Unlocking the groundwater potential of the Kilimanjaro Water Tower

Review PIF 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

3/20/2024
Review completed by PM

5/2/2024
Program Manager

Astrid Hillers
Focal Area

International Waters
Project Type

FSP

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Project Information / Eligibility

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

b) Is the General Project Information table correctly populated?

Secretariat's Comments
(4/8/2024)

The project information table is filled out correctly.

Cleared

Agency's CommentsN/A

2. Project Summary

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

Secretariat's Comments
governance mechanism to facilitate conjunctive use: the Transboundary groundwater governance structures being aimed at in this project run in parallel to existing mechanisms for surface water management. Integration appears to be left to SAP formulation with its its implementation not part of this project. Essentially this delays this by at least around 8 years until a possible follow on project (GEF or non-GEF and based on the preparation and implementation of the proposed project and preparation frame for a SAP implementation project).

3. the lack of sound governance of groundwater on national and local levels (quantity and quality). As above, while this project provides some training and will 'secure commitments' to reforms, these will fall under SAP implementation. Meanwhile the project will aim to increase water availability - which would be very beneficial. Yet it is essential to secure that the national and local enabling environment and coherent policies and regulations are in place to provide a sound base for the sustainable management and not simple expansion of water uses.(4/8/2024)

No, the project addresses the sustainable conjunctive use of groundwater and surface water originating in the Kilimanjaro "water tower" with a major emphasis on more sustainable use of the groundwater and enhancing water security. This is very valuable effort yet the design will need to be enhanced and impacts clearer articulated including how *water security* will be assessed at baseline and at the end of the project.

The description and design needs to be clearer on:

- a short overview of current water uses in the area of the project by country and sector (major uses of surface and groundwater) and providing an insight to where pressures are highest.

- the governance mechanism to facilitate conjunctive use including how groundwater use will be built into river basin and lake governance (such as e.g. of the Pangani basin), with e.g. the Pangani including large agricultural uses of water; as well as the governance and management of the two transboundary lakes (Chala and Jipe).

- how the project will address the lack of sound governance of groundwater on national and local levels (quantity and quality). Groundwater governance is not addressed as a barrier in the ToC and it would be valuable to see that policy coherence is more explicitly addressed addressing e.g. policy incentives for large scale agricultural production and/or water transfers versus sustainable water use and water security in the long term.

Regional (ground-)water governance and management needs to built on adequate national and local frameworks. There seems to be gap to address this in the project design. Deferring national policy and regulatory reforms entirely to SAP implementation action may lead to severe risks to water security in the interim years..

- mechanisms to work on local level on participatory and effective conjunctive use, e.g. could this be strengthening existing water user associations and other community mechanisms to regulate or allocate water (both well and surface water) on local level. Please also address the need to work with IPLCs and address farmer and herder needs.

- please build gender considerations and stakeholder participation more clearly into all components, instead of seemingly a separate component.

- it is unclear why and where and what magnitude of impact is expected from the actions on MAR and reforestation (or forest rehabilitation) and how these actions will be carried out. Furthermore, is the enabling environment in place to make these efforts sustainable ?

There seems to be an inherent assumption that the better understanding and modeling of the aquifer system in itself and state of the art monitoring systems will lead to better management and greater water security. This seems to be an overly simplified ToC. Please be clearer on the logic chain of the project design and impacts expected. The TDA and SAP will be informative and valuable with an emphasis on conjunctive use, but for a project this size there need to be tangible and sustainable impacts. Sustainability may be questionable if there is not an effort to design sustainable finance

schemes to protect the upstream recharge areas of the watersheds, including the cloud forest, and at the same time address governance and management gaps that may contribute to the overuse of water and/or degradation of watersheds.

(5/1/2024)

Previous comments:

1. a short overview of current water uses in the area of the project **by country and sector** - not addressed. Please provide in approximate (semi-)quantitative terms based on existing data and information.

2. governance mechanism to facilitate conjunctive use: the Transboundary groundwater governance structures being aimed at in this project run in parallel to existing mechanisms for surface water management. Integration appears to be left to SAP formulation with its its implementation not part of this project. Essentially this delays this by at least around 8 years until a possible follow on project (GEF or non-GEF and based on the preparation and implementation of the proposed project and preparation frame for a SAP implementation project).

3. the lack of sound governance of groundwater on national and local levels (quantity and quality). As above, while this project provides some training and will 'secure commitments' to reforms, these will fall under SAP implementation. Meanwhile the project will aim to increase water availability - which would be very beneficial. Yet it is essential to secure that the national and local enabling environment and coherent policies and regulations are in place to provide a sound base for the sustainable management and not simple expansion of water uses.

4. strengthening existing water user associations and other community mechanisms- some text was added and efforts for pilots to do so. Please assure that this is clearly anchored in the Results Framework *at endorsement*.

5. Gender and stakeholder participation - improved and addressed .

6. Previous comment (estimate magnitude of impact that is expected from the actions on MAR and reforestation (or forest rehabilitation) and how these actions will be carried out. Furthermore, is the enabling environment in place to make these efforts sustainable ?) : Not addressed. Reforestation does not tackle the drivers of deforestation and slash &burn agriculture. This needs to be addressed in the PIF and be part of the ToC.

7. Several of the general comment on assumptions, lack of sustainable finance, lack of quantified impacts and e.g. on cloud forest protection are still a concern.

(9/20/2024)

1. Previous comments have either not or not be sufficiently addressed despite a discussion with the team. The project grant is substantial and clearer impacts are needed to not only address the supply but also demand side and not delay most action to SAP implementation which risk further overuse given the large increases in demands. See previous comments (copied from previous comments above):

- There seems to be an inherent assumption that the better understanding and modeling of the aquifer system in itself and state of the art monitoring systems will lead to better management and greater water security. This seems to be an overly simplified ToC. Please be clearer on the logic chain of the project design and impacts expected. The TDA and SAP will be informative and valuable with an emphasis on conjunctive use, but for a project this size there need to be tangible and sustainable impacts.

- Sustainability may be questionable if there is not an effort to design sustainable finance schemes to protect the upstream recharge areas of the watersheds, including the cloud forest, and at the same time address governance and management gaps that may contribute to the overuse of water and/or degradation of watersheds.

- Governance mechanism to facilitate conjunctive use: the Transboundary groundwater governance structures being aimed at in this project run in parallel to existing mechanisms for surface water management. Integration appears to be left to SAP formulation with its its implementation not part of this project. Essentially this delays this by at least around 8 years until a possible follow on project (GEF or non-GEF and based on the preparation and implementation of the proposed project and preparation frame for a SAP implementation project).

-the lack of sound governance of groundwater on national and local levels (quantity and quality). As above, while this project provides some training and will 'secure commitments' to reforms, these will fall under SAP implementation. Meanwhile the project will aim to increase water availability - which would be very beneficial. Yet it is essential to secure that the national and local enabling environment and coherent policies and regulations are in place to provide a sound base for the sustainable management and not simple expansion of water uses.

- The description and design needs to be clearer on:

- how the governance mechanism to facilitate conjunctive use including how groundwater use will be built into river basin and lake governance (such as e.g. of the Pangani basin), with e.g. the Pangani including large agricultural uses of water; as well as the governance and management of the two transboundary lakes (Chala and Jipe).

- how the project will address the lack of sound governance of groundwater on national and local levels (quantity and quality). Groundwater governance is not addressed as a barrier in the ToC and it would be valuable to see that policy coherence is more explicitly addressed addressing e.g. policy incentives for large scale agricultural production and/or water transfers versus sustainable water use and water security in the long term.

Regional (ground-)water governance and management needs to built on adequate national and local frameworks. There seems to be gap to address this in the project design. Deferring national policy and regulatory reforms entirely to SAP implementation action may lead to severe risks to water security in the interim years..

2.. Please include GEBs in the project summary.

(10/18/2024)

1. None of these aspects are just briefly mentioned in the summary though an effort has been made to address the comments in the revised project design.

2. Please include GEBs (core indicators at minimum) which you are actually including below in the response to comment 1. and 2. Just please include in the project summary.

Please remember that the project summary is an important section reflecting the rationale, approach and impacts of the concept.

(10/28/2024) Comments addressed.

Agency's Comments

FAO 26 October 2024

1. The Project Summary has been consistently revised and now captures salient objectives and aspects of the proposal.

2. The GEBs have been included in the project summary.

FAO 14 October 2024

Comments #1:

To respond to the several points listed in this comment we: a) reworded Outcome 1.1 and Outcome 2.1; b) added a new output (2.1.5); and c) added indicator 6 in table B.

A detail response for each of the points follows:

Addressing supply and demand side issues:

We acknowledge the GEF's concern about addressing both supply and demand side issues. We have so far established the estimates of the water demand in both Kenya and Tanzania. We have added additional write under Barriers of the PIF:

The Pangani Basin that is majorly in Tanzania (95%) and extends to Taita-Taveta county (5%) in southeastern Kenya. So far, we have established that irrigation water demand alone is the highest in the upstream parts of the basin (Tanzania) amounting to about 400-480 MCM per year. These water demand estimates throughout the Pangani basin are underestimated. Additional information from the Mombasa Water Fund has indicated that, the current water supply from the catchment areas is at 46,500 m3/day against the total water demand of 155,840 m3/day in 2022. The future water demand projects beyond the evolving project to expand the water supply by the Water Fund indicate that Mombasa will receive water supply of 312,309 m3/day against the water demand of 317 715 m3/day, significantly reducing the current deficit. To respond to the reality of expanding water demands, during the TDA and SAP phases we will:

? Conduct a comprehensive water demand analysis for major sectors, including agriculture and urban centers, taking into account the latest data from the Mombasa Water Fund and other relevant sources

? Develop water allocation scenarios that balance economic development needs with environmental sustainability, considering the projected increase in water supply and demand

? Engage with national and local governments to promote water-efficient technologies and practices in agriculture and urban water supply, aiming to reduce the gap between supply and demand

We have also another barrier as follows (added in the PIF):

?Rapidly Expanding Water Demands: The Kilimanjaro region is experiencing significantly underestimated and rapidly growing water demands, particularly in the Pangani basin. Current water supply falls far short of total demand, with recent data revealing a substantial gap between available resources and consumption needs. This mismatch poses a critical challenge for sustainable water management and threatens long-term water security. There is an urgent need for comprehensive water demand analysis across major sectors, including agriculture and urban centers, to inform effective allocation strategies.?

We have also added a separate activity to Component 2:

Furthermore, under component 2, we have added an additional indicator and related activity as follows:

Indicator 6: Comprehensive water demand analysis completed for major sectors, including agriculture and urban centers.

Activity: A detailed water demand analysis will be conducted across major sectors (domestic, livestock, irrigation, industrial, hydropower etc., within the project area. This analysis will utilize the

latest data from the local water management authorities and water users. The data will be used to develop water demand allocation scenarios that balance economic development needs with environmental sustainability, considering the projected increase in water supply and demand. The purpose is to develop a comprehensive understanding of water demands to inform sustainable allocation strategies and address the growing gap between water supply and consumption needs in the region.

Sustainability and protection of upstream recharge areas

We take note that the sustainable management and protection of upstream recharge areas is an important consideration of this project. We have added more text under Component 4 of the PIF:

To ensure long-term sustainability and protection of critical upstream recharge areas, including the cloud forest, the project will design and pilot sustainable financing schemes. These schemes will involve:

? Developing payment for ecosystem services (PES) mechanisms to incentivize conservation efforts by local communities

? Establishing a dedicated conservation fund supported by water users and other basin-wide stakeholders

? Implementing participatory forest management programs to engage local communities in conservation efforts

? Creating guidelines for sustainable land use practices in critical recharge zones

The project will leverage on existing water funds to enhance this initiative. As a result, the project recognizes the Mombasa Water Fund (MWF) as a key partner in the implementation of the conservation and catchment protection activities. UNESCO is currently exploring strategies for collaboration with the MWF on the implementation of activities within the areas of synergies such as the catchment conservation initiatives with the indigenous communities. Furthermore, the MWF has confirmed via email the intention of providing co-financing in the form of grant/investment mobilized up to 1 million USD.

Integration of groundwater and surface water governance

We have also added the following texts in Component 2:

The project will explore initiatives to foster collaboration between different water management entities, promote a holistic approach to water resource management, and ensure that groundwater

considerations are fully integrated into existing surface water governance mechanisms. As a result, some of the activities to be implemented include:

? Establishing a joint working group comprising representatives from both groundwater and surface water management authorities

? Develop an integrated water resources management (IWRM) framework that explicitly addresses conjunctive use of surface and groundwater

? Carrying out capacity-building workshops on conjunctive water management for relevant stakeholders

? In additional, the project also acknowledges the mechanism established in the Pangani River Basin Management project that can be enhanced to include the conjunctive use of groundwater and surface water.

Addressing national and local groundwater governance

We have added an activity and an indicator to strengthen national and local groundwater governance in both countries, new text added in Component 4.

We have so far evaluated existing policies for water resource management in both countries and at this stage, we have proposed some activities aiming to strengthen national and local groundwater governance:

? Conduct a comprehensive review of existing groundwater policies and regulations in both Kenya and Tanzania, identifying gaps and inconsistencies and opportunities for improvement

? Provide technical assistance to national governments in developing or updating groundwater management policies, and strategic plans with a focus on sustainable use and conservation or establishment of environmental management plans for the project area

? Develop capacity-building programs for local authorities on effective groundwater governance and management practices

? Facilitate the integration of groundwater considerations into broader water resource management frameworks at both national and local levels

? Enhanced water security for one million people in the Kilimanjaro region

? Protection and restoration of 40, 000 hectares of cloud forest, contributing to biodiversity conservation

Comment #2

2. Revised text for Inclusion of Global Environmental Benefits (GEBs) in the project summary:

- People benefiting from GEF-financed investments disaggregated by sex (count): 100,000 (50% M and F) this is a conservative estimation of direct beneficiaries of the project. However, the proponents assess that enhancing water security in the area will indirectly benefit approx one million people in the Kilimanjaro region

- Protection and restoration of 40, 000 hectares of cloud forest, contributing to biodiversity conservation

Related explanations of the methodologies used have been added at the end of the CI table

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FAO 4 September 2024

Response to comment 1

We have added additional text to describe the water uses per sector in both Kenya and Tanzania including figures and tables as obtained from recent stakeholder engagements (see also pages 10-13 of the PIF uploaded in the roadmap of the submission).

Response to comments 2 and 3

(See revised ToC, and new text in the Components descriptions).

Conjunctive management strategies for surface and groundwater will be essential for ensuring long-term water security and climate resilience in the project region. To set the scene for the definition and systematic adoption of these strategies it is crucial to: 1) conduct a comprehensive assessment of the water resources contained in the KTAS and understand its functioning; 2) provide countries with harmonized groundwater monitoring networks and protocols, and 3) test conjunctive management practices novel to the region, and strengthen technical capacities at various levels (Components 1, 2, 3). Please note that Component 3 is entirely dedicated to enabling countries to sustainably manage their groundwater resources. Component 4 will enshrine in the SAP the countries? commitment to introduce the necessary legal and institutional reforms.

Response to comment 4

Noted - strengthening existing water user associations and other community mechanisms will be clearly anchored in the Results Framework at endorsement request stage.

Response to comment 5

Noted

Response to comment 6

(see added text in Component 2 description)

The pilot demonstrations focusing on conjunctive surface and groundwater management techniques like Managed Aquifer Recharge (MAR), Aquifer Storage and Recovery (ASR), and other nature-based solutions serve the purpose of introducing these technologies to countries at both national and local levels. The aim is to showcase the potential benefits these practices offer and to encourage the adoption of regional underground water storage and floodwater management plans that will be formulated under Component 2. By familiarizing stakeholders with these innovative approaches through practical demonstrations, the intention is to facilitate the uptake of advanced groundwater management strategies outlined in the regional plans, fostering more resilient and sustainable water management practices in the region.

Output 2.1.4: see revised description in the Project Overview and reflected in the ToC).

Response to comment 7

see text on cloud forests and MAR impacts added in the portal submission (see also at pages 23 and 24 of the PIF uploaded in the roadmap, Component 2 description).

The proponent holds the belief that the project's strong foundation rooted in country-driven approaches and the mutual agreement among countries to adopt the Transboundary Diagnostic Analysis (TDA) and Strategic Action Programme (SAP) methodology serve as key assurances for the long-term sustainability of the project outcomes.

By prioritizing country ownership and involvement in project planning and implementation, the project can align more closely with national priorities and strategies, increasing the likelihood of sustained commitment and support beyond the project's duration. Additionally, the adoption of the TDA/SAP methodology fosters a common framework and understanding among participating countries, facilitating coordinated actions and fostering cooperation in managing transboundary water resources effectively.

These elements of country-drivenness and methodological alignment are fundamental pillars that underpin the project's sustainability efforts, ensuring that the benefits and impacts of the project are not only durable but also endorsed and upheld by the participating countries for the long term.

The exemplary country drivenness of this project, and their agreement on the adoption of the TDA/SAP methodology are the best guarantees of the long-term sustainability of the project results.

Please check Annex on Tanzania Field Report for additional description.

FAO 29 April 2024

As outlined in section B, the primary objective of the project is to enhance water security, foster climate-resilient livelihoods, and promote ecosystem health in the Mt Kilimanjaro region. This will be achieved through the expanded and sustainable utilization of groundwater resources from the Kilimanjaro Transboundary Aquifer System (KTAS) located in the subsurface of substantial parts of the region. The project aims to deepen our understanding of the aquifer's functionality and potential beyond the current exploitation of shallow, unconfined groundwater. Additionally, it seeks to equip both countries with the necessary tools and capacity for the sustainable management of these resources in conjunction with surface waters.

The PIF offers a concise summary of current groundwater uses and trends (page 11). A thorough comprehensive assessment of water usage in the project area will be conducted as part of the Transboundary Diagnostic Analysis (TDA). Additional text has been added to clarify this point (page 19).

The governance of the KTAS, crucial for sustaining its groundwater resources, relies on three key elements: the countries? agreement on the aquifer's conceptual model, the establishment of a permanent transboundary consultation body, and harmonized monitoring networks. These objectives are addressed through Components 1, 3, and 4 of the project. Additionally, the establishment of conjunctive surface and groundwater management mechanisms at the national level, based on watershed frameworks, will be part of the SAP negotiations (see added text at page 21).

While inadequate groundwater governance is recognized as a barrier in the project rationale, we realize it was not appropriately reflected in the Theory of Change (ToC). Text has been adjusted accordingly.

The proponent believes that policy incentives and similar reforms primarily focused on the national level, would be better addressed as part of the Strategic Action Program (SAP).

Component 1 will develop a conceptual model of the KTAS, guiding Component 2 in assessing its groundwater potential down to commercially viable depths. Component 4 will facilitate the establishment of permanent transboundary coordination and governance bodies. The full development of KTAS resources and the enhancement of national/local groundwater management frameworks will necessarily be integral to the Strategic Action Program (SAP).

For actions at the national level, please refer to the considerations above. The significance of engaging indigenous peoples and local communities (IPLC) is deeply acknowledged and integrated into the project's design.

More specific gender considerations and description of meaningful stakeholder engagement have been further articulated across logframe and components.

An additional box has been included on page 20 to address this critical gap and provide explicit justification for these project activities and products.

The pilot demonstrations of ASR and MAR will inform the SAP negotiations and could be widely replicated in both countries. Reforesting the Cloud Forests of Kilimanjaro is critical for sustaining KTAS recharge and is of utmost importance.

The proponents strongly believe that the concrete achievements currently identified by the PIF shouldn't be underestimated or misunderstood. Currently, there is very limited understanding of the KTAS despite its critical importance in sustaining livelihoods and ecosystems. The governments of Kenya and Tanzania know this and this why they requested the support of the GEF, FAO and UNESCO to make visible the water resources available in the KTAS and work in a joint manner to sustainably manage them to increase water security for their population. The project aims to address this knowledge gap through on-the-ground surveys and deep exploratory drilling. These efforts will enable the construction of a three-dimensional conceptual model of the aquifer and confirm the presence, quality, and quantity of previously untapped groundwater resources. This will be the project?s primary tangible contribution to water security and climate resilience provided by the project.

The newly acquired and shared knowledge will establish the technical foundation for countries to monitor aquifer trends and manage its resources sustainably. Through the jointly conducted Transboundary Diagnostic Analysis (TDA) and subsequent agreement on a Strategic Action Program (SAP), complemented by the establishment of permanent transboundary coordination mechanisms, the project aims to ensure the long-term sustainability of its achievements.

3 Indicative Project Overview

3.1 a) Is the project objective presented as a concise statement and clear?
b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

Secretariat's Comments
(4/8/2024)

1. The PDO aims at the expanded sustainable utilization of groundwater. Is aiming at expanded use a sound objective given the large uses of water and extended droughts in the basin? Often more water leads to more use and does not contribute to more efficient use unless accompanied by a governance and incentive system to encourage use efficiency.

2. Please provide an idea of PDO level indicators to assess baseline and end of project success in improving water security, climate resilient livelihoods and ecosystems health. If not measured these remain anecdotal.

3. Stable isotope analysis: Please comment - maybe not here but later in the project description - on the state of knowledge of the seemingly clear connection between the Kilimanjaro aquifers and Lakes Chala and Jipe and Mzima springs.

4. TDA - please list lPLC as stakeholders given e.g. presence and needs of local tribes

5. Please define/describe what is meant by a "cloud forest protection system"

6. Please comment on the economics of pumping and maintenance of "deep" wells for local and other uses.

7. Flood management aspects (location, extend, and link to groundwater recharge potentials) need to be better substantiated in the rationale. Drought are extensive in the area but there are no maps or data provided to support the efficiency of flood water infiltration and benefits.

8. Please explain consideration in project design of the immediate and long-term distribution of costs and benefits incl. maintenance of national MAR efforts for "regional underground storage".

9. Observatory and data storage and retrieval systems: The project should assess existing shared data and information systems - incl. those put in place by the NBI and by national authorities - to take on this function before advocating to create a new and independent observatory. Long term maintenance and funding, integration into national planning and existing and WRM information and DSS systems should be factored in and integration prioritized.

10. Training: Please better articulate how training of communities by itself will lead to sustainable conjunctive management of surface and groundwater. Same for training of agency staff presumably on the modeling and monitoring tools. This seems good but not sufficient to lead to greater water security, sustainable groundwater and conjunctive management without also addressing the policy and regulatory environment and capacities.

11. Consultation body TORs - will this be embedded in mechanisms for surface water management ?

12. Stakeholder involvement: please assure that stakeholder participation is a strong effort across components and includes larger water users as well as local users of surface and groundwater in assessing water uses and defining sustainable limits.

Component 5 then appears to be more of a communications ('periodic consultations') and outreach in addition to but not to substitute participatory design across the projects components.

(5/1/2024)

1. Answer well noted and the additional water sources - if realized - will contribute to available water. Transboundary cooperation mechanisms are noted and welcome. Yet, this does not address the need to enhance the enabling policy and regulatory environment on national level. Deferring this to SAP implementation risks the success of the project.

2. The PDO indicator is noted and addresses the amount of additional water, speaking to increasing water availability, but not to measures for enhancing the sustainable utilization in both countries.

3. Noted. Addressed.

4. Addressed.

5. This remains unclear and is comprised of a variety of measures addressing symptoms and not root causes of cloud forest degradation. Are there any other initiatives and actors involved this effort could build on?

6. Addressed.

7. Yes, ASR and MAR reduce evaporation and increase infiltration, yet, no area specific information is provided at all.

8. Noted.

9. Please include the most obvious candidates and existing hydro-information systems that this could build on in the baseline. Sustainability and added value of an entirely separate system should be carefully explored.

10. The lack of efforts in this project to enhance policy and regulatory frameworks across sectors to enhance groundwater governance and conjunctive management remains a concern (incl. protecting groundwater quality).

11. Country drivenness and ownership is pre-requisite for all projects. UNESCO has been engaged in advocating the conjunctive management of surface and groundwater for decades. For the benefit of the sustainability of the resource and benefit to countries and stakeholders in the long run, UNESCO's and FAOs complementary expertise on the governance and management of conjunctive uses should be upfront and center in support of the effort - see also the descriptions of the threats to Lake Chala and Jipe in the PIF given large agricultural expansion plans. Clearly the stresses to groundwater uses rest on coherent governance and management of surface and groundwater uses.

12. Addressed.

Yet. please explain why there is a need for 600 K for consultations in a sub-area of the two countries. This appears high (even including the 1 % min. for IW:LEARN activities).

(9/20/2024)

1. Please confirm that we can assume that the first sentence is the project objective and the remained (this endeavor...) an additional explanation.

2. The project overview and outputs remain to not include the strengthening of groundwater governance, conjunctive management across sectors and policy coherence on national level w where overuses already occur and are increasing.

As discussed, deferring this to SAP implementation (i.e. 6- 8 years down the road) in the face of the substantial increases in surface and groundwater uses for agriculture and urban water supplies which are being observed is not addressing *current* gaps and needs. Impacts are seen both in terms of quantity and impacts on quality of water sources. Further, if there is a lack of sound governance and policy coherence on national level, there is no base for doing so on transboundary level.

(also supported by Barrier 5 in the Rationale of the PIF:

(v) Inadequate Groundwater Governance Frameworks: Groundwater governance frameworks in both countries are not fully equipped to address the challenges facing people and ecosystems dependent on Kilimanjaro Aquifer resources. Hydrogeological knowledge, policies, and tools for monitoring and managing this invisible resource need improvement and harmonization. Basic elements of groundwater governance, such as stakeholder participation, women's empowerment, and engagement of vulnerable communities, are in early stages of implementation despite being recognized by both governments [4].)

(10/18/2024)

Comments addressed.

During project design assure that the activities leading to achievement of indicator 12 are strengthened, including addressing policy coherence and consistent incentives towards sustainable water (surface and groundwater uses) across agriculture and urban uses.

Agency's Comments

FAO 26 October 2024

Noted with thanks. During PPG phase, in coordination with the two countries, we will strengthen as much as possible the activities related to the indicator 12 of the Project Summary (Strengthened national and local groundwater governance in both countries has been consistently revised and now captures salient objectives and aspects of the proposal).

FAO 14 October 2024

Comment #1. The objective of the project has been rephrased as follows: ?The overall objective of this project is to enhance water security, climate resilience, and ecosystem health in the Mt Kilimanjaro region

through comprehensive groundwater assessment, transboundary cooperation, and sustainable management of the Kilimanjaro Transboundary Aquifer System (KTAS)?

Comment #2. The Table B has been revised and now includes a new dedicated output 4.1.3 on strengthening national groundwater governance and conjunctive management. This ensure 100% that the **project is not** deferring this task to the SAP implementation.

FAO 4 September 2024

Response to comment 1

The project objective has been rephrased to better reflect the project?s key contributions to the sustainable utilization of groundwater resources. For reference also see new text at page 5 of the PIF uploaded in the roadmap.

Response to comment 2

The PDO indicators now include the establishment of the enabling conditions for sustainable groundwater management (see also at page 19 of the PIF uploaded in the roadmap).

Response to comment 3

Noted

Response to comment 4

Noted

Response to comment 5

Explanatory text on cloud forests degradation causes and on the project?s conservation approaches, including building on successful efforts, has been added in the portal submission (see also at pages 20 and 21 of the PIF uploaded in the roadmap). The project is building on Sustainable Land Management (SLM) initiatives in Tanzania that aims to restore highly degraded areas in Pangani Basin by up to 50% by 2032.

Response to comment 6

Noted

Response to comment 7

Explanatory text has been added in the portal submission (see also at page 22 of the PIF in pdf format uploaded in the roadmap, paragraph 2).

Response to comment 8

Noted

Response to comment 9

Text box has been added in the portal submission (see also at page 22 of the PIF uploaded in the roadmap of the submission) listing key relevant national entities representing the baseline, and . The countries? strong interest in establishing this ?transboundary ?observatory? focused on the KTAS region, bodes well for its long-term sustainability, that will be part of the SAP commitments.

Response to comment 10

The Project Description, and PDO indicators, have been refined and elaborated to emphasize the pivotal role of the project in advancing the sustainable utilization of groundwater resources in the Kilimanjaro region conjunctively with surface waters. This will be achieved through a dual-focused strategy: first, by establishing the necessary conditions for sustainable practices (Components 1, 2, and 3), and second, by spearheading cross-border consensus on needed policy and legislative reforms (Components 1 and 4).

Response to comment 11

Please see above response to comment 10

Response to comment 12
Stakeholders engagement, crucial for the project success, will require regular consultations throughout the five years duration of the project. The estimated budget allocation for these activities is of approximately $100k per year.

FAO 29 April 2024

1 - The project aims to enhance exploitable groundwater reserves by advancing understanding of the deeper resources within the KTAS. Given the current impact of water scarcity on livelihoods and ecosystem health, this is a crucial contribution to resilient livelihoods, among other benefits. Additionally, the project will facilitate transboundary cooperation and establish the necessary framework for sustainable groundwater management.

2- An indicator of PDO achievement has been added at page 18.

3. The field surveys under Component 1 will encompass hydro and gas geochemistry analysis of springs, along with stable isotope surveys of various water sources such as Mzima Springs, Chala and Jipe lakes, and springs in the Chyulu Hills. These efforts aim to discern the origins of these groundwater outcrops. They will build upon a prior survey initiated by the IAEA, which was left incomplete.

4. Done. See added text.

5. Done. See text added.

6. Expanding the water reserves in the challenging conditions of the project area, amidst a growing population and recurring droughts and floods, is indeed desirable. The project will assess the productivity of confined aquifers both within the volcanic edifice and in the surrounding plains, exploring depths economically viable for extraction (less than 500m).

7. Additional, more precise information on these aspects will be provided through the PPG, and completed as part of the TDA.
ASR and MAR reduce losses due to evaporation.

8. This will be done as part of the preparation of regional underground water storage and flood water management plans (Component 2). Not feasible at the PIF level.

9. The creation of the "Hydro-environmental Observatory" of the Kilimanjaro Water Tower was requested and agreed upon by the two beneficiary countries. Its detailed design (PPG) will of course consider and build upon existing information management systems. Text has been added.

10. Reinforcing the capacities of relevant national agencies and local communities in the project region (see Component 3) is just one of many lines of action that the project will develop to achieve the PDO of the project.

11. Most likely yes. This however will be a decision of the countries.

12. The PIF has been meticulously crafted in consultation with key institutional stakeholders, including the scientific communities of both countries. A comprehensive Stakeholder Engagement Plan will be developed during the PPG phase, taking into account engagement at transboundary, national, and local levels. For the PIF one annex with the description of the stakeholders involved in the preparation of the proposal have been included in the roadmap of the submission.

Language has been included in the description of component 5.

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

Secretariat's Comments

(4/8/2024)

1. Please include gender dimensions more explicitly across all component descriptions (already done for TDA).

2. Please ensure that gender experts, women and women?s organizations are included in key stakeholder consultations and decision-making processes, for example, in Outputs 1.1.3, 4.1.1.

3. Please ensure substantive reporting of gender-specific results in MTR and TE (Output 6.1.2).

4. When developing the GAP, ensure the engagement of gender experts, and that the activities are budgeted.

(5/1/2024)

1. This has been enhanced.

2. Addressed.

3. Please address during PPG and implementation.

4. Ditto.

(9/20/2024) Addressed.

Agency's Comments

FAO 14 October 2024
N/A

FAO 4 September 2024
Response to comment 1
Noted.

Response to comment 2
Noted.

Response to comment 3
Noted.

Response to comment 4
Noted.

FAO 29 April 2024

1. Done. Additional texts have been included in the log frame. Kindly note that a Gender Action Plan will be prepared during PPG.

2. Specific references have been included in the logframe and narrative.

3. Done.

4. Noted, this will be duly reflected in the ProDoc budget.

3.3 a) Are the components adequately funded?

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

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

Secretariat's Comments

(4/8/2024)

1. Please provide more detail on the scope (# and size in ha or $$) of the pilot activities in component 2 to match funds and impacts with what is planned.

2. Same for component 3. What e.g. is envisioned in terms of the observatory. Please provide more detail in the component description.

(5/1/2024)

1. Please base an estimate of # and ha for pilot activities (incl. reforestation and forest conservation) on approximate unit figures of related efforts based on e.g. FAO or other agency expertise. Note that estimated core indicators for project benefits are expected a PIF stage and need to be based on some estimate to support project design incl. budgeting.

3. Noted.

(9/20/2024)

PMC is proportional.

Agency's Comments

FAO 14 October 2024

N/A

FAO 4 September 2024

Response to comment 1

An estimate of the cloud forests protection expected to be achieved in terms of hectares at project completion has been added in teh portal submission (see also at page 20 and 26 of the PIF uploaded in the roadmap).

An estimate of the number of MAR pilots has been added in footnote 8.

Response to comment 3
Noted

FAO 29 April 2024

1. Component 2 receives the largest allocation of GEF funding, because it includes (i) the drilling of exploratory wells down to depths of several hundred meters, an activity is considered of the highest priority by the beneficiary countries, (ii) the demonstration of the feasibility and potentialities of ASR and MAR schemes that might contribute to expand the water resources base, and (iii) the reforestation of the cloud forests, which is crucial for ensuring the KTAS recharge. A more precise estimate of the size in terms of surface area and/or costs will only be possible during PPG. The description of the Component has been slightly revised.

2. A more detailed description of the Observatory has been added.

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

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

b) Are the key barriers and enablers identified?

Secretariat's Comments
(4/8/2024)

1. Please provide an overview of the major surface and groundwater uses and use trends in the Kilimanjaro watershed and aquifer area of the Kilimanjaro aquifer system. Please give an idea of

both the local area around Kilimanjaro as well as the impact of current and future demands on the withdrawals. How groundwater dependent is e.g. the area around Moshi and what about Arusha?

2. Further to above: What is situation for the two transboundary lakes Chala and Jipe which are mainly groundwater fed? What are major threats to these ?

3. What is magnitude of the expected impact of the loss of ice cover on the system?

4. How dependent is the Amboseli plain - mentioned in the text - on water originating from Kilimanjaro?

5. What is the impact on indigenous groups (farmers and herders) and ecosystems from extended droughts and will the project involve them and how?

6. Please provide some more quantitative information on recharge zones and connection between forest cover trends and recharge.

7. Inadequate Groundwater Governance systems in both countries are mentioned. Please expand and provide some more detail. One would expect that the project would have a role in addressing this at local, national and (not only) regional levels.

8. Lack of gender equality (barriers) - please be more specific in relation to the project scope.

9. The five components should not be outlined in the rationale section. As written the logical path and choice of interventions is not entirely clear - see also comments under review sheet 3.1 and 5. The *"robust foundation for transboundary cooperation"* the project intends to create is dependent on strengthening an enabling environment on national and local levels and sensitizing and engaging national and local authorities, communities and civil society organizations in the process. The project has great potential to do so; yet even though still at PIF stage the engagement and role of these players in the project is too unclear.

10. The engagement with national academic institutions is well noted and will contribute to long term capacity building.

11. What is the relation and engagement with relevant RBOs in both countries in the immediate watershed as well as engagement with the regional LVBC and NBI technical expertise? Sustainable management of water originating from Mt Kilimanjaro will need more integrated resource planning, including but not limited to coherent management of surface and groundwater resources and cross-sector engagement with key urban and agricultural users as well as governance and management of the upstream watershed. This would call for the formation of intersectoral committees which would also be engaged in the TDA and SAP process. Kenya and Tanzania have quite solid information and processes to build the project interventions on and inform the TDA and SAP.

12.

(5/1/2024)

1. Please address.

2. Some better outline of threats to Chala and Jipe can reasonably be done. See also previous SGP funding and other existing information.

3. Noted (though this is really scant and does not provide a vision on the magnitude that the melting ice cap has on the water sources).

4. Noted.

5. Noted, yet during PPG there needs to a clear path to involve groups in project design and implementation of activities on the ground. Consultation and participation are two different aspects and the PIF identifies the conflicts between herders and pastoralists competing for land and water.

6. Noted to be enhanced in PPG and implementation of component 1.

7. There are plenty of projects and other sources to assess the governance structures and regulatory environment in the two countries at PIF stage. This will then provide a foundation to identify and address major gaps *within* the current project gaps (within and across sectors). See previous comments on this.

8. Addressed.

9. Noted on the components. Comment on enabling environment persists.

10. (no response needed)

11.Please include formation of Intersectoral Committees and engage these across the project and not only at the end of the SAP. Please also ask to include the private sector and civil society representatives in these.

(9/20/2024)

1. Please move the reporting on the stakeholder consultations and list of people consulted from the rational/barriers to the respective section in the PIF that reports on this.

2. Ditto for collaboration with other projects and initiatives (i.e. move this to the appropriate section in the PIF).

3. What are lessons learned in the region and how are they being incorporated? Please especially elaborate on lessons on how local and indigenous communities ,incl. Masai herders and local farmers, are best included in the project design and implementation of local activities and avoiding conflicts on local levels.

4. At our last call we discussed the need to address the likelihood of high fluoride levels in the groundwater. This is not mentioned. How will users be made aware and equipped to pretreat the water during the project implementation? How will this be included in community training and pilot interventions?

5. How will the project build on the MoU between Kenya and Tanzania of the management of lakes Yipe and Chala and lessons learned (see text: *"to date, groundwater extraction is a conflicting issue at the transboundary level only in the context of the local water management problems in the transboundary Lake Chala and Lake Jipe basins. These lakes feature prominently in the irrigation and water planning of Kenya's Taveta District, which is located mainly in the downstream section of the aquifer but in the upstream section of the emanating rivers. This situation is being addressed by the Memorandum of Understanding between Kenya and Tanzania for lakes Jipe and Chala"* (see PIF ?*The Joint Transboundary Management of Lakes Chala and Jipe, and Umba River Ecosystem?, signed on February 14th , 2013, under the auspices and within the framework of the Lake Victoria Basin Commission. The MoU is expected to lead to the establishment of a Joint Cooperative Framework for the ?sustainable development and management of the ecosystems of the basins?.)?*

6. Please describe (see previous comments) how the project will respond to the reality described of expanding water demands by agriculture in the Pangani basin, surging demands by nearby urban centers in Tanzania as well as distant large uses for the city of Mombasa in Kenya. While the exploration and modeling of the aquifer will provide an improved base for its management, the national governance and policy coherence in both countries are a hindrance to balance demand and supply. This project has the chance to build this ground and - as discussed - delay for 6 - 8 years to a possible SAP implementation project adds large risks as at the same time more uses and infrastructure will come online.

(10/18/2024)

1. and 2. addressed.

3. Good to see the special consideration and lessons from indigenous groups such as the Maasai.

What are other lessons learned from related interventions that have informed the PIF design and will be further explored during PPG?

4. Comment addressed in text. Please note and follow the comment on providing budget and a clear activity that provides access to fluoride treatment during PPG given the high levels of fluoride in the area.

5. It is concerning that little of lesson learned around lakes Chala and Yipe have been identified at PIF stage. PPG needs to clearly show these and how these lessons and experience are informing the project design. See comments during PPG.

6. Addressed but please refer to comments to be addressed during PPG towards the end of the review sheet and address these before endorsement.

(10/28/2024) Comments addressed.

Agency's Comments

FAO 14 October 2024

3: We have added additional text in the PIF (component 2) acknowledging that, indigenous communities in Kenya and Tanzania, such as the Maasai, Ogiek, and Hadza, offer valuable lessons in land restoration, biodiversity conservation, and sustainable resource management. The Maasai?s coexistence with wildlife, the Ogiek?s use of plants for erosion control and water management, and the Hadza?s sustainable hunting and use of baobab trees all provide critical insights for the project?s design. These practices, alongside partnerships with initiatives like the Mombasa Water Fund, will be explored during the PPG phase to ensure culturally sensitive and sustainable environmental interventions.

4: noted with thanks

5: Added more text to the "Coordination and Cooperation with Ongoing Initiatives and Project section? with additional details on ongoing initiatives in Tanzania and Kenya and in the two lakes Chala and Yipe. As suggested by the reviewer, more details on lessons and experience learned will be provided at PPG phase.

6. noted with thanks.

FAO 14 October 2024

Comment #1. Done, moved to Section D, Stakeholder Engagement.

Comment #2. Done, moved to Section C of the PIF.

Comment #3: We expect to include the lessons learned by the MWF through the involvement of the indigenous communities, particularly the Maasai in the

catchment conservation activities in the project design. This approach will ensure that traditional ecological knowledge and sustainable practices of the Maasai are integrated into our conservation strategies, enhancing the project's effectiveness and cultural relevance (see Component 4).

Comment #4: We have included quantitative information on the occurrence of fluoride in the project area (See Project Description) To address the concern about high fluoride levels in groundwater, the project will implement a comprehensive approach to mitigate the health risks associated with high fluoride levels in groundwater and improve overall water quality in the Kilimanjaro Transboundary Aquifer region. This includes:

- Conducting a thorough assessment of fluoride levels throughout the aquifer system to identify areas of concern
- Developing and implementing a community awareness program to educate local populations about fluoride-related health risks and available water treatment options
- Incorporating fluoride removal technologies into pilot interventions for water supply systems, ensuring safer drinking water for affected communities.

The project can leverage on ongoing initiatives such as the ?A Fluoride Treatment Technology Project? being implemented within Arusha (part of Pangani Basin?.

Comment #5: Further to the above response on addressing groundwater governance at national and local levels, we will strengthen our approach by (see Component 2):

? Reviewing and incorporating lessons learned from the implementation of the MoU between Kenya and Tanzania on the management of Lakes Jipe and Chala, and from similar efforts between Kenya and other neighboring countries such as Uganda and Somalia;
? Engaging with the Lake Victoria Basin Commission to ensure alignment with regional water management strategies during the SAP phase
? Documenting and disseminating best practices from other transboundary aquifer management projects in the region such as the Nile Basin Initiative (NBI).

Comment #6: See the response to the first comment on ?Addressing supply and demand side issues?

FAO 4 September 2024

Response to Comment 1

The new text in the portal submission (see also at pages 10-13 of the PIF uploaded in the roadmap), provides additional information on the water uses which now include some quantitative data provided by the countries. It was noted from the recent consultations that the upstream of the Pangani comprise intense surface water use for irrigation activities in the flower farms and sugarcane plantations. Water-related conflicts are also reported to be more in the upstream than in the downstream. Due to lack of sufficient surface water, farming activities in the downstream rely more on the groundwater, including the communities in Kenya. Majority of the communities downstream also require for livestock due to pastoral livelihood. During the PPG phase, a thorough assessment on water situation throughout the catchment will be done to provide additional documentation of the water security.

Response to comment 2

See box added in the portal submission (see also at page 13 in the PIF uploaded in the roadmap).

Response to comment 3

Text has been added in the portal submission (see also at page 10 in the PIF uploaded in the roadmap).

Response to Comment 4

Noted

Response to Comment 5:

Text added in the portal submission (see also at pages 13 of the PIF uploaded in the roadmap), recognizing that the project can play a pivotal role in sustainable conflict management over water use by promoting inclusive and equitable resource management that integrates the needs of all stakeholders, including pastoralist communities. Additionally, building a solid Grievance Redress Mechanism along with an inclusive stakeholder engagement strategy will further ensure that the needs and concerns of all parties are addressed effectively.

Response to Comment 6

Noted

Response to comment 7

The proponent, having adopted the TDA/SAP approach recommended by GEF 8 Strategic Directions for foundational IW projects, believes that anticipating reforms on water governance structures in the two project countries prior to disposing of a full transboundary diagnostic and groundwater assessment, might jeopardize the SAP definition and approval process. Please check the Tanzania field Report for additional description on existing policies.

Response to Comment 8

Noted

Response to comment 9
See text added in the portal submission (see also at page 16 of the PIF uploaded in the roadmap).

Response to Comment 10

Noted

Response to comment 11

See text added in the portal submission (see also at page 24 of the PIF uploaded in the roadmap).

FAO 29 April 2024

1. The proponents developed an overview of the water situation in the Kilimanjaro region in cooperation with the requesting countries, to align with the maximum of 5 pages foreseen by the guidelines for GEF8 PIFs for the project rationale. However, it is duly noted that for the project document more comprehensive details will be collected, organized and presented. Moreover, comprehensive answers to some of the following questions will be provided with the initial findings of the TDA.

2. The two lakes will be object of stable isotope surveys that will establish the origin of their waters. The TDA will assess major threats, national and transboundary.

3. Please note that information on the decline of Kilimanjaro?s snow cover is provided at page 10

4. The dependency of the Amboseli lake from the KTAS will be explored as part of the project (Component 1).

5. Concerning the involvement of indigenous groups please see text at pages 14,17, 21

6. The main recharge mechanism of the KTAS has been clearly identified in the cloud forests characterizing the volcano?s upper reaches. The TDA will assess the present conditions, forested areas coverage etc.

7. An analysis of groundwater governance systems in the two countries will be part of the TDA. Based on its findings, the SAP will define the reforms that countries will commit to implement at the national and regional level.

8. Gender equality and women empowerment in the water sector are recognized as critical for the sustainable use of water resources. Additional text has been included to identify gender-related barriers and ways to overcome them. Moreover, the project will strive to reduce potential or existing barriers to meaningful engagement at all levels of project activities (Gender action plan to be developed during PPG).

9. The presence of an overview in the Project Rationale of the project?s actions aimed at overcoming the identified barriers is due to a misinterpretation of what in bullet 2 page 3 of the GEF8 PIF template. Sorry about that.

The Stakeholder analysis and related engagement, KM and gender action plans that will be developed along with the Project Document will address in detail how to strengthen the enabling environment for transboundary cooperation, analyzing in depth each stakeholder group with a stake in project activities and its outcomes in view of designing the most effective ways of securing ownership and meaningful participation. The basic principles of these envisaged actions are present in the PIF and will be appropriately developed during PPG. It is worth mentioning that the high priority and interest that the Governments of Kenya and Tanzania have placed in the development of this project, represent a promising and positive indication that stakeholder engagement will be supported and facilitated by the respective authorities at the appropriate levels, including civil society, local communities, women?s organizations, indigenous people (in full respect with national legislations and norms).

11. The PIF at page 17 recognizes the need and benefit to establish links with LVBC and other regional bodies.

The SAP negotiation, as indicated at page 21, will require the participation of inter-ministerial representatives of the two countries.

4.2 JUSTIFICATION FOR PROJECT

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

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

c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?

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

Secretariat's Comments

(4/9/2024)

The project response to urgent needs for seasonal and long-term water security on local and regional levels. Groundwater (incl. groundwater fed lakes and springs) and surface water resources supply not only the local populations but also more distant agricultural production and increasingly urban centers including distant ones such as Mombasa. The overall choice of this project is sound and has the potential to strengthen the governance and management of groundwater to supplement surface water in the region and to enhance water security.

1. Please provide some quantitative information/estimates of the soon to be disappearing ice cover on Kilimanjaro on water security in the region.

2. Please provide a comprehensive baseline of past and ongoing GEF and non-GEF/MDB and bi-lateral funded projects and initiatives that this project will build on, including relevant efforts previously supported via LDCF/SCCF and GEF STAR resources. On larger regional efforts, please also build on the DSS and related systems and capacities built in the NBI and relations to LVBC under which the MOU between Kenya and Tanzania for cooperation on the two transboundary lakes, Chala and Jipe, was established. Furthermore, both countries have capacities in the water resources, environment and forestry departments that this project can build on and for sustainability reasons these should be leveraged.

3. Please extract lessons from these baseline as well as other relevant initiatives in the region and especially to be considered in terms of sustaining on the ground efforts, including PES scheme design and more concretely the design and initial establishment of a water fund or other innovative finance to support the protection of recharge areas and livelihoods upstream.

4. Please much more clearly elaborate the expected roles of stakeholders on local and national levels, including the ministries of water resources and environment, local authorities, existing RBOs (incl in the Pangani), community groups incl. water user associations.

5. Please provide some more in depth information for the extend and underlying drivers and root causes of the decrease of the cloud forest coverage. Do the suggested measures target and alleviate the root causes and how will they be sustained? While this is at PIF stage some vision needs to be provided.

6. What are other main factors leading to the pressures on surface and groundwater resources besides the upland watershed degradation which will increase with the disappearance of snow pack and increased warming.

(5/1/2024)

1. Page 10 (or other page number in the portal) states when the ice cover is disappearing - not what is been expected as a consequence (as per any existing literature).

2. Please expand, including the DSS systems at NBI and country counterpart agencies, Kenya Met services which are extensive, more information on the WB funded groundwater efforts in the region and national projects on WRM in Kenya; as well as any multi-lateral adaptation and bilateral finance.

3. Please identify lessons from related efforts that have supported the project choice and consideration of alternative designs.

4. Noted. This will be reviewed at endorsement.

5. These are symptoms not root causes - see previous comments.

6. Noted, but he project design is not clearly enough addressing these.

(9/23/24)

The TDA/SAP approach is a flexible approach that tailors do the realities at hand. It is a means to an end of addressing root causes and barriers for tensions and/or cross sectoral and cross-border trade-offs of water demands. In this case the relations between Tanzania and Kenya are strong and while there are local problems the overall users are often quite removed from the 'water tower' and hence the involvement of national and more local players. The TDA-SAP was never designed as a single cook-book or to exclude support to urgent policy or technical reforms and investments. The exploration of the physical characterization of the project will be very valuable for future planning and may expand the supply of groundwater, but without demand side management across sectors on national level there will not be an enabling environment for either sustainable national nor transboundary management of groundwater and integrated, conjunctive governance and management of the resource.

1. The barrier of groundwater governance described is not addressed by the project and the explanation that this may hinder SAP formulation provided in the review sheet is unclear. This poses a large risk to sustainable resource use in the future.

*("(v)	Inadequate Groundwater Governance Frameworks: Groundwater governance frameworks in both countries are not fully equipped to address the challenges facing people and ecosystems dependent on Kilimanjaro Aquifer resources. Hydrogeological knowledge, policies, and tools for monitoring and managing this invisible resource need improvement and harmonization. Basic elements of groundwater governance, such as stakeholder participation, women's empowerment, and engagement of vulnerable communities, are in early stages of implementation despite being recognized by both governments [4].")*

2. The role of major irrigators/large private sector users, urban panners of major users of the resource, as well on local level the role of local herders and farmers and mechanisms to prevent local resource conflicts need to be addressed during PPG. Periodic consultation - as now mentioned - appears to leave these groups as bystanders and not active players. Please address during PPG.

(10/18/2024)

1. Please include groundwater governance and policy coherence among the barriers in the ToC and its pathways. Please keep numbering of outputs in the ToC consistent to the project overview and description (component 4).

2. Noted.

(10/28/2024) **Comments addressed.**

Agency's Comments

FAO 26 October 2024

Noted.

1. ToC revised.

Barrier added:

Under the barriers in component 4, we have added ?Fragmented groundwater governance and policy coherence complicate transboundary coordination and hinder sustainable management of the Kilimanjaro aquifer?

Numbering of outputs:

Output 2.1.5 Comprehensive water demand analysis completed for major sectors, including agriculture and urban centers was also listed as output 1.1.4 in the ToCa bd has been deleted.

Output 3.1.5 was missing in the ToC and was indicated as output number 3.2.1 in the project overview. This has been addressed

Output 5.1.2 was missing in the ToC. This has been inserted and subsequent numbering of outputs 5.1.3 and 5.1.4

FAO 14 October 2024

Comment # 1. Please refer to the new output in Table B and additional text under Component 4

Comment #2. Noted. It will be duly addressed during PPG phase.

FAO 4 September 2024

Response to comment 1

Further text has been added in teh portal submission (see also at page 10 of the PIF uploaded in the roadmap)

Response to comment 2 (and previous comment 3)

The project addresses a very specific waterbody ? the KTAS - drawing lessons from UNESCO?s recognized experience in transboundary aquifers management in Africa, and globally. Apart for those mentioned in the PIF, no other relevant initiatives have been, nor are being implemented in the KTAS region.

We acknowledge that the project does not aim to create a new Water Fund. Instead, the project will propose leveraging existing financial mechanisms, such as the Mombasa Water Fund, during the SAP negotiations. The Mombasa Water Fund already has established structures and partnerships that can be utilized to support transboundary water management efforts. UNESCO has had an initial meeting with the officials of the Mombasa Water Fund, who has expressed interest for partnerships. his approach allows for the efficient use of resources and expertise, ensuring that financial mechanisms already in place are optimized to meet the shared goals of water security, ecosystem conservation, and sustainable development in both Kenya and Tanzania (see page 26).

Response to comment 4

Noted

Response to comment 5:

The stakeholder consultations have informed that the major causes of deforestation are illegal logging and land clearance for agriculture, infrastructure development, and human settlement contribute to the loss of cloud forest cover. The project will also explore other viable interventions based on the outcomes of the PPG phase focusing on critical assessment and evaluation of leading causes of deforestation, in consideration of specific geographic contexts. New text has been added in the portal submission (see also at in pages 21- 22-23 of the PIF uploaded in the roadmap).

Response to comment 6

In the view of comment 1 above new text has been added in the portal submission (see also at page 13 of the PIF uploaded in the roadmap), that indicate intense surface water use upstream and more groundwater abstraction downstream, the Kilimanjaro region experiences multi-faceted pressures ranging from increasing water demand from population growth, irrigation expansion, environmental degradation that influence recharge to climate change impacts. The project is designed to address the impacts of the recognized drivers of water resources and environmental degradation and to mitigate the impacts of climate change. The project acknowledges the aquifer?s transboundary nature and related competing interest and will support the efforts on coordinated management of the resource.

FAO 29 April 2024

1. Please note that information on the decline of Kilimanjaro?s snow cover is provided in the portal submission (see also at page 10 of the PIF uploaded in the roadmap).

2. Additional information on ongoing/recently completed initiatives, both GEF and non-GEF, relevant to the proposed project, have been added in the baseline. The preparation of a comprehensive overview of these initiatives emphasizing complementarities and synergies that the proposed project will facilitate will be prepared at the onset of PPG.

On the MoU on Lakes Jipe and Chala new information was added in teh portal submission (also see at page 25 of the PIF uploaded in the roadmap)

3. The project will propose as part of the SAP negotiations the creation of financial mechanisms such as the Water Funds (see also at page 23 of the PIF uploaded in roadmap).

4. A Stakeholders Engagement Plan will be prepared during the Project Preparation Grant (PPG) phase, building on the collaborative efforts with all major institutional stakeholders and the science community carried out during the PIF preparation.

5. Text has been added describing the threats that the cloud forests are facing, and the protection system that the project will promote. Please also see the description of the ?drivers? at pages 10, 11, 12 of the PIF uploaded in roadmap.

5 B. Project Description

5.1 THEORY OF CHANGE

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

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

Secretariat's Comments
(4/9/2024)

1. Please revisit the ToC to provide a clearer path to the PDO. Assumptions such as countries committing to priority reforms to reverse degradation trends are at the same gaps and barriers in the logic of the project. Follows therefore that more solid governance and conjunctive management on national and local levels need to be supported by the project so that the efforts puts in place for more solid knowledge on groundwater can actually lead to sound planning and management decisions.

2. Please outline efforts to be built into the project to support sustainable finance and implementation mechanisms for initiatives and pilots such as outlined under component 2, as well as 3.

3. Please clarify if what is listed as 'intermediate state assumption' i.e. SAP implementation is past or within the project. SAP implementation in most case of IW projects is not within the initial foundational project though here this may be possible as there is substantial data and information as well as institutional and participatory engagement experience in Kenya and Tanzania for a TDA process that can be completed relatively swiftly. Yes, from the description in component 4 the impression is that certain highly anticipated SAP commitments and actions such as the design of a Water Fund (which is described in component 4) ARE part of the current project. That indeed would strongly support the ToC and path to PDO achievement.

4. The barriers in the ToC ignore the need for enhanced groundwater governance (incl. permitting, monitoring and enforcement) at national and local levels. Further, water security will require both groundwater and surface water be managed in a cohesive manner. For now there is mainly a focus on groundwater only.

5. Outcome 1: Water allocation plans for the Kilimanjaro aquifer are mentioned here, yet not detail of geographical scope, stakeholders and process expanded on anywhere else. Who would agree and/or implement these 'allocation plans" - local via WUA, regional ??. That entire paragraph is rich in ambitions but not clear if these are 'fall out' from the TDA process and are additional outputs.

6. Component 2 - please complete the component title. It stops with "... and enhancing"

7. It is unclear where the flood water management comes in. Assuming this is to capture and infiltrate flood water for groundwater recharge, please provide an estimate of size and number (in ha and/or USD/$) and criteria for siting of these infiltration basins. Same for other MAR investments.

8. Reforestation or rather natural forest restauration: please indicate planning figures for the area/ha aimed for include the respective figure in the core indicator table. Please indicate who would be anticipated to carry out these efforts (while detailed design of the implementation frameworks is part of the PPG please provide some indication based on the consultations).

9. Component 3: Please take a more comprehensive view of what besides data and information tools are needed to achieve outcomes such as :" 3.1 Countries enabled to manage sustainably the groundwater resources of the Kilimanjaro region".

10. Component 4: Please see earlier comment to clarify what is part of this project given urgent need to achieve the PDO and project sustainability and likelihood to be part of the SAP. A concept for the Mombasa water fund prepared by TNC has been shared for information purposes.

11. Component 4 - Lake Chala and Jipe and cross-border agreement: could this collaboration be nested as periodic consultative body within the two governments or as part of a transboundary RBO? Please consider together with the countries to analyze the pros and cons - including finance and sustainability - of an independent institution versus a sub-basin arrangement that can draw on existing technical and admin capacities of e.g. an RBO and REC or other.

12. Component 5: See earlier comment on embedding stakeholder participation and gender considerations across all relevant components and differentiate participation from component 5 which mainly appears to aim at outreach, awareness raising and communication and hence periodic consultations. Both are good and well needed but are different.

13. As already mentioned in the comments it needs to be clarified how the GEBs will be achieved such as enhancing water security and strengthening the management of the Kilimanjaro eco-systems. Indicators and (at endorsement) targets would aid here - incl a core indicator (in hectares) under restoration and/or hectares under improved management.

(5/1/2024)

1. ToC: The barriers in the background and rational are more comprehensive and do not match the drivers in the ToC. Comments on the need to strengthen the enabling policy and regulatory environments and relevant local allocation mechanisms remain. Please clearly differentiate the part of the ToC for THIS project from assumptions and goals for the future - such as SAP implementation.

2. Please address the question on sustainable finance and on the envisioned implementation mechanisms for initiatives and pilots.

3. The project is substantially larger in finance and at the same time not overly large in geographical scope compared to many typical TDA/SAP efforts. While there is not an expectation that the SAP is implemented within this project, some current needs and gaps are expected to be addressed within the current project. The feasibility is also supported by the solid capacity of the national ministries involved. Furthermore, sustainability and durability are clear expectations in any project and has been lagging in many foundational projects (see GEF IEO Evaluation on Water Security).

4. Deferring this to SAP implementation is too large of a delay and causing a large risk to water security.

5. Noted.

6. Addressed.

7. It is assumed that PIF budgets are based on some indicative planning figures/typical range of unit costs. Please make this transparent.

8. See above. Indicative ha figures are expected at PIF stage.

9. The answer is noted, but goes back to comments on the ToC: technical knowledge and capacity is necessary, indispensable yet not a sufficient prerequisite to achieve the stated PDO.

10. Noted. Please also note that there needs to be consideration for sustainability of efforts put in place by THIS project, while relying on SAP finance by governments and development finance in future for the commitments expressed in the SAP.

11. Noted.

12. Noted.

13. Please address at PIF stage and include indicative/PIF level targets.

(9/23/2024)

(Please note that I will not repeat earlier comments here on missing policy coherence and need for enhanced governance.)

1. Why is the SAP *implementation* an intermediate state assumption of *THIS* project?

2. If protected areas are to be established in the cloud forest, please indicate in the core sub-indicators. Furthermore, during PPG (or implementation if locations are not known prior) the ESMF will need to include compensation for the loss of legitimate uses by local communities.

3. Component 3: the overall description para has been updated to include a wider view of an enabling environment to be created, yet outputs and activities and the indicators remain the same (monitoring network & observatory and training).

4. It is unclear why there are general features of Water Funds described while there are no GEF grant contributions the Mombasa water fund by the project - which by the way is unfortunate. At upstream discussions to this PIF we had understood this would be the case.

If indeed there is no co-finance to this fund by the GEF grant, then the only sentence needed then would be "The proposed Kilimanjaro Transboundary Aquifer project will significantly benefit from the alignment with the Mombasa Water Fund, which is actively engaged in catchment conservation activities in the Chyulu Hills, a vital groundwater recharge zone supplying 30% of Mombasa's water through the Mzima Springs.." If there is a desire to describe Water Funds (even without GEF support to it) please do so either in a annex or add a short description under "cooperation and coordination with other initiatives".

(10/18/2024)

1. Please note that the figure but not the text has been revised: " The Theory of Change that underlies the project design is built on the premise that if: ....(vi) The international development assistance community continues to provide support to the countries during the SAP implementation phase."

2. - 4. Noted. and please address and substantiate collaboration with the Mombasa Water Fund before endorsement.

(10/28/2024) Comments addressed.

Agency's Comments

FAO 26 October 2024

1. The bullets point after the text ?The Theory of Change that underlies?? have been revised. The one indicating ?The international development assistance community continues to provide support to the countries during the SAP implementation phase?, has been removed.

2-4: Noted and will be fully addressed during PPG phase.

FAO 14 October 2024

Comment #1. Revised and deleted, please refer to new Theory of Change which has been completely redone to increase quality and clarity.

Comment #2. It was never the intention of the project to establish protected areas. This could be an indirect benefit that the Governments could pursue as a result of the better understating of the aquifer characteristic. The project aims is to restore the existing cloud forest not to establish new protected areas. During the PPG the Project Team will explore with the Countries the reforestation as means of compensation for the uses by local communities.

Comment #3. Addressed and revised

Comment #4: First is important to notice that the MWF is concretely engaging in the preparation of this Project as testified by several discussions held with the colleagues at the Fund. Moreover the MWP promised co-financing which is duly reported in the co-financing table of the PIF. Building on this engagement, during PPG phase when the budget will be breakdown for activities we will assess the opportunity to allocate a part of project funding to the direct support of MWF

depending on the proposed intervention and impacts on the GEBs generated by the project. Additional text has been included in the PIF to reflect this intention (see the description of Component 4).

FAO 4 September 2024

Response to comment 1

This project, as all IW projects adopting the TDA-SAP methodology, will set the foundations for action and for transboundary cooperation (IW GEB): this is reflected in the Outcomes (Sphere of Influence of the project). The ToC also includes the Assumption that will lead to the Sphere of Interest (Goal). These two parts seem to the proponent as ?clearly differentiated?.

Response to comment 2

Sustainable finance and mechanisms for SAP implementation and replication of pilots is being addressed in Component 4 (output 4.1.4).

Response to comment 3

Should the project be ? as expected - successful in substantially expanding the groundwater resource base, and in testing conjunctive surface and groundwater management and nature-based solutions, this will clearly respond to major current needs and set the stage for effective climate change adaptation strategies and environmental restoration measures. In has to be noted that over 60% of the project budget will be destined to Components 1, 2, and 3.

Response to comment 4

The revised PIF clarifies that there are no rapid policy/legislative/governance solutions for improving water security in the project region. The project expected main results ? improvements in the knowledge of the KTAS exploitable groundwater resources, in transboundary cooperation and in strategic planning and governance capacities ? will represent the indispensable foundations for sustainable long-term solutions.

Response to comment 5

Noted

Response to comment 6

Noted

Response to comment 7

It is expected that at least two ?water infiltration schemes? with a capacity of 0,5 Mm3 and likely located in the lower slopes of Mt Kilimanjaro, will be constructed at the cost of $ 0,13/m3. (see footnote 8 in both the portal submission and the PIF uploaded in the roadmap) .

Response to comment 8

A tentative estimate is provided in the core indicators table (see both the portal submission and at page 26 of the PIF uploaded in the roadmap).

Response to comment 9

Component 1 will build the knowledge, ?making the invisible visible?, while all other components will implement concrete on the ground actions, and strengthen countries? commitment and capacities to further remedial and mitigation actions.

Response to comment 10

Noted, it will be further addressed during PPG.

Response to comment 11

Noted

Response to comment 12

Noted

Response to comment 13

See the both the indicative PIF level targets are included in the portal submission and the the PIF uploaded in the roadmap.

FAO 29 April 2024

1. The project aims to lay the groundwork for enhancing water security in the Kilimanjaro region by sustainably managing and utilizing the KTAS groundwater resources, introducing innovative exploration of deep confined aquifers. To achieve this, the project follows the TDA/SAP methodology recommended by the GEF, that in the case of aquifers consists of three main steps:

? Assessment of Aquifer Characteristics: This step involves evaluating the properties and potential of the aquifer system to understand its dynamics and capabilities.

? Transboundary Diagnostic Analysis (TDA): Conducting a TDA helps identify the root causes of degradation and transboundary issues related to the aquifer system.

? Strategic Action Program (SAP): Facilitating agreement on a SAP involves developing a plan of strategic actions that the sharing countries commit to implementing to address identified challenges and enhance the sustainable management of the aquifer system.

Additionally, the project aims to equip countries with the technical tools and capacity necessary to effectively manage the groundwater resource. These key objectives are well articulated in the Theory of Change framework of the project.

2.Component 2 will focus on assessing the existence and potential of previously unexploited deeper confined aquifers. If such aquifers are found, their sustainable development will be included in the SAP. Additionally, Component 2 will demonstrate the feasibility and effectiveness of Aquifer Storage and Recovery (ASR), Managed Aquifer Recharge (MAR) nature-based solutions, and strategies to protect the Cloud Forests from further degradation. The SAP will incorporate and build upon these approaches. Component 3 will support countries in the establishment of a modern monitoring network, harmonized at the transboundary level. The countries are committed to the implementation and maintenance of the system.

3.The project aims to eliminate existing barriers that have impeded the full and sustainable utilization of groundwater resources originating from the Kilimanjaro Water Tower. Achieving the project's overarching goal of significantly enhanced water security hinges on the willingness of both countries to progress to SAP implementation, supported by the international development assistance community. The project design is predicated on the assumption that this collaboration will occur.

4. The project is primarily focused on groundwater, marking the first comprehensive, science-based endeavor to assess the hydrogeological features and development potential of the KTAS. It lays the technical groundwork for sustainable management of this transboundary resource, vital for regional water security. Additionally, necessary policy, institutional, and legislative reforms to establish governance frameworks and enable integrated surface and groundwater management will be addressed within the SAP.

5. Water allocation plans, informed by the outcomes of the TDA, are highlighted as potential strategies to be explored within the SAP, alongside conjunctive management and ASR/MAR schemes.The paragraph (page 20) has been adjusted to make this clearer.

6. Expanding groundwater resources, and enhancing groundwater storage capacity. This was reflected in the PIF.

7. Indeed, utilizing floodwaters for aquifer recharge is a key strategy for flood mitigation. However, specific details such as the number of hectares, associated costs, and siting criteria are typically beyond the scope of a PIF but will be part of a meticulous analysis during ProDoc preparation.

8. Indeed, countries have acknowledged that testing effective methods for restoring cloud forests is a significant contribution of the project to groundwater sustainability. However, as outlined in

the PIF, the quantification of the relevant Core Indicator will be properly addressed during the PPG phase.

9. Component 3 leverages the outcomes of Components 1 and 2 to assist countries in establishing a modern monitoring network, which is indispensable for effective groundwater management. Additionally, it involves the creation of a hydro-environmental Observatory of the Kilimanjaro Water Tower and the enhancement of capacity among relevant national staff.

10 Achieving the Project Development Objective (PDO) of this groundwater-focused project will necessitate the implementation of its various interconnected strategies. The establishment of Water Funds, as outlined in the PIF, will be advocated for and is anticipated to be included in the Strategic Action Program (SAP). Contacts with the Mombasa Water Fund and the Upper Tana Water Fund will be established during PPG to assess complementarities or replication potential.

11. Well noted. Component 4 will include efforts to establish a permanent Consultation Body for the Kilimanjaro Transboundary Aquifer System (KTAS) and its associated ecosystems, such as Lakes Chala and Jipe, leveraging existing agreements like the Lakes MoU. The structure of this body, whether it will be integrated within the two governments or as part of an existing river or lake basin organization like the LVBC, will be determined during the project implementation phase.

12. Well noted. See responses to above questions 8 and 4.

13. Well noted. It would be desirable to address the limitations of the current Core Indicator framework for IW projects. During the Project Preparation Grant (PPG) phase, efforts will be made to adopt indicators 3 and 4, to capture the broader environmental and social impacts of IW projects. The indicators and targets for the Project Development Objective (PDO) and outcomes will be defined before the CEO Endorsement, ensuring a robust framework for assessing project success.

5.2 INCREMENTAL/ADDITIONAL COST REASONING

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

Secretariat's Comments
(4/9/2024)

While there is no doubt this can be well described for this project, it is unclear where this section is. Please provide an indication or add this.

(5/1/2024)

Kindly expand the incremental cost reasoning and incremental role of GEF funds beyond the baseline.

(9/23/24) This is not sufficient incremental cost reasoning. Please refer to GEF guidance on incremental costs.

(10/18/24) Cleared.

Agency's Comments

FAO 14 October 2024

New text has been added at the end of the Project Rational section before going into detail with the project approach and theory of change description.

FAO 4 September 2024

Please note that the new text added in both the portal submission and on the PIF uploaded in the roadmap. The new following sentence has been added:

[...] Without GEF incremental funding countries would continue with BAU, and jeopardize water security in the region.

FAO 29 April 2024

Please note that the following sentence has been added:

Incremental costs represent the extra expenditures directly attributable to the implementation of a particular project or intervention, beyond what would have been expended in its absence. By covering these additional expenses, the GEF grant empowers countries to collaborate in ensuring the expanded and sustainable utilization of the KTAS groundwater resources.

5.3 IMPLEMENTATION FRAMEWORK

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

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

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

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

Secretariat's Comments

2. (4/9/2024)

1. See earlier comments: the institutional setting and indicative roles of UNESCO, of government agencies and of local entities needs a clearer articulation while we understand that details are part of project desing.

2. Please describe cooperation with ongoing initiatives and projects (GEF and non-GEF), including potential for co-location and/or sharing of expertise/staffing. Currently this is marked as N/A which must be a simple typo.

3. Please outline key anticipated outputs of KM&Learning and an approximate timeline.

(5/1/2024)

1. Detailed implementation arrangements are indeed subject to project design and will be reviewed at endorsement stage. We very much encourage an intermediate discussion before the submission of the ER for activities on local levels in the watershed which at this point appear to not build on any baseline efforts.

2. Noted and please expand in PPG.

3. Please address as per the GEF KM requirements.

(9/23/24)

1. Please describe an *anticipated/preliminary* arrangement of the execution arrangements which will be further explored and either validated or changed during the PPG phase. e.g. What is the anticipated role of UNESCO and the lead national agencies? Have there been discussions for options in which regional or national entity to co-locate the PMU and or national coordinator/s ?

2. Please move the earlier text on cooperation with ongoing initiatives and projects to this section.

3. Please clarify where there is a KM plan with anticipated KM products, timeline and budget indication (as per GEF guidelines and policies).

(10/18/24)

1. The PIF states N/A" om the question of " please add a short explanation to describe cooperation with ongoing initiatives and projects, including potential for co-location and/or sharing of expertise/staffing".

Clearly that neither aligns with the PIF text nor the agency responses -please address.

2. No showing on our end. Please check.

3. Noted.

(10/28/2024) Comments addressed.

Agency's Comments

FAO 26 October 2024

1. There was a short text at the end describing cooperation with ongoing initiatives (not N/A). Perhaps one of the (many) problems with the portal?

However, we took the opportunity to add new information to the section, including initiatives and projects in both countries. We understand that this also addresses comment 2.

Regarding the implementation sections, as explained, details only need to be provided in the portal if the IA (FAO) intends to play an executing role, which is not the case for this project. Regarding implementation arrangements with governments, UNESCO and others, as usual, details will be provided at the PPG stage, not at the PIF stage.

FAO 14 October 2024

Comment #1:
In line with the requirements of the project cycle, full details of the implementation arrangements will be provided at the CEO endorsement request stage. However, as a preliminary description, to be confirmed and validated **by the countries**, the following should be expected:

1. The anticipated execution arrangements for the project are as follows:
- The lead national agencies in Kenya and Tanzania are the ministers of water and GEF focal points (key persons to be confirmed during PPG phase) will likely be responsible for implementing project activities within their respective countries and ensuring alignment with national priorities.

- UNESCO is expected to play a key role in providing technical expertise and coordination support, particularly in areas related to transboundary aquifer management and capacity building.
- Discussions are ongoing regarding the location of the Project Management Unit (PMU). Options being considered include:
- Co-locating the PMU within a regional organization with experience in transboundary water management
- Establishing the PMU in one of the participating countries with a satellite office in the other
National coordinators are anticipated to be appointed in both Kenya and Tanzania to facilitate project implementation at the country level.

These arrangements will be further explored and finalized during the PPG phase, taking into account the specific needs and contexts of the project.

Comment #2: Done, see the response above to a similar comment.

Comment #3: In line with the requirements of the project cycle. costed KM plans will be presented in the CEO endorsement document.

However, as indicated in the relevant section of the PIF, the project will elaborate a KM strategy. The strategy, including KM products, timeline and budgets will be detailed at PPG as required by GEF guidance and policies.

FAO 4 September 2024

Response to comment 1

Noted.

Response to comment 2

Noted.

Response to comment 3

New text has been added in both the portal submission and in the PIF uploaded in the portal submission.

FAO 29 April 2024

1. The GEF 8 PIF guidelines stipulate that detailed Institutional Arrangements should be included in the Project Document. The lead Executing Agency has been specified in the General Project Information table, as required. The involvement of national entities will be defined during PPG

and outlined in the Project Document. See also response 13 above. Kindly note that this proposed arrangement follows the direct requests by the countries as also visible in the Annex F including the supporting letter to the project sent by Kenya and Tanzania.

2. An enhanced description of relevant ongoing initiatives is provided on page 17. Further and more descriptive information on cooperation opportunities will be provided during PPG incorporating inputs from the consultations.

3. KM&Learning has been described throughout the Project description and particular emphasis will be dedicated to producing a detailed workplan in the PPG.

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

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

Secretariat's Comments

(4/9/2024)

1. Please see earlier comment to add to core indicators - no need to repeat here. The explanation that NO estimate can be made at this point is not acceptable.

2. Please focus on Indicator 11 of DIRECT beneficiaries and reduce the number with that in mind.

(5/1/2024)

1. Please address. FAO and UNESCO should be well placed to address this.

2. Please reduce the figure to not cover all people in the basin, but a conservative estimate of direct beneficiaries.

(9/23/24)

1. Addressed.

2. CI 11: Please confirm that these #s relate to DIRECT beneficiaries of the project which will be monitored and reported on during the project (or revise). People living in the area is not a valid number of direct beneficiaries (i.e. those directly being engaged in and benefitting from the project, incl. being therefore part of project monitoring and reporting).

(10/18/24)

Addressed.

Agency's Comments
FAO 14 October 2024

Comment #2:
Kindly refer to the comment above and explanation provided at the end of Core Indicator Table, including CI11.

FAO 4 September 2024

Response to comment 1

An estimate (hectares) of the % of cloud forest impacted by the project?s restoration actions has been attempted. See Core indicators table.

The surface area for MAR/ASR schemes, or ecosystem under protection measures cannot instead be estimated, albeit tentatively, at this stage.

Response to comment 2
Done

FAO 29 April 2024

1. The proponents consider that estimating the number of hectares of cloud forests to be restored, or the land area for pilot ASR/MAR schemes, or the surface expression of the KTAS under improved management, or the hectares of groundwater-dependent ecosystems benefiting from the project, is beyond the scope of the PIF and that will be properly estimated during PPG.

2. Estimating the number of high-intensity beneficiaries when addressing the management of a large transboundary waterbody in the subsurface is complex at the PIF stage. Moreover, following GEF guidelines for river basins and similar cases, the proponents have considered the total number, including low-intensity beneficiaries as also indicated in the formulation of Indicator 11 (? People benefiting from GEF-financed investments disaggregated by sex?). During PPG, an attempt will be made to estimate high-intensity beneficiaries.

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

Secretariat's CommentsN/A

Agency's CommentsN/A

5.6 RISKs

a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?

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 screened and rated at this stage and consistent with requirements set out in SD/PL/03?

Secretariat's Comments

4/9/2024)

1. Climate: please provide a description of anticipated climate impacts on the area, on availability of water resources and mediate term likely impacts on the vegetation on Mt Kilimanjaro. We agree that the impact on the aquifer itself cannot be quantified at this point..

2. Environmental and Social: risk to the project are briefly described. What about risks BY the project e.g. via increased groundwater exploitation?

3. Political and governance: Please describe any fragile and conflict prone areas included in the project as well as mitigation measures (e.g. to avoid farmer - herder conflicts around water points which are mentioned in the project).

4. Institutional and policy - as per earlier comments please assess the functioning of local and national systems of permitting and addressing cross-sectoral trade-offs of limited water supplies. Also, innovative approaches are suggested but during PPG please also assess how to introduce and merge these with traditional and existing formal or informal institutions as well as existing extension services.

5. Financial and business models: please include an exit and sustainability strategy to enable the continuity and/or scale -up of action past project closure.

6. Please revisit and adjust risk ratings as relevant in light of above.

(5/1/2024)

1. Please address in the risk section and be as as quantitative as possible citing e.g. IPCC findings or other existing literature.

2. It has been seen over and over that water savings and provisions lead to increased uses instead of greater water security. What are mitigation measures the project will consider to counteract this.

3. Please include in the risk table incl. mitigation measures anticipated.

4. Include "governance and management" instead of only management?

5. Please revisit and outline what the design phase will address in this regard. As written the risk is more than low.

6. Noted.

(9/23/24)

1. Not addressed. Please provide a quantitative. Mitigation measures: how will this be done unless some assessment of anticipated impact is provided.

2. Environmental and Social:

- please include risk rating of the ESS screen

- monitoring does not prevent over-abstraction by itself unless there are policies and regulations in place to respond.

3. political and governance: (1) please include the assessment of governance (see PIF rationale; barrier v) and (ii) comments on local level conflict and conflict potential esp. during droughts. Governace risk seems rather moderate than low. Please reconsider risk rating (not low)

4. Please address comment on Financial and business models provided in April/24 above. Please reconsider risk rating (not low)

(10/18/24)

1. Noted but please provide solid additional detail at endorsement.

2. Noted.

3. Addressed.

4. Please address during PPG..

Agency's Comments

FAO 26 October 2024

1. Noted and will be duly addressed during PPG phase.

4. Noted and will be duly addressed during PPG phase.

FAO 14 October 2024

Comment #1:
In agreement with FAO policy a preliminary assessment was done at PIF stage and a complete analysis will be undertaken during PPG phase. A Comprehensive Climate Impact Assessment will incorporate historical data on temperature, precipitation, and extreme weather events alongside future projections. This will allow to implement Adaptive Management Strategies, including setting operational thresholds for groundwater extraction that can be adjusted as climate conditions change.

The text underlined has been added in the Risk table for easy reverence.

This is aligned with previous submission of PIF that have been approved by GEF Sec. For this reason we ask to apply the same criteria to this PIF as a matter of consistency.

Comment #2:

The Full ES Risk Screening checklist for project has been included since the first submission and it is visible/available in the roadmap of the submission. The ESS Screening checklist is low which is consistent with both the rating included in the risk table and in the ESS correspond section of the PIF.

A new text in the risk matrix has been added to take into consideration the comment on monitoring of the reviewer.

Comment #3:

A new text in the risk matrix has been added to take into consideration the comment of the reviewer. Moreover, thr political and governance risk has been set to moderate. This will be fully reassessed during PPG stage.

Comment #4:

The comment #5 of April 2024 has been addressed in detail in the first response of this review sheet under and in the PIF with the corresponded additional text. Any other financial details will be provide during PPG phase as normal because the project is at PIF stage.

FAO 4 September 2024

Response to comment 1

See text added in the and revised Risk table

Response to comment 2 and 3

See revised Risk table.

Response to comment 4

Done

Response to comment 5

See revised Risk table

Response to comment 6

Noted

FAO 29 April 2024

1. The anticipated impacts of climate change in the project area are outlined in the Project rationale Section.

2, One of the project objectives is to enhance the sustainable use of untapped groundwater resources to improve water security.

3. Conflicts between farmers and herders are addressed in the PIF as part of the future tasks for the bilateral consultation body, not as risks.

4. Acknowledged, adjustments will be made during the PPG phase.

5. Understood, revisions will be made during the PPG phase.

6. In view of the responses above we believe that the risks are adequately described in the PIF table and that more detailed analysis will be done in PPG phase when consultations and data will be produced on purpose for this task.

5.7 Qualitative assessment

a) Does the project intend to be well integrated, durable, and transformative?

b) Is there potential for innovation and scaling-up?

c) Will the project contribute to an improved alignment of national policies (policy coherence)?

Secretariat's Comments
(4/9/2024)

1. See earlier comments to enhance considerations of durability post project closure via a clearer initial outline of implementation frameworks building on existing capacities and institutions and long-term finance (incl. for transboundary cooperation and watershed/infiltration area protection)

2. Yes, there is large potential for innovation and scale-up while comments need to be addressed.

3. Please see comments to address policy coherence as well as plain strengthening the governance and management of groundwater.

(5/1/2024)

1. See earlier comments. This project is well beyond a basic TDA and SAP foundational and is requesting resources accordingly. Durability is a concern to address conceptually in the ToC at PIF stage.

2. - --

3. The comments are repeating on this issue and suggest the need for a discussion between GEFSEC and FAO. UNESCO and FAO have long worked (with the GEF and other partners) on groundwater governance and management including the strengthening of national and local policy coherence, regulatory and management frameworks. UNESCO and FAO technical expertise and experience is vast in this area and and can support countries to benefit from their expertise to design durable projects and strengthen national capacities building.

(9/23/2024)

1. No mention of plans to design a finance and exit strategy has been added in the project description in order to maintain the monitoring network and the observatory.

2.--

3. The discussions with TNC on the Water Fund are noted as well as update on the state of the Water fund in the text. Yet, comments on strengthening policy coherence with regard to groundwater governance and conjunctive management on national level have not been addressed despite our discussions.

(10/18/24)

1. . Please explain your response.

2. --

3. Addressed.

(10/28/2024) Email exchange and clarification confirmed. Comments addressed.

Agency's Comments

FAO 26 October 2024

This comment has been addressed and resolved through an email exchange (24 October) between FAO and the GEF Secretariat.
For ease reference, details on the plans to develop an exit strategy and long-term sustainable mechanisms can be found towards the end of the description of Component 4.

FAO 14 October 2024

Comment #1:
Comments on long term sustainability of the project has been responded in the first comment above, this is also visible in the correspond section of the PIF under component 4.

Comment #3:

addressed, please see comments above and related new edits in the PIF about the active involvement of the MWF in the preparation of the PIF and upcoming PPG phase.

FAO 4 September 2024

Response to comment 1

The projects aim to enhance knowledge about the aquifer system and provide decision support tools for water resource management. Involvement of local researchers at PhD and MSc levels in the project will contribute to improved technical expertise in Kenya and Tanzania on various aspects of the project. In addition, engaging stakeholders through collaborative processes throughout the project will strengthen coordinated aquifer management through capacity building and improvement of existing management structures. A comprehensive suitability strategy will be developed during the PPG phase.

Response to comment 2
Noted

Response to comment 3

UNESCO has carried out more consultations with the countries and has led to the sharing of the MoU for Lake Jipe and Chala (2013) and additional transboundary agreements between these two countries focus on Lake Victoria and the River Mara basin. This indicates the experience of the two countries working together on transboundary issues and the project further strengthen this cooperation. Additional information has been shared with UNESCO has further improved the PIF. Furthermore, FAO-UNESCO held upstream consultations with the GEFSEC that led to yielded fruitful discussions and understanding of initial comments. The meeting also facilitated a meeting with Water Funds ? TNC where the Mombasa Water Fund provided additional information on catchment management (Chyulu Hills) activities being carried out together with indigenous communities.

FAO 29 April 2024

1. The project is well integrated, durable, as are projects adopting the TDA-SAP methodology, and definitely transformative.

2. well noted

3. The project is fully aligned with the priorities of the beneficiary countries. It was meticulously developed in collaboration with the pertinent technical authorities of Kenya and Tanzania, who strongly advocated for and endorsed the submission of this PIF, recognizing its alignment with the political, technical, and social priorities of both nations. Specifically, the project addresses a critical need shared by both countries: the enhancement of water resources availability and the improvement of their management.

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

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

Secretariat's Comments
(4/9/2024)

Yes, it is overall aligned with the programming directions for GEF-8 IW.

Note: it would greatly aid to move the paragraphs on how the project will work with strengthen Kenya's WRMA and the Pangani Basin Water office into the section on 'institutional framework'..

Agency's Comments
FAO 4 September 2024

Noted

FAO 29 April 2024

Well noted.

6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors)

Secretariat's Comments
(4/9/2024) Yes.

(5/1/2024) yes, but please be brief but more explicit on how that is the case and the proposed project specifically aligns with the river basin management plans which is confirmed but not described in the PIF.

(9/24/2024) Not addressed and more detail is expected at endorsement.

(10/18/24) noted. Please address at endorsement stage.

(10/28/2024) Comments addressed.

Agency's Comments
FAO 14 October 2024

Considering that a dedicated output/activity has been included in the PIF to assess the governance policy at national level strategies and plans, we will duly tackle this issue during PPG phase to design specific activities that will be presented at CEO endorsement stage.

FAO 4 September 2024

Additional texts have been provided in both the portal submissions and at page 17-19 in the PIF uploaded in the roadmap. Not only is the project aligning with the river basin activities in Tanzania but also aligned with the East African Community (EAC) Strategic priority 3 on ?Implementing regional initiatives on watershed management?. This description is included in the PIF and also see the Annex H ?Tanzania Field Report? (see the PIF in the PIF uploaded in the roadmap).

6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e. BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat's Comments

(4/9/2024)

1. Please address - see also stakeholder comments by the CBD secretariat.

(5/1/2024)

If that is the case, then please revise the PDO, GEB section and Rio Markers.

(9/24/2024)

Please specify which of GBF target/s the project will contribute to and how.

(10/18/24) Please respond to above and to be respond to at PIF stage.

(10/28/2024) Comments addressed.

Agency's Comments

FAO 26 October 2024

This comment has been addressed and resolved through an email exchange (24 October) between FAO and the GEF Secretariat.
For ease reference, we have added a specific text in two parts of the PIF submission which have been indicated to the reviewer.

FAO 14 October 2024

A specific text on the estimated contribution to the GBF objective(s) has been added both under the CI table (as a co-benefit) and in the Global Environmental Benefits section after the description of the project components.

FAO 4 September 2024

See the text added in the portal submission and also at page 31 of the PIF uploaded in the roadmap.

Preserving ecosystems health and enhance resilience to climate change are among the expected achievement of the project, which hence will generate ?significant? benefits in terms of biodiversity, land degradation and CC, and of target 3 of the Global BD framework.

FAO 29 April 2024

The project does not aim to generate ?direct? biodiversity benefits

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments
(4/9/2024)

Yes, but please provide the PIF ESS screening template questionnaire (not just a page that says "low risk").

(5/1/2024)

Thank you.

Agency's Comments
FAO 4 September 2024

Noted with thanks

FAO 29 April 2024

The first document uploaded was the ESS certificate produced by FAO?s internal tool. For the resubmission we uploaded as mentioned above the full ESS screening template.

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

Secretariat's Comments
(4/9/2024)

Yes.

Agency's CommentsN/A

8 Annexes

Annex A: Financing Tables

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

STAR allocation?

Secretariat's CommentsNA

Agency's CommentsN/A

Focal Area allocation?

Secretariat's Comments
(4/9/2024)

1. The Agency Fee of the Project Grant and the PPG Agency Fee in Portal (US$ 675,064 and US$ 19,000 respectively) are higher than those in the Letter of Endorsement (US$ 642,500 and US$ 18,000 respectively). Please adjust the figures in Portal to match those in LoE or to get a new LoE that matches the figures in Portal.

(5/1/2024)

Addressed

Agency's Comments
FAO 4 September 2024

Noted

FAO 29 April 2024

New LoEs have been uploaded for both Kenya and Tanzania. The figures are coherent and the letter of Kenya includes the footnote right below the table with the breakdown of the GEF grant.

LDCF under the principle of equitable access?

Secretariat's CommentsNA

Agency's CommentsN/A
SCCF A (SIDS)?

Secretariat's CommentsNA

Agency's CommentsN/A
SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat's CommentsNA

Agency's CommentsN/A
Focal Area Set Aside?

Secretariat's CommentsNA

Agency's CommentsN/A

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

Secretariat's Comments(4/9/2024) yes.

Agency's CommentsN/A

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

Secretariat's Comments

(4/9/2024)

While there is no requirement for letters of co-finance at PIF stage provisions of 55 million in co-finance all as 'recurring expenditures' and 'in-kind' do beckon some additional explanation as for their indicative source and relevance to the project and alignment with GEF policies. This includes in-kind recurring expenditures from UNESCO and FAO as well as the countries.

The definition of 'recurrent expenditures' makes it hard to see how there could be 55 million USD recurrent costs provided and no investments and investment mobilized funds that align with this.

Please clarify or revise before this can be cleared for work program inclusion.

(5/1/2024)

Well noted that investment mobilized finance has been identified.

Large in-kind, recurrent expenditures still require commenting from UNESCO (6.25 million) and FAO (15.00 million) side.

(9/24/2024)

Please note that recurring costs are those that are not of technical and investment nature; specifically, this would be costs such as office costs, office operating costs, or FAO staff costs of staff contributing full or in part to this project. Would these really run in the order of magnitude of 15 million? Please note that this will need to be itemized at endorsement.

(10/18/24) Noted and please provide detail at endorsement stage.

Cleared

Agency's Comments

FAO 26 October 2024
Noted with thanks

FAO 14 October 2024

Following the reviewer's comment, we change the type of co-financing to grant/resources mobilized, with the understanding that these resources cannot be used by the proposed project to pay for staff or other activities, as they are already being used by other FAO-led projects and initiatives. These contribute directly or indirectly to the same objectives of the proposed project in the same region.

The co-financing will be duly itemized at CEP endorsement stage.

FAO 4 September 2024

As per GEF policy details on the co-financing will be provided at CEO ER stage.

However kindly note that for the amounts indicated resulted from the following considerations:

UNESCO 4.2 million USD from the related to UNESCO project with WFP. + 2.05 million for projects with WB and GAFA

FAO: a set of national project managed by the FAO regional office in Africa that runs in both countries. The amount indicated is a conservative estimation of the contribution of these project and technical assistances. Details will be provided at CEO ER stage.

FAO 29 April 2024

Additional text has been provided to illustrate a clearer distribution of co-financing including recurrent expenditures and investment mobilized.

Annex B: Endorsements

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

Secretariat's Comments(4/9/2024) yes.

Agency's CommentsN/A

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

Secretariat's Comments(4/9/2024) yes

Agency's CommentsN/A

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

Secretariat's Comments
(4/9/2024)

1. In the LOE template, Kenya removed the footnote that conditions the selection of the executing partner to the following: ?*Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate*?. Agencies were informed that LoEs ?*with modifications cannot be accepted and will be returned*?. While the removal of the footnote seems to be trivial, it is not: this footnote reduces the chances of having an executing partner that does not meet the fiduciary and procurement standards required to safely execute the project. Please get an email from the OFP accepting this footnote to be part of the LoE (this is an alternative to request a new LoE).

2. The LoEs indicate that the project will be executed by ?Ministry of Water, Sanitation and Irrigation? (Kenya), and ?Ministry of Water? (Tanzania). However, in the Portal the two executing partners (besides UNESCO, which is in both LoEs) are: ?Government of Kenya and Government of Tanzania?. Please (i) modify the executing partner in Portal, so they will match the executing partner in LoE ; or (ii) get new LoEs (the executing partner can be changed during the preparation phase).

(5/1/2024)

Addressed.

Agency's Comments
FAO 29 April 2024

New LoEs have been uploaded for both Kenya and Tanzania. The figures are coherent and the letter of Kenya includes the footnote right below the table with the breakdown of the GEF grant.

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

Secretariat's CommentsNA

Agency's CommentsN/A
Annex C: Project Location

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

Secretariat's Comments

1. (4/9/2024)

A map with geo coordinates are provided. Please liaise with the portal team on how this can be entered in the GEF geo tool.

(5/1/2024) Thank you.

Agency's Comments
FAO 29 April 2024

We confirm that we will get in touch with the portal team to enter the data in the GEF geo tool.

Annex D: Safeguards Screen and Rating

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

Secretariat's Comments

(4/9/2024) Yes, what is in FAO called the ESS screen has been uploaded but it does not in fact show the screening questionnaire. Kindly add this in the portal.

(5/1/2024)

Noted. Addressed.

Agency's Comments

FAO 29 April 2024

The full screening template for FAO?s ESS has been uploaded in the roadmap of the submission.

Annex E: Rio Markers

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

Secretariat's Comments

(4/9/2024)
Yes.

Agency's CommentsN/A

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments(4/9/2024) Yes.

Agency's CommentsN/A

Annex G: NGI Relevant Annexes

8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial

additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Commentsna

Agency's CommentsN/A

9 GEFSEC Decision

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

Secretariat's Comments
(4/9/2024) and (4/18/2024)

No, not yet. Please address the comments. Please reach out to us for any questions as a short discussion may aid and speed up the revision.

(5/1/2024) No, not yet. Please address remaining comments.

(9/24/2024) Please address comments and resubmit.

addendum (9/27/2024): GEFSEC and the FAO GEF team had another fruitful discussion and clarified the lack of a common understanding of the previous comments. With that we hope that revisions will now address the comments and looking forward to the resubmission.

(10/18/24) Please address the few remaining comments and resubmit by deadline to allow possible inclusion for the de 2014 work program.

(10/28/2024) The comments have been addressed and the project is technically (and PPO) cleared and recommended for a future work program.

Agency's Comments
FAO 26 October 24

Comments addressed for GEF SEC's consideration of including this PIF in the December 2024 work program. Thank you

FAO 14 October 24

All comments are in accordance with the discussion held with the GEF SEC Task Manager (Astrid Hiller) at the end of September 2024.

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

Secretariat's Comments

1. Please check stakeholder comments before submitting the ER - incl. but not limited to those by STAP. Council members, and the CBD secretariat.

2.Fluoride: Please provide detail and **budget** how the project will address treatment of the likely natural fluoride contamination of the groundwater and provide means of treatment by users to avoid health concerns. You may want to consider cooperation with UNICEF on the rural water supply side of these aspects. **Budget needs to be provided and an activity added** to allow for access to treatment, e.g. via upscaling of the nano-membrane technology being piloted via UNESCO in Arusha as well as household level treatment for rural users.

3. During project design assure that the activities leading to achievement of indicator 12 are strengthened and made more explicit and accountable, including addressing policy coherence and consistent incentives towards sustainable water (surface and groundwater uses) across agriculture and urban uses.

4. It is of concern that very few lesson learned have been identified at PIF stage. PPG needs to clearly show these and how these lessons and experiences in the region are informing the project design. These include lessons from related projects in Tanzania and Kenya, including on successes and challenges to address the needs and include IPLCs in the project.

5. The role of major irrigators/large private sector users, urban panners of major users of the resource, as well on local level the role of local herders and farmers and mechanisms to prevent local resource conflicts need to be addressed during PPG. Periodic consultation - as now mentioned - appears to leave these groups as bystanders and not active players. Please address during PPG.

Agency's Comments

FAO 26 October 2024

We duly take note of this reminder. We will address these comments during PPG before submitting the CEO ER.

FAO 29 April 2024

We take note of this reminder, we will address these comments during PPG before submitting the CEO ER.

Review Dates

	PIF Review	Agency Response
First Review	**4/9/2024**	
Additional Review (as necessary)	**5/1/2024**	
Additional Review (as necessary)	**9/23/2024**	
Additional Review (as necessary)	**10/18/2024**	
Additional Review (as necessary)		