deliverables.

More specifically, the TGTS will support the implementation of joint groundwater assessments, groundwater monitoring systems, hydrogeological modelling and mapping, data QA/QC, groundwater information systems, field data validation, technical inputs to Thematic/Technical Working Groups, and the preparation of technical datasets, maps, evidence summaries, field notes and knowledge products.

The updated ToR also clarifies the division of responsibilities between the CTA and the TGTS. The TGTS does not exercise overall project management authority, does not supervise the PMU, does not approve budgets or workplans, does not represent the project at strategic or political level, and does not supervise consultants or contractors. These responsibilities remain with the CTA. The CTA is responsible for overall strategic direction, PMU leadership, supervision of consultants, work planning, budgeting, quality assurance, reporting, stakeholder engagement and institutional coordination.

On this basis, FAO considers that the CTA and TGTS functions are complementary and not overlapping. The CTA provides strategic leadership, technical oversight and institutional accountability, while the TGTS provides the specialized technical implementation capacity required to deliver the groundwater assessment, monitoring, data management and field-based components of the project.

FAO therefore requests that the TGTS position be retained in the budget. This position is instrumental to the effective delivery of a technically complex, transboundary groundwater project across two countries.

The revised ToR has been uploaded again for ease of reference, together with the updated budget reflecting the corrected title of the position.

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Budget actions
(a) Budget template and structure
The budget table has been fully aligned with the official GEF Budget Template (as per the Guidelines on the Project Cycle, page 58, Word format, portrait orientation).
? All expenditure categories have been corrected and clearly mapped to GEF classifications.
? Contractual Services ? Individual? and ?Contractual Services ? Company,?
o ?Contractual Services? refers exclusively to contracts issued to companies, firms, and institutions engaged for various services; and
o All individual contracts must be categorized under ?Consultants.?
? Budget lines have been simplified and, where appropriate, merged to improve clarity and consistency, in line with FAO recommendations (rows 125-126).

(b) Allocation of expenditures across Components, M&E, and PMC
Significant adjustments have been made to ensure that costs are appropriately allocated and compliant with GEF guidance:
? Personnel costs have been reduced and restructured following the correction of categorization issues.
o The revised personnel envelope is now USD 2,257,586 (~30% of total budget), reduced from the previous higher level.
o While this remains slightly above the 25% guideline, this allocation reflects the technical complexity of the project, including specialized hydrogeological assessments, transboundary coordination, and data system development.
? Reallocation of costs between PMC and Components:
o A number of technical staff costs previously charged to PMC have been reallocated under technical components, in line with their implementation roles.
o The Finance & Administration Specialist is now fully allocated under PMC, consistent with GEF requirements.
o The Transboundary Groundwater Technical Specialist (TGTS) (formerly Project Assistant) role has been revised to reflect its technical nature and aligned accordingly in the budget and TOR.
? Training and workshops under PMC (Row 115):
o The previously identified USD 60,000 has been reallocated under project components, as recommended.
o Any remaining reference to this line has been clarified to include only event-specific consumables or removed where not strictly necessary, to avoid ineligible GOE classification.
? Ineligible and unclear cost items addressed:
o The ?travel incentives? line has been removed, and funds reallocated to eligible travel cost categories.
o The ?miscellaneous expenses? line has been removed or replaced with clearly defined and justified cost items.

o Budget lines under travel and workshops have been streamlined and simplified to improve transparency and facilitate review.

c) **Terms of Reference (TORs) for key project staff**

? TORs for all key positions funded by GEF (Chief Technical Advisor, Transboundary Groundwater Technical Specialist (TGTS) , Finance & Administration Specialist) have now been:

o Uploaded in an accessible and readable format, and

o Revised for consistency with updated roles and budget allocations.

? The TORs clearly define responsibilities, deliverables, and reporting lines, ensuring compliance with GEF requirements.

15/05/2026

a) The GIS-related consultant lines have been reviewed and consolidated to align with GEF budgeting requirements. Previously, multiple GIS/Data Specialist roles were listed under different components (e.g., 1.1.1, 3.1.3, 4.1.1), which created duplication and activity-based budgeting.

These have now been restructured into two distinct roles based on function and level of expertise:

A National GIS & Data Specialist (line 22, 1.1.1) remains the same and the description has been provided to focus on data collection, digitization, and harmonization at the country level (primarily under Component 1).

An International GIS/Data Systems & MIS Expert (merged four items (3.1.3^2, 4.1.1, 5.1.1) will support advanced system architecture, data integration, spatial services, and development of decision-support tools across multiple components.

All related activities have been consolidated under these roles, and budget allocations have been aggregated accordingly into a single line15 under the international consultant?s category.

In addition, the Knowledge Management & Communication functions have been consolidated and are no longer presented as a separate national budget line. These responsibilities have been integrated and allocated under the international consultant line 19, ensuring coherent delivery of knowledge products, communication, and stakeholder engagement activities across Outputs 5.1.2 and 5.1.3.

The two M&E Specialist budget lines under Output 6.1.1 have been consolidated into a single M&E Specialist (National) position. The previous entries reflected different contracting modalities for similar functions; these have now been merged to ensure consistency with GEF cost-item budgeting requirements. The consolidated role covers results framework development, monitoring systems, data tracking, and reporting across the project, with the total budget aggregated accordingly.

Dissemination and outreach activities under Outputs 1.1.2 and 2.1.1 have been consolidated into a single budget line, as they involve similar formats and stakeholder engagement processes. This merger improves efficiency, reduces fragmentation, and provides flexibility in delivering outreach activities across project components.

Contractual services under budget line 5650 have been consolidated by the implementing entity (IGRAC, WWAP, JWF/TNC, and National Execution) and other contracts of services rather than by individual activities. This ensures reduced fragmentation while maintaining traceability to output across components.

Workshop, consultation, and outreach activities have been consolidated into three functional categories: (i) TDA and SAP consultation processes, (ii) stakeholder engagement and coordination, and (iii) training and knowledge exchange. This restructuring reduces

fragmentation, improves clarity, and enhances flexibility in delivering engagement activities across project components.
capacity building. This structure minimizes duplication, strengthens coherence, and enhances flexibility in implementation while maintaining alignment with project outputs

The budget rows, therefore, have reduced from 170 to about 115 lines.

In addition, Opening and closing workshops have been consolidated into a single budget line to reduce fragmentation and allow flexible participation of all stakeholders
Training and capacity-building activities have been streamlined into two complementary packages: (i) technical capacity building on hydrogeology, monitoring, and water resources management, and (ii) gender-responsive

ii) This column has been renamed to M&E.

iii) Well noted and action taken

iv) Well noted. We now have one column showing the responsible party as either UNESCO or FAO, accordingly. Previous columns have been deleted accordingly.

v) Well noted

b) Well noted and no action taken

c (i) The TORs have been revised to clearly distinguish the roles and eliminate any overlap.

The Chief Technical Advisor (CTA) will provide overall strategic, technical, and transboundary leadership for the project, including high-level coordination between Kenya and Tanzania, supervision of all project consultants and deliverables, quality assurance of key outputs (e.g., TDA, SAP), and coordination of partnerships with national, regional, and international stakeholders.

This distinction ensures that:
The CTA operates at a high-level, transboundary, and supervisory and technical oversight, and

The PA provides dedicated implementation support, which is essential for a multi-country project of this scale.

Given the transboundary nature of the project (Kenya and Tanzania), the PA role is critical to ensure efficient coordination, continuity of operations, and timely delivery of activities across both countries, without overloading the CTA with operational responsibilities.

Regarding the duration, the PA position has been aligned to the full 5-year project duration, under the same budget envelope. This adjustment reduces the annual cost while ensuring continuity and sustained operational support throughout the project lifecycle.

The revised TORs reflect these changes and provide clear, non-overlapping responsibilities.

The Project Technical Officer role has been restructured and retitled as Project Assistant (PA) to reflect its purely operational and support function. The PA will not perform any strategic or technical oversight functions, but will instead support the day-to-day implementation of the project through administrative coordination, logistics, documentation, data compilation, and follow-up with partners under the supervision and technical oversight of the CTA.

(ii) Finance & Admin Specialist 5012 - GS Salaries is an internal FAO Categorization. The budget line has been moved under professional staff cost.

iii) Thank you for the guidance. The budget has been revised accordingly to ensure full alignment with GEF expenditure categories for personnel under ?5013 Consultants.?

All consultants have now been clearly categorized as either ?Individual Consultants ? International? or ?Individual Consultants ? National,? based on the level of expertise required, scope of responsibilities, and availability of national capacity.

In addition, consultant roles have been consolidated by function rather than by activity or output, with activities across multiple components reflected within single budget lines. This restructuring ensures consistency with GEF cost-item budgeting requirements, improves clarity, and enhances flexibility during implementation while maintaining full traceability to project outputs.

iv) Thank you for the observation. This issue has already been addressed in the revised documentation. The duration of the Project Assistant (PA) has been aligned with the full 5-year project implementation period, consistent with the timelines of other key project personnel. The budget allocation remains the same while the overlaps with the CTA role has been removed. The TOR has been updated accordingly to ensure consistency with the overall project duration and staffing structure.

v) We appreciate this comment. The functions of the Stakeholder and Public Participation Expert have been retained in the project; however, the role is not presented as a standalone budget line following the restructuring of the budget to align with GEF cost-item requirements.

Specifically, stakeholder engagement and public participation functions have been integrated across existing consultant roles and outputs, including:

Output 1.1.3, where stakeholder mapping, socio-economic assessments, and participatory inputs to the Transboundary Diagnostic Analysis (TDA) are supported under the Gender & Social Inclusion Specialist;

Outputs 2.1.4 and 2.1.3, where community participation is embedded in recharge-area protection, restoration measures, and pilot demonstration activities;

Outputs 3.1.5 and 5.1.1, where capacity-building, stakeholder consultations, and inclusive engagement processes are implemented; and

Outputs 5.1.2 and 5.1.3, where stakeholder engagement, knowledge dissemination, and communication activities are supported under the Knowledge Management & Communication Specialist.
This consolidation ensures that stakeholder and public participation functions are mainstreamed across components rather than confined to a single role, while also improving efficiency, avoiding duplication, and providing flexibility during implementation.

The TOR reflects the full scope of these functions, which are operationalized through the above roles and corresponding budget allocations. The budget table has been revised accordingly to ensure consistency between the TORs and the funding structure.

Annex H: NGI Relevant Annexes

8.9 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.

b) Does the project provide a detailed reflow table to assess the project capacity of generating

reflows? If not, please provide comments.
c) Is the Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat comment at CEO Endorsement RequestN/A

Agency Response
Additional Annexes
9. GEFSEC DECISION

9.1.GEFSEC Recommendation
Is the project recommended for approval

Secretariat comment at CEO Endorsement Request
6/02/2026:

No. Please provide responses to the comments above. Also, please provide answers to Council member comments and to STAP under "ANNEX I: RESPONSES TO PROJECT REVIEWS":

Comment by Lucretia Landmann, Senior Policy Adviser Environmental Finance, Federal Office for the Environment FOEN International Affairs Division, SWITZERLAND, Council, made on 12/23/2024

Comment:

? Apart from facilitating dialogue between technical experts and inter-ministerial representatives of the two countries, is the scope/interest for specific peer-to-peer exchanges practical issues of mutual relevance for the respective counterparts, and even more promising for broader peer advice / twinning arrangements beyond the countries with counterparts on the continent having dealt (recently) with the same issues in similar contexts?

? How far will the Project seize the opportunity to support the development of state-of-the art technologies (e.g. on artificial recharging of groundwater, solarisation of groundwater extraction and assessment of aquifer vulnerability/replenishment using isotopes), whilst building on the international community and networks to bring the applied research to mainstream?

? Do you see a potential to build upon insights and experiences form past or continued regional/continent-wide initiatives such as AMCOW?s Pan-African Groundwater Program, UPGro, the SADC-GMI or even the IUCN-BRIDGE (not referenced to in the PIF) and if so, do you plan on exploiting it and how?

Comment by Annette Windmeisser, GEF Council Member, Head of Division on Climate Finance, BMZ (Federal Ministry for Economic Cooperation and Development), GERMANY, Council, made on 1/15/2025

Comment:

<u>Suggestions for improvements to be made during the drafting of the final project proposal:</u>

? The proposal lists Managed Aquifer Recharge (MAR) and specifically the reforestation and protection of the cloud forest as a counterweight to the planned groundwater extraction to enable a sustainable use of the resource. Germany requests the quantification of the potential recharge rates and extraction numbers for a sustainable groundwater use.

? Germany asks to mention the key drivers behind the increase in water demand next to a growing population (potentially agriculture, tourism industry, etc.) and to to consider potential measures to reduce the water usage of the region.

? Germany recommends to include how a ?heightened awareness of climate change impats on water resources? and thus, a priorization of aquifer protection but is achieved.

? Barrier IV lists the lack of modern groundwater monitoring networks and describes a fragmented outdated system not just on the basin level where the project takes place, but on a national level (Kenya and Tanzania respectively). Germany asks how the project will tie into already existing plans to modernize these networks.

? Germanys asks to stronger reflect Driver 2 (increasing demand) in the theory of change.

Comment by Yibin Xiang, Convention Secretariat, Convention on Biological Diversity (CBD) made on 3/25/2024

Comment:

? Regarding C. ALIGNMENT WITH GEF-8 PROGRAMMING STRATEGIES AND COUNTRY/REGIONAL PRIORITIES As the proposal marks significant relevance to biodiversity, please map the links with the 23 targets of the Kunming-Montreal Global Biodiversity Framework (KM-GBF), in terms of primary links and secondary links.

STAP Review:

3. Specific points to be addressed, and suggestions

? The document seems to build on some assumptions that are not verifiable; for instance, it is suggested that an institutional cooperation mecahsnim for the KTAS will build on existing frameworks between Kenya and Tanzania for surface waters, but it remains unclear if this is wanted by the countries or just a suggestion of the project team.

? The document has quite some redundancies and overlaps between different sections/information being used repeatedly and could use some streamlining.

? The document would benefit from more scientific evidence and references, including most recent ones. A considerable amount of information presented in the project rationale part is not substantiated by any sources/references, so it is not clear how reliable this information is.

? In this context, it might also be helpful to clearly identify the data and knowledge gaps that for sure exist in the region ? and determine how those might affect project design and implementation.

? The governance aspect could be expanded on. While it is clear that governance is crucial for the success of the project and the overall management of the KTAS, more engagement might be required in order to ensure that sustainable and cooperative mechanisms are established (or existing ones, such as the ones for surface water resources are effectively expanded to cover the KTAS) and are able to effectively perform their work (in terms of staff capacity, technical capacity, financial resources, etc.).

? Given the complexity of the problem and the significant need for data and information ? often of high technical complexity ? more engagement with research institutions, in the region and beyond ? is highly recommended. Such engagement could also be an important pilot for collaboration between GEF projects and academia/research beyond the specific project and therefore shared through IW:Learn, but also other, more academic platforms (e.g. relevant academic conferences).

10/04/2026: No. Please provide responses to the comments above

24/05/2026: No. Please provide responses to the comments above

08/06/2026: Yes.

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

Secretariat comment at CEO Endorsement Request

9.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	**2/6/2026**	**3/31/2026**
Additional Review (as necessary)	**4/10/2026**	
Additional Review (as necessary)	**5/24/2026**	
Additional Review (as necessary)	**6/8/2026**	
Additional Review (as necessary)		