

# Enabling Pakistan to prepare its second Biennial Transparency Report (BTR2) and third BTR with a combined fourth National Communication (BTR3/NC4)

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

12166

**Countries**

Pakistan

**Project Name**

Enabling Pakistan to prepare its second Biennial Transparency Report (BTR2) and third BTR with a combined fourth National Communication (BTR3/NC4)

**Agencies**

FAO

**Date received by PM**

12/10/2025

**Review completed by PM**

**Program Manager**

Saba Kalam

**Focal Area**

Climate Change

**Project Type**

EA

## **Expedited Enabling Activity req (CEO)**

### **Section I - Enabling Activity Summary**

#### **Funding elements.**

**Is the enabling activity aligned with the relevant GEF funding elements as indicated in Table A and as defined by the GEF-8 Programming Directions? Is the General Enabling Activity Information table correctly populated?**

#### Secretariat's Comments

1/6/2026

Cleared

12/16/2025

1. Please fill the relevant sections highlighted in red

**SECTION 1: ENABLING ACTIVITY SUMMARY**

Enabling Activity Title

Enabling Pakistan to prepare its second Biennial Transparency Report (BTR2) and third BTR with a combined fourth National Communication (BTR3/NC4)

Country(ies)	GEF Enabling Activity ID
Pakistan	12166
GEF Agency(ies):	GEF Agency Enabling Activity ID
FAO	755957
Submission Date	Expected Implementation Start
12/10/2025	2/1/2026
Project Executing Entity(s):	Executing Partner Type
Ministry of Climate Change and Environmental Coordination (MoCC)	Government
GEF Focal Area (s)	Expected Duration (In Months)
Climate Change	36
Type of Report(s)	Expected Report Submission to Convention

Agency's Comments

RE: 12/16

Thank you for your feedback. The Portal is updated accordingly.  
**Cost Ranges.**

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

Secretariat's CommentsCleared, no deviation. EA-set aside is \$1,233,000 is within the threshold. ( \$633,000 for combined NC/BTR and \$600,000 for standalone BTR). The project will produce one combined NC4/BTR3 and a standalone BTR2 to be submitted to UNFCCC.

Agency's Comments

**Enabling activity summary.**

**Is the enabling activity summary clear? Are the components in Table B and as described in the enabling activity request sound, appropriate, and sufficiently clear to achieve the project objectives?**

## Secretariat's Comments

1/6/2025

Cleared

12/16/2025

1. Outcome 2.1 should explain whether the inventory will be developed only on the basis of 2006 IPCC Guidelines or the 2019 Refinement will be considered.
2. Outcome 2.1 and 2.2 should highlight reporting in accordance with the Modalities, Procedures and Guidelines for the ETF.
3. Include reference to reporting on tier levels to be used for key categories.
4. Outcome 2.1 mentions "recalculations", please describe why this will be required.
5. Please highlight any recommendation Technical Expert Review and Facilitative Multilateral Consideration of Progress (if that happened for BTR1) or the FSV of the previous BUR/NC

## Agency's Comments

RE: 12/16

1. Text in table updated to clarify that the GHG inventory will be developed in accordance with the 2006 IPCC Guidelines and the 2019 Refinement, as applicable.
2. Text updated to explicitly reference reporting in line with the ETF MPGs
3. Text updated to clarify that key categories will be estimated at the highest possible Tier, in line with IPCC Guidelines and ETF MPGs (indeed subject to assessment of data availability and national circumstances during GHG inventory preparation).
4. The text revised to clarify that recalculations will be undertaken only when needed, in line with IPCC Guidelines and ETF MPGs
5. The TER for BTR1 has not yet been conducted. Nevertheless, the prodoc reflects priority improvement areas identified through national processes that informed the preparation of the *?BTR1 Stocktaking Exercise and the Project Implementation Plan (PIP) for Pakistan?s BTR2?*.

## Section 2 - Enabling Activity Supporting Information

### Eligibility Criteria.

### Is this enabling activity eligible for GEF funding?

## Secretariat's Comments

12/16/2025

Cleared. Pakistan has submitted its first BTR to UNFCCC in Dec 2024. The second BTR is due in Dec 2026 and third in Dec 2028. The request is to develop these two BTRs and the full National Communication as part of the convention.

## Agency's Comments

### Institutional framework.

#### Are the institutional arrangements for implementation adequately described?

### Secretariat's Comments

2/19/2026

Cleared. EA has been changed to UNOPS and Ministry of Climate Change and Environmental Coordination (MoCC)


1/31/2026

There are no responses from the agency in the section below (Agency's Comments). Please provide your response and specify if any changes have been made.

12/16/2025

1. (OP team) It is well noted that agency has annexed a stakeholder matrix. That said please ask agency to elaborate on then specific NGOs and CSOs to be engaged and project approach and means of engagement and consultation.

2. (OP Team)Executing Partner endorsed in the LoE (UNOPS) is different than in the Enabling Activity Summary (Third Party) and that included by you in the Review Sheet (Ministry of Climate Change and Environmental Coordination (MoCC)) - please ask the Agency to include the MoCC in Enabling Activity Summary.

SECTION 1: ENABLING ACTIVITY SUMMARY 			
Enabling Activity Title: ⓘ	Enabling Pakistan to prepare its second Biennial Transparency Report (BTR2) and third BTR with a combined fourth National Communication (BTR3/NC4)		
Country(ies): ⓘ	Pakistan	GEF Enabling Activity ID: ⓘ	12166
GEF Agency(ies): ⓘ	FAO	GEF Agency Enabling Activity ID: ⓘ	755957
Project Executing Entity(s): ⓘ	Third party	Executing Partner Type:	Others
GEF Focal Area (s): ⓘ	Climate Change	Submission Date: ⓘ	12/10/2025
Expected Implementation Start: ⓘ	2/1/2026	Expected Duration: ⓘ	36 In Months
Type of Report(s): ⓘ	UNFCCC Biennial Transparency Report (BTR) UNFCCC Biennial Transparency Report/ National Communication (BTR/NC)	Expected Report Submission to Convention: ⓘ	12/31/2026 12/31/2028

## Agency's Comments

RE: 1/31:

We see both MoCC and UNOPS in the submission page as below. Please advise.

## Enabling Activity (CEO) – GEF - 8

### SECTION 1: ENABLING ACTIVITY SUMMARY

<b>Enabling Activity Title:</b> ⓘ	Enabling Pakistan to prepare its second Biennial Transparency Report (BTR2) and third BTR with a c Communication (BTR3/NC4)	
<b>Country(ies):</b> ⓘ	Pakistan	<b>GEF Enabling Activity ID:</b> ⓘ
<b>GEF Agency(ies):</b> ⓘ	FAO	<b>GEF Agency Enabling Activity ID:</b>
<b>Project Executing Entity(s):</b> ⓘ	UNOPS Ministry of Climate Change and Environmental Coordination (MoCC)	<b>Executing Partner Type:</b>
<b>GEF Focal Area (s):</b> ⓘ	Climate Change	<b>Submission Date:</b> ⓘ
<b>Expected Implementation Start :</b> ⓘ	2/1/2026	<b>Expected Duration :</b> ⓘ
<b>Type of Report(s):</b> ⓘ	UNFCCC Biennial Transparency Report (BTR) UNFCCC Biennial Transparency Report/ National Communication (BTR/NC)	<b>Expected Report Submission to Convention:</b> ⓘ

RE 12/16:

1. Names of NGOs and their roles added
2. Added UNOPS and MoCC in the Summary  
**Monitoring and Evaluation.**

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

Secretariat's Comments

12/16/2025

Cleared

Agency's Comments

**Section 3. Information Tables**

**GEF resource availability.**

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

**Secretariat Comment at PIF/Work Program Inclusion**

12/16/2025

Cleared

**Agency Response**

**Are they within the resources available from (mark all that apply):  
STAR allocation?**

Secretariat's Comments Not Applicable

Agency's Comments  
**Focal Area allocation?**

Secretariat's Comments

12/16/2025

Cleared. To be funded from CCM- EA-Set aside

Agency's Comments  
**LDCF under the principle of equitable access?**

Secretariat's Comments Not Applicable

Agency's Comments  
**SCCF (Adaptation or Tech Transfer)?**

Secretariat's Comments Not Applicable

Agency's Comments  
**Focal Area Set Aside?**

Secretariat's Comments

12/16/2025

Cleared. To be funded from CCM- EA-Set aside

Agency's Comments  
**Rio Markers.**  
**Are the Rio Markers for CCM, CCA, BD and LD presented?**

Secretariat's Comments

12/16/2025

Cleared.

Agency's Comments

**Country endorsement.**

**Has the project been endorsed by the country's GEF Operational Focal Point at the time of the EA submission and has the name and position been checked against the GEF database? Are the endorsed amounts consistent with the amounts included in Portal**

Secretariat's Comments

12/16/2025

The project has been endorsed by Ms. Khalida Bashir, OFP since September 2025.

Agency's Comments

**Response to Comments**

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

Secretariat's Comments

Agency's Comments

**Other Agencies comments**

Secretariat's Comments

Agency's Comments

**Council comments**

Secretariat's Comments

Agency's Comments

**STAP comments**

Secretariat's Comments

Agency's Comments

**Convention Secretariat comments**

Secretariat's Comments

Agency's Comments

**CSOs comments**

## Secretariat's Comments

### Agency's Comments

#### Project Budget Table.

**Is the project budget table attached? Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?**

## Secretariat's Comments

03/10/2026

1. Cleared. Table has been updated.
2. Cleared. To appropriately correspond the budget with ToR responsibilities, the budget for the Assistant has been changed to \$9512 from M&E and \$29,512 from the PMC.
3. Cleared.

2/20/26

1. Under the column "Responsible Entity", please include MoCC or UNOPS instead of Third Party for the **final three lines**. It is understood that the provider has not been identified - this will happen after a procurement process. Still, the "Responsible Entity" column should include the either MoCC or UNOPS as the entity that will oversee these expenditures. Please revise.

2. Thank you for edits to the Assistant TOR. However, they are not sufficient to justify 50% of the cost for this role being recovered from the M&E budget. First, there is no M&E experience required for this role as per the qualifications listed. In addition, the TOR already included a bullet on progress reporting, which is a core task of the PMU and eligible under PMC as per the [Guidelines](#) (p. 68 - see screenshot below).

Table B - Execution Functions eligible for funding by the GEF portion of PMC<sup>109</sup>

<p><u>Staffing costs, including:</u></p> <ul style="list-style-type: none"><li>• Project manager;</li><li>• Project assistant technical specialist(s);</li><li>• Procurement specialist; and/or</li><li>• Financial specialist.</li></ul> <p><u>Project-related activities of Executing Entity, including:</u></p> <ul style="list-style-type: none"><li>• Preparation of procurement plans;</li><li>• Terms of reference and procurement packages;</li><li>• Management of consultant activities;</li><li>• Management of output deliverables;</li><li>• Maintenance of records of all project-related documentation;</li><li>• Management and administration of the Knowledge Management Plan;</li><li>• Preparation of progress reports and financial reports for the project;</li><li>• Consultation with project stakeholders;</li><li>• Financial auditing for the project.</li></ul>
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Please improve the justification for this budget allocation in the relevant TOR or remove the M&E allocation from the Assistant budget line.

3. Kindly note that the M&E budget stands at only 3.6% of the total GEF requested resources; typically projects up to \$5M in financing will have M&E budgets equal to 5% of the total grant. Please consider increasing the M&E budget to add M&E expertise, if/as needed.

4. Thank you for calling attention to the personnel costs in EA budgets for recent FAO projects in Ethiopia and Timor Leste. While GEFSEC strives to provide standardized comments across all submissions, there may be errors as a result of the many individuals who process project reviews. Such occurrences are indeed mistakes and do not constitute a policy change or serve as precedent. No further action is required on this item.

1/31/2026

Cleared.

1/16/2026

(OP Team)

1. Under the column ?Responsible Entity?, please include MoCC instead of Third Party (in red rectangle).

2. Half of the salary of the Administrative Assistant is charged to M&E component, but per the TORs, for this position there is no task/responsibility associated with M&E (in green rectangle below) ? please ask the Agency to amend.

3. The cost of the personnel (staff + consultants) accounts for 41% of the budget. Please consider reducing this budget.

FAO Cost Categories	Unit	No. of units	Unit cost	Component 1 Total	Component 2 Total	Component 3 (M&E) Total	PMC	Total GEF	Executing Entity
<b>5013 Consultants</b>									
PMU									
Project technical coordinator	Month	36	4,207	30,290	60,581	15,145	45,436	151,452	Third party
Admin assistant	Month	36	1,084			19,512	19,512	39,024	Third party
Technical experts									Third party
NDC Tracking Expert	Report	2	85,000	17,000	153,000	-	-	170,000	Third party
Finance, Technology & Capacity Building Expert	Report	2	33,853	6,771	60,935	-	-	67,706	Third party
Quality Assurance Experts	Report	2	25,415	5,083	45,747	-	-	50,830	Third party
Editor	days	40	328	-	13,120	-	-	13,120	Third party
Reports layout design expert	days	40	328	-	13,120	-	-	13,120	Third party
<b>Sub-total national consultants</b>				<b>59,144</b>	<b>346,503</b>	<b>34,657</b>	<b>64,948</b>	<b>505,252</b>	Third party
<b>5013 Sub-total consultants</b>				<b>59,144</b>	<b>346,503</b>	<b>34,657</b>	<b>64,948</b>	<b>505,252</b>	
<b>5050 Contract</b>									
Service contracts for GHGI chapter (outcome 2.1)									
	Report	2	85,000	17,000	153,000	-	-	170,000	National entities
Service contracts for Adaptation and Vulnerability assessment chapter (outcome 2.3)									
	Report	2	83,785	16,757	150,813	-	-	167,570	National entities
Service contracts for other information (institutional)									
	Report	2	40,000	8,000	72,000	-	-	80,000	National entities
Service contracts for Systematic Observation									
	Report	1	28,000	2,800	25,200	-	-	28,000	National entities
Terminal report	Number	1	6,550	-	-	6,550	-	6,550	FAO
<b>5050 Sub-total Contracts</b>				<b>44,557</b>	<b>401,013</b>	<b>6,550</b>	<b>0</b>	<b>452,120</b>	
<b>5021 Travel</b>									
GHGI related travel subject to number of workshops									
	Number	6	2,205	1,323	11,907	-	-	13,230	Third party
NDC Tracking consultation Provincial and Federal									
	Number	6	2,205	1,323	11,907	-	-	13,230	Third party
Adaption wulnerability assessment related travel									
	Number	6	2,205	1,323	11,907	-	-	13,230	Third party
Gender and Climate Change related travel									
	Number	4	2,205	882	7,938	-	-	8,820	Third party
International travel									
	Number	8	6,615	5,292	47,628	-	-	52,920	Third party
Domestic travel-MoCC Officials Participation									
	Number	6	2,205	1,323	11,907	-	-	13,230	Third party
<b>5021 Sub-total travel</b>				<b>11,466</b>	<b>103,193</b>	<b>0</b>	<b>-</b>	<b>114,659</b>	
<b>5023 Training</b>									
Inception Workshop									
	Number	1	5,512	5,512	-	-	-	5,512	Third party
Consultation WS on GHGI									
	Number	6	3,307	1,984	17,860	-	-	19,844	Third party
Consultation WS on Adaptation									
	Number	6	3,307	1,984	17,860	-	-	19,844	Third party
Consultation WS on FTC									
	Number	4	3,307	1,323	11,907	-	-	13,230	Third party
Consultation WS on Gender and Climate Change									
	Number	6	3,307	1,984	17,860	-	-	19,844	Third party
Validation & Dissemination Workshop									
	Number	2	11,025	11,025	-	-	-	22,050	Third party
Ad hoc capacity building sessions on ETF matters									
	Number	5	6,615	3,307	29,767	-	-	33,079	Third party
<b>5023 Sub-total training</b>				<b>27,121</b>	<b>106,280</b>	<b>0</b>	<b>-</b>	<b>133,401</b>	
<b>5024 Expendable procurement</b>									
Printing 300 copies									
	unit	296	55	0	16,323	-	-	16,323	Third party
<b>5024 Sub-total Expendable procurement</b>				<b>0</b>	<b>16,323</b>	<b>0</b>	<b>-</b>	<b>16,323</b>	
<b>5025 Non Expendable procurement</b>									
Laptop									
	Lumpsum	2	1,654	0	0	-	3,307	3,307	Third party
<b>5025 Sub-total Non Expendable procurement</b>				<b>0</b>	<b>0</b>	<b>-</b>	<b>3,307</b>	<b>3,307</b>	
<b>5028 General operating expenses</b>									
Communication expenses (internet, mobiles etc)									
	Month	36	221	-	-	-	7,938	7,938	Third party
<b>5028 Sub-total GOE</b>				<b>-</b>	<b>-</b>	<b>-</b>	<b>7,938</b>	<b>7,938</b>	
<b>TOTAL</b>				<b>142,288</b>	<b>973,312</b>	<b>41,207</b>	<b>76,193</b>	<b>1,233,000</b>	

1/6/2026

The project executing entity as per the summary table is the Ministry of Climate Change and Environmental Coordination. Whereas, the executing entity listed in the budget sheet is "Third Party". The executing entity in both cases should be the same i.e Ministry of Climate Change and Environmental Coordination.

12/16/2025

1. Please include a column for Executing Entity and highlight what all activities will be executed by MoCC

FAO Cost Categories	Unit	No. of units	Unit cost	Component 1	Component 2	Component 3 (M&E)	PMC	Total GEF	Executing Entity
				Total	Total	Total			

Agency's Comments

RE 2/20:

1. Updated accordingly.
2. We updated the budget allocation between M&E and PMC of the PMU staff.
3. Thank you for the additional guidance. For an EA project, it's often difficult to meet the suggested 5%, and we believe that the current allocation could sufficiently manage the required M&E tasks.
4. Noted with thanks.

Re: 1/16/2026

1) Budget table update by including UNOPS instead of Third Party and MoCC instead of National Entities.

The TOR reports the following task for admin assistant: *Contribute to project monitoring and evaluation by maintaining up-to-date records, collecting data, and assisting in progress tracking and reporting.*

3) In EA projects, the majority of activities are typically implemented by consultants and the PMU. In recently approved FAO-implemented EA projects for Timor-Leste and Ethiopia, PMU and consultants' costs account for approximately 80 percent of the total project budget.

Re: 1/6/2026

The summary table is updated.

RE: 12/16

The budget table is updated.  
**Environmental and Social Safeguards.**

**If there are screening documents or other ESS documents available, have these been attached? (only as applicable)**

Secretariat's Comments

12/16/2025

Please upload the ESS document

Agency's Comments

RE: 12/16

The ESS document has been uploaded.  
**GEFSEC DECISION  
RECOMMENDATION.  
Is CEO endorsement/ approval recommended?**

Secretariat's Comments

<b>REVIEW DATE(S)</b>	<b>Secretariat Comment at CEO Endorsement</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>	<b>12/16/2025</b>	
<b>Additional Review (as necessary)</b>	<b>1/6/2026</b>	
<b>Additional Review (as necessary)</b>	<b>1/16/2026</b>	
<b>Additional Review (as necessary)</b>	<b>3/9/2026</b>	
<b>Additional Review (as necessary)</b>		