

# Enabling the Federal Republic of Nigeria to Prepare Its First Biennial Transparency Report (BTR1) and combined Second Biennial Transparency and Fourth National Communication (BTR2/NC4) report to the UNFCCC

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10795

**Countries**

Nigeria

**Project Name**

Enabling the Federal Republic of Nigeria to Prepare Its First Biennial Transparency Report (BTR1) and combined Second Biennial Transparency and Fourth National Communication (BTR2/NC4) report to the UNFCCC

**Agencies**

UNDP

**Date received by PM**

8/13/2022

**Review completed by PM**

11/9/2022

**Program Manager**

Remy Ruat

**Focal Area**

Climate Change

**Project Type**

EA

**Non-Expedited Enabling Activity req (PIF)**

**Non-Expedited Enabling Activity req (CEO)**

**Part 1: Project Information**

**Focal area elements**

**Is the enabling activity aligned with the relevant GEF focal area elements as indicated in Table A and as defined by the GEF 7 Programming Directions?**

Secretariat comment at CEO Endorsement Request

Cleared

August 31 2022 (RR):

Yes.

Agency Response

**Project description summary**

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

Secretariat comment at CEO Endorsement Request

Cleared

November 9 2022(RR):

Thank you for the revisions.

October 24 2022(RR):

1. and 2. This is noted, thank you for the confirmation - cleared.

3. Thank you for the updated references and documentation. While amended co-financing letter and endorsement letter now match the updated scope, this new title does not match the title used in the portal that still reads as "Enabling the Federal Republic of Nigeria to Prepare Its Fourth National Communication (4NC) and First Biennial Transparency Report (BTR1) to the UNFCCC".

Please update the title on the portal as well - in case of IT-related complication for this update, please reach out to the Secretariat.

4. Thank you for the further exploration of related initiatives, policies and plans and added details in particular in terms of synergies with the CBIT. Some timelines/partners of identified initiatives can be updated (for example, the LEDSDDP initiative is currently ongoing) - similarly, in consistency with the update provided regarding the CBIT support, please indicate 'TBC' for the related agency partner.

5. This is noted with appreciation - cleared

6. and 7. Thank you for the additional details regarding the project timeline and expected synergies and efficiency expected through the shift in publication date - cleared.

8. Thank you for the more detailed identification of covid19 risk mitigation measures - cleared.

August 31 2022 (RR):

1. A change of scope is noted : the project now includes first the preparation of BTR1 followed by NC4 which is combined with BTR2. The justification provided, in addition to delays accumulated in project preparation, is that two years would be too short to complete activities for NC4.

2. The bundling of several BTR and NC activities, as proposed in this new version, is welcome and considered a suitable structure. It is to be noted that the GEF would then expect all costs related to the preparation of BTR2 to be covered with the present financing.

3. Such change of scope is not reflected in the title as well as in the endorsement request and co-financing letters. There are several occurrences throughout the CEO approval request and annexes where the adjustment has not been made to reflect this change. An update would be welcome.

4. Identification of other related initiatives is less comprehensive than at PIF stage and several activities that are planned, recently concluded or still ongoing with regards to transparency, long term pathways and NDC related support disappeared or are not mentioned - as in the case for example of the partnership with 2050 Pathways platform identified in the PIF, and the ongoing one with AFD and IDDRI on deep decarbonization pathways (<https://climatechange.gov.ng/2021/12/14/project-launch-of-the-deep-decarbonization-projectddp/>). Furthermore, CBIT project 10809 (Strengthening the capacity of institutions in Nigeria to implement the transparency requirements of the Paris Agreement) is not referred to although sharing several objectives, partners and project executing partner. Concerns of duplication of work and impact on project effectiveness would call for updates on this point.

5. The document mentions that a new NDC was expected, mentions that it was submitted, but does not reflect its content and implications on the project apart from noting that it is expected to change the context. The updated NDC and its implications are not listed in the list of policy and legislations nor in the dedicated section. Reference can be made to CBIT project 10809 (Strengthening the capacity of institutions in Nigeria to implement the transparency requirements of the Paris Agreement) on options to articulate the description with the revised NDC.

6. Capacity development remains at the core of the approach with a clear counterpart identified at PEE level and gaps identified drawn from the last BUR process. Activities are mainstreamed throughout the project description. However, such activities present overlaps with the aforementioned CBIT Project 10809 which are not identified and addressed in this document (including regarding the harnessing of potential synergies). This would be useful in particular since both project share the same PEE, the DCC under the Federal Ministry of Environment.

7. As suggested at PIF stage, the outputs and related activities cover both the BTR and the NC in a clear way, although the NC work is now systematically associated with the BTR2 due to the change of scope. At PIF stage, 3 years were anticipated for the preparation of the NC which would lead to an expected publication in 2025. Further clarification would be welcome on why a delay until 2026 is preferred.

8. While outlined in the UNDP project document annex, the covid-19 risks and related mitigation measures could be reflected in more details throughout the CEO approval request, as identified at PIF stage.

### Agency Response

**9 November 2022:**

3. The title of the project is revised by engaging with the GEF IT Team.

4. The adjustments are now made in the CEO ER document in the relevant section: PART II: ENABLING ACTIVITY JUSTIFICATION. A. ENABLING ACTIVITY BACKGROUND AND CONTEXT. Please see the text and the table provided.

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(Previous responses)

2. Thanks to the GEF for the appreciation. Yes. All costs related to the preparation of the BTR1 and combined BTR2/NC4 will be covered under the present financing

3. All documents pertaining to the project have been updated to reflect the title in the CEO ER document, "Enabling the Federal Republic of Nigeria to Prepare Its First Biennial Transparency Report (BTR1) and combined Second Biennial Transparency and Fourth National Communication (BTR2/NC4) report to the UNFCCC". Updated versions of the Endorsement and Co-finance letters are submitted.

4. Thanks for the GEF comment. The plans, policies and initiatives which appeared in the PIF have been reinstated in the CEO ER document. Additional plans, policies and initiatives have been added in the CEO ER document (Part II Section A ? Tables 1 and 4). Also, the CBIT project PIF was not available at the time of the CEO-ER document preparation. It is now referred in the CEO ER document (Part II Section A Table 4).

5. Thanks for the GEF comment. The updated NDC has been included in the CEO ER document (Part II Section A ? Table 1). Also, reference was made to the CBIT Project in various section of the project document. UNDP is that the GEF agency for the CBIT project has withdrawn and there are ongoing negotiations by the government to find another GEF Agency to implement.

6. Thanks for the GEF comment. PART II: Section A. ENABLING ACTIVITY BACKGROUND AND CONTEXT has been revised to describe the synergy between this project and the forthcoming CBIT project. Under Table 4, it is also indicated that the Department of Forestry is the PEE of the CBIT project whereas the PEE for this project is the Department of Climate Change. Both departments fall under the Federal Ministry of Environment. Item 4 of responses to additional comments from the GEF review Sheet of Annex 13 has been amended to explain how overlaps and duplication will be avoided.

7.Thanks for the GEF comment. The CEO ER document has been revised to provide further clarifications in Table 5. Changes brought from PIM to CEO ER document

8. Thanks for the GEF comment. The information presented in the PIF is now reinstated in the CEO ER document under PART II: Section A. ENABLING ACTIVITY BACKGROUND AND CONTEXT. More details on the COVID-19 risks and related mitigation measures are provided under Part II Section B. ENABLING ACTIVITY GOALS, OBJECTIVES, AND ACTIVITIES, Item: stakeholder engagement and Part II; and Section C. DESCRIBE THE ENABLING ACTIVITY AND INSTITUTIONAL FRAMEWORK FOR PROJECT IMPLEMENTATION, Item: Institutional Arrangements.

### **Co-financing**

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

Secretariat comment at CEO Endorsement Request

Cleared

November 9 2022 (RR):

Thank you for the revisions.

October 24 2022(RR):

Thank you for the added clarification.

Regarding the UNDP co-financing which was cancelled due to the evolution in context during project design, the reference was deleted from the co-financing table in section I.C. In order to ensure consistency, the reference should also be deleted from the description of investment mobilized, as a co-financing can not be reported without a co-financing letter attached.

August 31 2022 (RR):

A description of changes from PIF is included with total co-financing amount reduced by 15% due to the cancellation of the UNDP contribution. However co-financing is not required for Enabling Activities and therefore the change is consistent with the requirements of the Co-Financing Policy and Guidelines.

A clarification on the impact (or absence thereof) of this reduction of co-financing on the ability to reach project objectives would however still be relevant, in particular given the increased scope.

The confirmed expected amounts from the Federal Ministry of Environment of Nigeria is identical to the PIF and is supported by a co-financing letter which describes the in-kind contribution and its purpose.

#### Agency Response

**9 November 2022:**

The reference of UNDP co-finance is now removed.

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(Previous responses)

Thanks for the GEF comment. Clarification has been provided in Part II Section B. ENABLING ACTIVITY GOALS, OBJECTIVES, AND ACTIVITIES, Item: Project Immediate Objective.

#### GEF Resource Availability

**Is the proposed GEF financing in Table D (including the Agency fee) in line with GEF policies and guidelines?**

#### Secretariat comment at CEO Endorsement Request

Cleared

August 31 2022 (RR):

**Yes. The set-aside resource is under the cost of modality 2 of the information note (GEF/C.59/Inf.19).**

#### Agency Response

**Are they within the resources available from:  
The STAR allocation?**

Secretariat comment at CEO Endorsement Request

Cleared

August 31 2022 (RR):

Yes, the project seeks \$1,904,733 (excluding Agency Fee) from Nigeria's STAR allocation.

Agency Response

**The focal area allocation?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response

**The LDCF under the principle of equitable access**

Secretariat comment at CEO Endorsement Request N/A

Agency Response

**The SCCF (Adaptation or Technology Transfer)?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response

**Focal area set-aside?**

Secretariat comment at CEO Endorsement Request

Cleared

August 31 2022 (RR):

Yes, this project seeks \$500,000 (excluding Agency Fee) from the CCM set-aside, which is under the maximum funding as the preparation for a combined BTR/NC as indicated in the informal note (GEF/C.59/Inf.19).

Agency Response

**Is the financing presented adequate and demonstrate a cost-effective approach to meet the project objectives?**



Secretariat comment at CEO Endorsement Request  
Cleared.

October 24 2022(RR):

Thank you for the clarification and added details

August 31 2022 (RR)

The project will draw on experiences of the past transparency-related projects, in particular TNC. The project will not only prepare for the submission of 4NC and BTR1 and 2 but also enhance institutional and technical capacities of the transparency framework in Nigeria to meet the requirements of these reports. Meeting the obligations of the MPGs under Article 13, beyond the project timeline (BTR1 and 2), will require significant improvements on institutional arrangement to the GHG inventory to tracking progress of NDC, which will be addressed by the project.

1. However, the project document outlines that the cost-effectiveness of the project is justified by the seeking of synergies with other ongoing initiatives on the subject. With this regards, such initiatives are not yet fully identified in the document and some initiatives identified at PIF stage are now absent from the list. A revision would be relevant on this aspect.

2. Furthermore, the financing allocation among components has significantly changed since PIF and such changes including how the proposed budget remains sufficient to reach project objectives could be justified in more details.

## Agency Response

(Previous responses)

1. Thanks for the GEF comment. Initiatives identified in the PIF are now reinstated and new ones added, including explanations on the synergies as per responses to comments 4 and 5 above.

2. Thanks for the GEF comment. Justification has been provided in the CEO ER document ? Part II Section B. ENABLING ACTIVITY GOALS, OBJECTIVES, AND ACTIVITIES, Item: Project Immediate Objective, Table 5. Changes brought from PIM to CEO ER document

### **Part 2: Enabling Activity Justification**

#### **Background and Context.**

**Are the achievements of previously implemented enabling activities cited since the country(ies) became a party to the Convention?**

Secretariat comment at CEO Endorsement Request  
Cleared.

August 31 2022 (RR):

Yes, past NCs and BURs as well as ongoing relevant activities are well described while summarizing gaps identified by these activities as well as the ICA process. It is noted that the NC4 is now proposed with a delay of 2 years compared to the previous estimate.

Agency Response

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**Goals, Objectives, and Activities.**

**Is the project framework sufficiently described?**

Secretariat comment at CEO Endorsement Request  
Cleared.

October 24 2022(RR):

Thank you for the revisions, which are well noted. It is also noted that since an Adaptation Communication was published in 2021, it is not expected to be included in the scope of this support - in case second iteration is foreseen that would draw from the outputs of this support, it would be useful to report it. For future reference, it would also be useful for clarity purposes to include the the changes from PIF stage outlined in table 5 at the beginning of the CEO ER.

August 31 2022 (RR):

1. As detailed above, further descriptions and clarifications are relevant in particular at activities level with regards to the update in scope of the project (BTR2, new dates of submission), covid19 mitigation measures, effective synergies with other initiatives, role of international, CSO and research partners in the stakeholder engagement plan, implications of NDC revision.

2. Rio marker classification 2 (principal objective) is used for Land Degradation. This seems inconsistent with the outlined objective which targets primarily climate change and as land degradation is not directly and explicitly targetted. With sufficient justification, a Rio marker 1 could be used for both Land Degradation and Biodiversity if those are significant objectives under this project. However, in order to justify these markers, further clarification (including in terms of related activities and expected outcomes of the project and how these meet the eligibility criteria for these markers)

would be needed in order to demonstrate how biodiversity and land degradation are considered as a significant objective under this project (so far this is mentioned once in the background section).

## Agency Response

**9 November 2022:**

Thanks for the GEF Secretariat comment and future reference. This is noted.

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(Previous responses)

1. Thanks for the GEF comment. Further descriptions and clarifications have been made in the CEO ER document in Part II, sections A, B and C as provided in the responses to this review under headers Project description summary, Are they within the resources available from (mark all that apply) and Stakeholders.

2. Rio markers on biodiversity and land degradation are now removed.

### **Stakeholders.**

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

### Secretariat comment at CEO Endorsement Request

Cleared.

October 24 2022(RR):

Thank you for the added reporting stakeholder consultation and engagement and for the further clarification of the role of International Organizations and Development Organizations.

August 31 2022 (RR)

The UNDP Project document annex includes a stakeholder engagement plan. A brief description of stakeholder involvement is available under section B outlining how a workshop was organized with national stakeholders in order to identify gaps and needs.

Details on engagement (at design phase and planned) with international stakeholders and other partners and similar initiatives in this area are however not available in this context. In particular, the "International Organizations and Development Organizations" section of the stakeholders matrix, which was outlined at PIF stage, has now disappeared from the documentation and planning. As outlined in other parts of this review, such information that is key to the success of the project would be welcome back into the description.

Agency Response  
(Previous responses)

The report on the second stakeholder consultation and engagement workshop held in May 2022 has been included in the CEO ER document in Part II Section B. ENABLING ACTIVITY GOALS, OBJECTIVES, AND ACTIVITIES, Item: Stakeholder involvement Also, involvement of "International Organizations and Development Organizations" has been reinstated in the matrix in part II Section B. ENABLING ACTIVITY GOALS, OBJECTIVES, AND ACTIVITIES, Item: Stakeholder involvement, describing the key stakeholders and their role in the project

**Gender equality and women's empowerment.**

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

Secretariat comment at CEO Endorsement Request

Cleared.

October 24 2022(RR):

Thank you for the clarification.

August 31 2022 (RR)

A gender analysis has been completed and included in the UNDP Project Document Annex along with a gender action plan. However, the CEO approval request mentions that it is included as a dedicated Annex 9, which is not found in the request. If the intention was to submit a separate document, a resubmission would be welcome, or a clarification on whether this was a reference to the ProDoc.

Agency Response  
(Previous responses)

Thanks for the GEF comment. Previously the Gender Action Plan was only shared as an annex to Prodoc. Now, this is also uploaded to portal separately.

**Monitoring and Evaluation.**

**Does the project include a budgeted M&E Plan?**

Secretariat comment at CEO Endorsement Request

Cleared

August 31 2022 (RR):

Yes. Although a budgeted M&E plan is not required for EA, the project has included an M&E plan under section E as well as in the UNDP Project Document annex, which includes a budget for execution. This is considered adequate for the size of the project.

Agency Response

**Cost Effectiveness.**

**Is the project cost effective?**

Secretariat comment at CEO Endorsement Request

Cleared

October 24 2022(RR):

Thank you for the clarifications.

August 31 2022 (RR):

Pending clarifications related to the new scope and synergies with other initiatives.

Agency Response

(Previous responses)

Clarifications have been provided on the new scope and synergies with other initiatives in the CEO ER document as detailed in responses above to the review comments.

**Cost Ranges**

**If there was a deviation in the cost range, was this explained?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response

**Part III. Endorsement/Approval by OFP**

**Country endorsement**

**Has the project been endorsed by the country's GEF Operational Focal Point and has the name and position been checked against the GEF database?**

Secretariat comment at CEO Endorsement Request

Cleared

August 31 2022 (RR):

Yes, the OFP endorsement letter is submitted and signed by the OFP within the Federal Ministry of Environment.

Agency Response

**Response to Comments**

**Are all the comments adequately responded to? (only as applicable)**

GEF Secretariat Comment

Cleared

November 9 2022(RR):

Comments adequately responded to.

October 24 2022(RR):

Yes, pending on title change on the portal.

Agency Response

**Other Agencies comments?**

Secretariat comment at CEO Endorsement Request N/A

Agency Response

**Council comments**

Secretariat comment at CEO Endorsement Request

Cleared

Additional details also available in annex 13 of the project document.

October 24 2022(RR):

Thank you for the added clarity and integration of answers to council comments throughout the CEO endorsement request.

1. Details added regarding capacity development and institutionalization of capacities throughout part II.

3. Tracking of financial flows clarified under output 4.1.2

4. Thank you for the added identification of synergies.

August 31 2022 (RR):

While information is available for several council comments, several remain unanswered at this stage and would benefit from some further clarifications :

1. Capacity development and institutionalization of capacities : Further clarification useful. The approach for capacity development and related stakeholder engagement is further outlined, included in the stakeholder engagement planning and related responsibilities of the project execution entity. This is however not prepared under the form of a dedicated plan for institutionalization of capacities : a clarification on this point would be useful. Furthermore, tracking of the equal representation of civil society and research organization in the capacity development measures is made challenging by the change in component structure - currently, this information is not found in the description of related activities and outputs.

2. Reference to updated climate change legislation : Answered. The climate change bill from November 2021 is now included in the list of key policies and legislations.

3. Support to tracking financial flows : Further clarification useful. In output 4.1.2 such activities are alluded to. However the scope is not clear whether it relates to Nigeria's NDC, and if it covers national budgets and expenditures as well as its linkages to conditional and unconditional efforts.

4. Mainstreaming adaptation : Answered : details are provided in particular identifying a need for further assessments and development of the M&E system; activities are included in the outcome matrix.

5. Cooperation format and NDC partnership : further clarification useful. The NDC Partnership is not mentioned in the documentation and the identification of other relevant initiatives and partners is less detailed than the PIF document. Several initiatives relevant for this project are mentioned, for example in the enclosed page (<https://ndcpartnership.org/countries-map/country?iso=NGA> ). Reference can also be made to the CBIT project 10809 (Strengthening the capacity of institutions in Nigeria to implement the transparency requirements of the Paris Agreement) and to its own identification or relevant stakeholders. Regarding cooperation format, types of agreement are referred to but how these will contribute to synergies is not identified in details.

6. Dedicated section on political risks: Answered. Risks identification is included in the scope of the steering committee in a generic way, and then further detailed in particular in annex 5 regarding risks concerning changes in political priorities, institutional risks, lack of interest from key stakeholders as well as personnel turnover.

#### Agency Response

(Previous responses)

1. Thanks for the GEF comment. The CEO ER document has been amended in its Part II Section B ENABLING ACTIVITY GOALS, OBJECTIVES, AND ACTIVITIES, Item: Project immediate Objective to include a plan with further details provided under each activity in Part II Section C. DESCRIBE THE ENABLING ACTIVITY AND INSTITUTIONAL FRAMEWORK FOR PROJECT IMPLEMENTATION item Narrative description of project activities

3. Thanks for the GEF comment. Part II Section C. DESCRIBE THE ENABLING ACTIVITY AND INSTITUTIONAL FRAMEWORK FOR PROJECT IMPLEMENTATION item Narrative description of project activities has been updated to clarify financial flows.

5. The CEO ER document under PART II: Section A. ENABLING ACTIVITY BACKGROUND AND CONTEXT has been amended to respond to this , including Table 4.

#### **STAP Comments**

Secretariat comment at CEO Endorsement Request N/A

#### Agency Response

**Convention Secretariat comments**

Secretariat comment at CEO Endorsement Request N/A

#### Agency Response

**CSOs comments**

Secretariat comment at CEO Endorsement Request N/A

#### Agency Response

**GEFSEC DECISION**

#### **RECOMMENDATION**



**Is CEO Endorsement/approval recommended?**

**Secretariat comment at CEO Endorsement Request**

November 15 2022 (RR):

The CEO endorsement is recommended

The budget table has been adjusted to fit the portal margins, by merging the columns for project sub-components. The detailed budget per sub-component remains available in the project document.

November 9 2022(RR):

The CEO endorsement is recommended from a technical standpoint.

October 24 2022 (RR):

Not yet - three minor clarifications to provide on co-financing, project title and updates in synergies with related initiatives.

Thank you for re-submitting with highlighted changes and for reaching out to the GEFSEC in case of IT issue in adjusting the title.

**Review Dates**

	<b>Secretariat Comment at CEO Endorsement</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>	<b>8/31/2022</b>	<b>10/10/2022</b>
<b>Additional Review (as necessary)</b>	<b>10/24/2022</b>	<b>11/9/2022</b>
<b>Additional Review (as necessary)</b>	<b>11/9/2022</b>	
<b>Additional Review (as necessary)</b>	<b>11/15/2022</b>	
<b>Additional Review (as necessary)</b>		

## **CEO Recommendation**

### **Brief reasoning for CEO Recommendations**

The project is being recommended for CEO endorsement.

Since PIF stage, an update of the scope has been operated with the bundling of the support to BTR1 preparation with the preparation of BTR2 together with the fourth National Communication.

Comments from the Council and GEF Secretariat have been answered to, in particular in terms of :

- capacity development and institutionalization of capacities
- updated institutional and legislative context, including in light of new climate change law and revised NDC
- further identification of risks, including political risks, and mitigation measures
- synergies with ongoing or planned initiatives including CBIT support.
- adaptation mainstreaming
- support to tracking of financial flows