

Regional program for integrated water resources management in the transboundary basin of the Ubangi River between the Central African Republic (CAR) and the Democratic Republic of Congo (DRC)

Review PIF and Make a recommendation

Basic project information

GEF ID

11906

Countries

Regional (Central African Republic, Congo DR)

Project Name

Regional program for integrated water resources management in the transboundary basin of the Ubangi River between the Central African Republic (CAR) and the Democratic Republic of Congo (DRC)

Agencies

AfDB, IUCN

Date received by PM

3/6/2025

Review completed by PM

3/13/2025

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

(3/12/25)

The project **overall** is eligible for finance under the IW Focal Area while comments need to be addressed (incl a few IW ineligible sub-activities) . The project information table is correctly populated.

1. Overall comment: please tighten the PIF text and aim to adhere to the recommend length for each section. Currently the PDF file spans over 57 pages.

(4/17/2025)

Cleared

Agency's Comments

4/14/25

The document size has been reduced from more than 57 pages to 41 pages. Most sections have been re-written to facilitate the size reduction.

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

(3/12/25)

1. Please provide a rationale for not including the Republic of Congo in the project.
2. Please explain the relation between the mentioned *framework agreement* and the *CICOS accord*. Please note: If this is under the overall CICOS Accord, then it can legally not be a framework agreement.
3. Please provide more detail on what the NBS interventions and agroforestry measures are aimed at in relation to the main threats to the Ubangi and what are their anticipated impacts.

(4/17/2025)

1. We acknowledge that capacity constraints at both CICOS and country levels are a significant hurdle and the PREDIRE co-finance is essential to make the effort viable.
2. Noted, please seek cooperation with the Congo Basin IP which has set aside funds for a bilateral agreement on the Ubangi. The current proposed project and TDA and SAP process could build the foundation to support the process towards such a sub-basin agreement.
3. Noted. This will be further reviewed under the section "project description".

Cleared.

Agency's Comments

4/14/25

1. PREDIRE baseline is for two countries so no anchor for GEF projects in Congo republic.

Project co-financing comes solely from PREDIRE; adding the Republic of Congo will further reduce the required co-financing capacity.

2. The aim is to strengthen the framework for collaboration between the DRC and the CAR on the Ubangi region. There is no question of getting the two states to sign new agreements. This activity has been reformulated.

3. The NBS interventions have 4 aims ? to curtail catchment degradation, control erosion/siltation, improve livelihoods and engage the local SMEs. These are described in Component 3 of the revised PIF.

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

(3/12/25)

1. Please tighten the PDO to be less general and be more closely aligned and to the expected end of project goal.

2. Note: The TDA is a technical document and only needs agreement on that level (not on ministerial level) while the SAP and NAPs have to be signed by relevant Ministers of each country.

3. With respect to Output 1.3.1, please see comment 2. above.

4. WASH infrastructure usually is not IW eligible unless it supports tertiary or other for the region innovative applications. WASH is to be addressed by the AfDB co-finance.

5. Please spell out acronyms when first used and in all tables (here e.g. REGIDESO and SODECA).

6. Do you mean artisanal miners or minors (i.e. children)? We assume it is the former. While minors are unfortunately often involved in mining in the region, this is practice that needs to be regulated and enforced and also incentivized to no longer occur.

7. How is water provision and water leak detection linked to the project objective and IW support for cooperative governance and sustainable management of the river? Please explain or rather include in the AfDB co-financed activities. Same for water kiosks.

8. What water transfer schemes is the reference to? Please note that GEF finance will not be supporting out of basin transfers.

(4/17/2025)

1. Addressed
2. The change is noted, but please note to include in the final document for endorsement a further clarification for the SAP top be **signed by** at least one Minister (usually the Minister of Water Resources) in both DR Congo and CAR.
3. Noted.
4. Noted
5. Thank you
6. Thank you for the clarification.
7. Addressed/noted.
8. Addressed/noted. Though it would have been good to know what the reference was towards.

Cleared

Agency's Comments

4/14/25

1. This has been done. The new objective reads: Strengthening transboundary cooperation and management of water resources and associated ecosystems to improve climate resilience and livelihoods in the Ubangi River Basin.
2. It is now mentioned that only the SAP and the NAP will be subject to validation by the key sectoral ministries This is addressed in new Output 1.1.2 in which the NAPs are ?...approved by the relevant ministries...?
3. This output has been removed, replaced by Output 2.2.1 in which a regulatory framework is developed and submitted to the two countries for approval.
4. All WASH service delivery activities (2.1.1 on manager training, 2.1.4 on leak detection, 2.2.2 on water kiosks, and 2.2.3 on operation and maintenance teams) have been removed.
5. These have been provided in both French and English translations.
6. We meant miners. Focus on artisanal mining is now placed on community led pollution monitoring. This is reflected in new Output 3.1.4
7. This has been removed, refer to response on point 4 on WASH infrastructure.

8. This has been removed from the GEF project.

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

Secretariat's Comments

(3/12/25) Yes.

KM is adequately budgeted for including addressing IW:LEARN participation (which should be budgeted for by at least 1% of the GEF grant).

Comments on addressing gender are included under section "project description below.

(4/17/2025)

KM is budgeted incl. IW:LEARN. By endorsement, please move the KM efforts, including exchanges with Amazon, IW:LEARN participation and the regional partners forum out of M&E and into a sub-component.

Cleared

Agency's Comments

4/14/25

This is well-noted.

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

(3/12/25) Yes.

PMC is within 5% of the GEF grant and proportional to co-finance of the overall grant.

Cleared

Agency's Comments

4/14/25

This is well-noted.

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

(3/12/25)

1. The rationale outlines a number of the weaknesses in the current state of cooperation among the countries, including some reluctance of DR Congo to support basin-wide IWRM and the institutional and technical weaknesses of CICOS.

One question this raises includes: If DRC is so reluctant to engage in basin management and in CICOS, why would it engage in bilateral cooperation over the Oubangui and what would the project do to ensure and sustain this engagement? This needs to be more clearly presented and addressed as otherwise the project is likely to not change the situation and not move the needle towards sustained cooperation and country support to CICOS (note: this is also expressed by the continued arrears in country contributions).

2. Enhanced cooperation through a substantial strengthening of CICOS to be able to carry out his intended functions should be explicitly addressed in the project design and be a stronger part of the project description.

[Note: do you really mean "hydraulicity"? or hydrology]

3. The description of threats, barriers and opportunities is taking a very diverse approach (e.g. across navigation, slash and burn ag; fisheries, mining, floods and droughts, circular economy

and recycling, run of the river HP, etc) and with that stays very general and without providing very much basin specific information is too generic. Furthermore, it outlines many issues that then the project does not address. A better rationale needs to be provided how the priority project interventions were selected and how they are logically connected - see ToC.

4. Other topics are then also described such as circular economy technologies, ecosystems management and benefit sharing - yet describes the IUCN approach for benefit sharing as blueprint that could be applied to any scale which rather doubtful. Please provide more specific detail and relate this para then to the project design - if indeed addressed by the project. Caution though that the challenges and barriers are already very diverse and adding yet another ambition may not aid.

(4/17/2025)

The revised background and rationale addresses the previous comments. Cleared.

Agency's Comments

4/14/25

1. The weakness of cooperation is actually due to CICOS's capacity (technical and financial) to mobilize resources and implement initiatives that contribute to strengthening cooperation in the region.

The DRC has not yet ratified the 2007 addendum on IWRM in the CICOS region. However, the signing of this addendum by its Head of State already allows for the implementation of IWRM. However, training and awareness-raising among sectoral administrations on cooperation in Ubangi remains very weak and maintains barriers to cooperation.

The problem of countries' arrears in their contribution payments is due to the weakness of CICOS's operational initiatives in the region, which can serve as leverage to encourage countries to increase their commitment, in terms of contributing to the sustainability of CICOS.

These weaknesses are acknowledged in the section on "Initiatives in the basin" in the project rationale. Specific capacity building actions to address some these weaknesses are suggested in Output 2.1.1 (transboundary cooperation), Output 2.1.2 (resource mobilization) and Output 2.1.3 (stakeholder engagement). The PREDIRE is also addressing the issues by supporting PIUs for project implementation. This is explained in the coordination arrangements section of the PIF.

2. A specific component for institutional development and strengthening of the technical capacities of CICOS has been proposed (Also see the response to 1 above.)

3. The section on threats has been re-written to focus only on those threats that are being addressed by the project. These are grouped into two: environmental challenges (climate, pollution, siltation, catchment degradation) and institutional challenges (institutions and socio-economic context).

4. These have been removed from the PIF.

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

(3/12/25)

1. As per the earlier comment and argument, there needs to be clearer logic presented why the project approach and areas of support are chosen given the many other threats which in fact would require a more regional approach, such as for flood and drought resilience, including early warning and preparedness.

2. As written the text describing the ToC is hard to entirely link with the schematic depicting the project design. The narrative of the ToC again addresses a wide variety of issues and topics incl. disaster risk management, elements of innovative circular economy, assessment of value chains and trade potential and an enabling environment for the private sector to name a few. These are not easily found then in the project design and issues addressed.

There is a serious mismatch in this. Please also refer back to an earlier comment to use the AfDB co-finance in support of WASH including water distribution.

3. Despite the effort to describe a large number of threats and barriers, the project does not at all mention political risks (instability, fragility, conflict-affected situations). Please elaborate as in a basin like the Ubangi/Oubangui, implementation in fact will be extremely difficult due to the fragility and instability situation.

3. While the PIF mentions a variety of stakeholders from the more national level (CICOS regional institutional engagement; inter-ministerial committees; etc.), stakeholders on subnational level and a rationale for much of component 2 is not very clear..

4. A simple narrative of future scenarios and the projects relevance and resilience in the face of these should be included.

(4/17/2025)

The rationale and barriers description has been revised and now underpins the pathways and ToC of the project and longer term threats mentioned. The revised text is sufficient for preliminary ToC and should be updated based on consultations and findings in the PPG phase. See next section/question in the review sheet.

Cleared.

Agency's Comments

4/14/25

1. The rationale chapter has been re-organized to limit threats to those being tackled (see response to 4.1 (3) above.
2. The ToC has been revised for the project and the text describing the ToC has been revised accordingly. The issues of circular economy, disaster risk, assessment of value chains have been removed.
3. The political context and the risks of instability of the two countries were added among the challenges section and as a risk to the project implementation.
3. Component 2 has been replaced by a new Component 3. The new component 3 builds on the national and regional consultation platforms that were created in 2014 by CICOS consisting of representatives of public bodies of States, the private sector and civil society. This will ensure the participation of sub-national and non-state actors. The approach is presented in the introduction to Component 3.
4. The climate projections are mentioned in the rationale for the project. The trends on population and degradation are also presented as part of the narrative.

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

(3/12/25)

1. Please revise the Theory of Change text and link key threats to ways to address them.
2. Currently, component 1 and 2 are disjointed. It is not clear why and how the legal and managerial aspects of component 1 actually support component 2 (and vice versa). It could be made clearer how better basin management supports water use and water users, including the ecosystem.
3. TDA and SAP in component 1: discussions of the agencies with CICOS and the two countries seem to have shown that the main threats to the river basin and wider ecosystem are not seen the same way by the countries nor are the opportunities for cooperation. That does provide rationale for a TDA/SAP process which is participatory and brings sectors and stakeholders across and within countries together to formulate these in a bottom up process. That said, this is not the first time that the Congo basin has formulated a strategic program: there has been a whole process that lead to the SDAGE (while this has been ten years back) and - as the PIF mentioned - there is a strategic program for 2016-20. The TDA/SAP process needs to take account of the previous processes and can and should build on these.
4. While the project outlines several efforts to support local communities, indigenous peoples, and women, the approach seems rather top-down. Please better describe the project's planned approach and plans to engage and consult these key stakeholders in project development to inform project strategy and activities.
5. Component 1: It is not clear how the component will strengthen CICOS. Also, in previous discussions it was understood that the AFDB PREDIRE project would work through and support CICOS strengthening as well. Please elaborate,
6. Gender:
 - Component 1 is the only component that explicitly addresses empowerment and support to women.
 - (i) please mainstream gender and consideration of women, youth and IPLCs throughout the project design where applicable;
 - (ii) Please explain what is meant with a "Regional and national strategic framework, and knowledge on IWRM and gender" being strengthened. Please add a sentence or two to illustrate what this means.
 - (iii) In Output 1.2.2., more than advocacy action, the project needs to introduce enabling/supporting mechanisms to allow the meaningful participation and engagement of women.
 - (iv) On KM, please ensure that knowledge produced also include lessons learned and best practice on advancing gender equality/women's empowerment.

7. Comp 1 is intending to support "Negotiation and adoption of a transboundary IWRM and river navigation framework agreement between the DRC and CAR." Can you clarify why this is needed and how this links to CICOS or is this something separate (and note -as mentioned earlier- if is this under the overall CICOS accord, then it can legally not be a framework agreement).

8. Please be more specific instead of somewhat generic wording on "strengthening operational, technical and institutional capacities for IWRM".

Component 2:

9. Please reformulate both the outcome and outputs of 2.1 to align with what is actually explained in the text of the component which would also align with GEF IW eligibility (which does not include local WASH services). The text explains that the GEF project will "increase water efficiency, quality and reuse, reduce both point and non-point sources of pollution and addressing both primary and emerging pollutants within and along the Ubangi basin" which supports water security of drinking water sources that the (PREDIR funded?) WASH program depends on. etc.

Outputs could include (taken from the PIF text): training on water use efficiency, quality and reuse and reduction on pressures on ecosystems; on cross-border trade of safe drinking water; pollution reduction from mining (and by the way for gold mining the support by the CW focal area and funds from Minamata should be explored) and joint monitoring of pollution.

10. Outcome 2.2 - please note that basic water sanitation and supply is not aligned with the International Waters Strategy.

11 . Outcome 2.3. - please reformulate to align with the IW strategy and a clear ToC. Interventions seem to be very scattered and lack focus to be likely to add up to a clearer outcome and impact on the river system.

Component 3:

12. KM efforts are appreciated as well as the South-South learning within the region as well as the Amazon. The formulation of the outcomes and outputs though are very generic and could basically be applied to any project. Please show how this works is based on stakeholders and actors in the involved countries. Please also consider collaboration and strengthening of existing Congo basin University cooperative networks.

13. Will the exchange with the Amazon involve to either advance or at least collate and analyze existing work on the Congo basin specific "tipping points" at which land-use change will irreversibly impact within-basin rainfall as well as the regional climate of neighboring countries?

14. M&E - please include the need for an MTR and TE/ICR.

(4/17/2025)

1. The PIF has been revised and the comment addressed - see previous question
2. The revised components indeed provide a better flow. Furthermore, the clear emphasis to strengthen capacities at CICOS is well noted and very much a gap that this project can and will now clearly address.
3. Noted. Addressed.
4. The revised text is a much clearer approach to support community based efforts in a participatory manner. Addressed.
5. Addressed in the revised component 2.
6. Comments i - iv have been addressed in the agency response and revised PIF. Please by endorsement more carefully use wording on gender and increasing female participation to not sound like a reverse discrimination (*"Especially, the quota of women participating in training initiatives will be deliberately increased to suppress that of males."*)
7. Response noted. Addressed.
8. Addressed in the revised component text.
9. - 11. Comments on previous component 2 have been addressed in the revised PIF.
12. and 13. Both of these points can be further elaborated during the PPG phase. Agreed.
14. Addressed.

Cleared

Agency's Comments

4/14/25

1. The ToC has been revised to link project actions to the barriers in the basin.
2. The project description has been revised. The original component 1 is now split into two components ? Component 1 is on cooperation mechanisms and component 2 is on technical capacity strengthening. Former component 2 is now component 3 and it focuses on demonstrating actions for effective cooperation building on the mechanisms and capacities in components 1 and 2.

3. The development of the TDA will be based on the SDAGE which has also been used to identify the support gap in the basin. The project acknowledges the TDA/SAP that have been undertaken in the wider Congo basin. This is narrated in Component 1.1 and its outputs 1.1.1 and 1.1.2.

4. The recommendation is adopted and explained in the introduction to Component 3. It is elaborated further in subsequent outputs.

5. As explained before, this original component has been split into two with one component (component 2) wholly dedicated to building capacity within CICOS, its subsidiary committees and other key stakeholders including non-state actors.

6. Outcome 1.2 has been reformulated and now focuses on gender issues.

(i) To prioritize gender mainstreaming all outputs emphasize the importance of women and youth. The monitoring and evaluation strategy for the project will also be gender sensitive and collect gender related indicators.

(ii) the phrase has been removed from the project description.

(iii) the original output 1.2.2 has been replaced by a new Output 1.2.4. which is designed specifically to integrate women into project activities.

(iv) A specific output 4.1.2. has been included in the project KM to broadcast the lessons learned in gender mainstreaming during project implementation.

7. This activity has been removed from component 1, so as not to create confusion with existing agreements. It was originally in Output 1.3.1. This has been replaced by a new Output 2.2.1 in which a regulatory framework is developed and submitted to the two countries for approval. (Also see earlier response to part 3, comment 3.)

8. Activity is reformulated in component 2 of the revised PIF.

9. This has been reformulated in component 3 to better align with the introduction and also show the direct linkages with the PREDIRE project.

The recommendations have been adopted and presented as outcome 3.2 and its outputs. However, support by the CW focal area has not been included.

10. Outcome 2.2 is now outcome 3.2. Basic WASH services have been removed from the new formulation and replaced with capacitation for participation in the operation and maintenance of installed infrastructure, in PREDIRE project supply chains, and the monitoring of navigation impacts.

11. Actions are focused on reducing river siltation, improving erosion control, combating deforestation and improving farming techniques that support sustainable basin resources management.

12. Component 4 outputs have been rephrased to reference the Ubangi Basin.

13. This aspect will be further elaborated during the PPG phase.

14. These are mentioned as part of outcome 4.2. of the PIF.

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

(3/12/25)

1. Please take a more differentiated look at PREDIRE to only count the efforts that directly align and support the project objective. Out of basin water transfer e.g. would not align.

2. Please update the table after responding to comments specifically on component 2.

(4/17/2025)

1. and 2. Update/revision noted. Addressed/cleared

Agency's Comments

4/14/25

1. A section on the synergies between the PREDIRE and the GEF project has been added as part of the project rationale. Non-complementary activities, such as the referred to water transfers, have been excluded.

2. This has been done. The revised table focusses on the complementarities between the two projects.

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

(3/12/25) The PREDIRE baseline project is an essential foundation on which the proposed GEF project is resting. Without the ongoing engagement and strengthening of the regional and national institutions the proposed GEF finance at this scale would not be viable.

1, Please answer the question if the implementing agency expects to play an executing role. The answer is currently blank.

2. During PPG please develop an approach on how to strengthen CICOS which currently has not very strong administrative and technical capacities, lack of funds, and limited country support.

(4/17/2025)

1. We note that there is a recurring problem with the portal to answer this question with yes/no. Nevertheless, the text clearly states that CICOS and national counterpart agencies will be the executing partners both for PREDIRE and the GEF finance., i.e. the implementing agencies will not have executing roles.

2. This is clearly addressed in the revised PIF.

Cleared.

Agency's Comments

4/14/25

1. The implementing agency does not expect to play an executing role.

2. This is noted and stated in the PIF.

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

(3/12/25)

The core indicators are extremely/too low for a project of this size.

(4/17/2025)

Noted and addressed.

Please verify the number of beneficiaries/CI 11 **during PPG** and differentiate between direct and indirect beneficiaries. The current number appears to include both.

Cleared

Agency's Comments

4/14/25

New figures have been proposed and the justification provided.

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

Secretariat's CommentsNA

Agency's Comments

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

(3/12/25)

1. Climate risk to the basin and project activities: please address in the context of climate impacts on the basin and mitigation measures of the project to address these.
2. Please reevaluate the risk rating of political and governance risks which is rated as low: (i) this does not align with the stated situation governance on national and regional levels is rather weak. (ii) Fragility and conflict risks may be more than just confined to just the Eastern Congo. (See also comments on the ESS screening)
3. Financial risks - please include the need for an exit strategy and need for a more stable funding of CICOS.

(4/17/2025)

Comments 1.- 3. addressed.

Please note and address the comment on ES risk. **The ES risks in the risk table should be consistent with the agencies ES screen which rates the risk as category 3/low. Please address.**

(4/18/2025)

The revised ES Screen is noted and ratings for Environmental and Social Risks in the risk table as well as the revised ES Screen are now consistent and ranked as moderate.

Cleared

Agency's Comments

4/14/25

1. The climate risks are elaborated in the rationale section of the PIF and climate resilience actions are mainstreamed in Component 3 of the PIF.
2. This has been modified. A moderate rating is proposed and explained.
3. The issue of sustainable funding is raised in outcome 2.1 and implied in Output 2.1.2 of the PIF.

4/18/2025

The ES risks in the risk table have been revised to be consistent with the agencies ES screen. The latter rates the risk as category 2/Moderate. An explanation for this rating was also added.

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

To be commented on after resubmission.

(4/17/2025) Yes, the synergies of the PREDIRE co-finance and GEF project have a considerable potential to strengthen CICOS and with that its role in regional cooperation as well as scale up on the ground activities through complementary actions.

Cleared

Agency's Comments

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

(3/12/25) Most of the effort is aligned with the IW strategy but parts of component 2 will need to express this much stronger as basic WASH provision is not aligned with IW (while of course very much needed at country and local levels).

(4/17/2025) Addressed.

Cleared

Agency's Comments

4/14/25

The component has been redesigned and the WASH components replaced. The link with the PREDIRE has also been presented more clearly.

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

(3/12/25) yes

Cleared

Agency's Comments

4/14/25

This is well-noted.

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 Not a direct activity of the project.

Agency's Comments

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments (3/12/25) Yes.

Agency's Comments

4/14/25

This is well-noted.

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

Secretariat's Comments(3/12/25) yes.

Agency's Comments

4/14/25

This is well-noted.

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 Comments

Focal Area allocation?

Secretariat's Comments(3/12/25) Yes

Agency's Comments

LDCF under the principle of equitable access?

Secretariat's Comments

Agency's Comments

SCCF A (SIDS)?

Secretariat's Comments

Agency's Comments

SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat's Comments

Agency's Comments

Focal Area Set Aside?

Secretariat's Comments

Agency's Comments

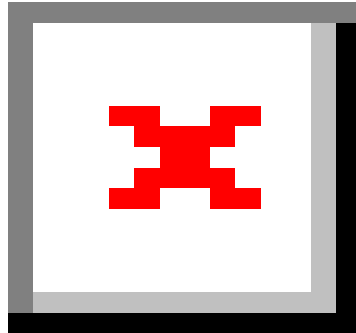
8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

(3/12/25)

1. The GEF Financing and PPG Agency Fee for IUCN in the LoE and in Portal (US\$ 240,063 and US\$ 6,002 respectively) are higher than those allowed of 9.0% (US\$ 227,429 and US\$ 5,686 respectively). Please ask adjust the figures in the Portal or get a new LoE that matches the figures in the Portal.

Please note: Whenever the new LoE comes and the project is resubmitted, we will review them and the Financial Tables.



(4/17/2025) The figures have been revised according to the comment.

(4/18/2025) These are also reflected in the revised LOEs.

Cleared

Agency's Comments

4/14/25

Figures have been recalculated, and new LoEs submitted.

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

(3/12/25)

1. The main co-finance from the PREDIR project is solid.
2. Country and CICOS co-finance will need to be confirmed during PPG.
3. Please add a co-finance commitment from IUCN (in-kind and or/grant).

(4/17/2025) Noted and please address by endorsement.

Cleared

Agency's Comments

4/14/25

1. This is well-noted.
2. Noted and will be elaborated during the PPG.
3. Noted and will be elaborated during the PPG.

Annex B: Endorsements

8.4 Has the project been endorsed by the country? (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

(3/12/25) It has been endorsed by DR Congo. The letter from CAR is missing and could not be obtained due to severe illness of the OFP and will be provided as soon as possible (as per informal communication by the agency).

(4/17/2025) The CAR letter has been submitted.

Agency's Comments

4/14/25

Both CAR and DRC LoE are provided with the revised project figures.

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

Secretariat's Comments

See above

(4/17/2025) Yes

Agency's Comments

4/14/25

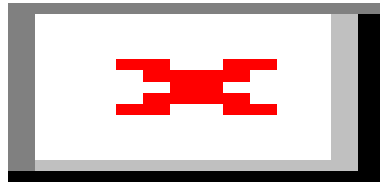
These have been uploaded.


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

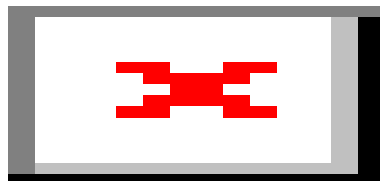
Secretariat's Comments

(3/12/25)

Please ask align the executing partners in the LoE with those in the Portal. The project execution arrangements will be reviewed in light of the final executing partners.



General Project information 			
Project Title:	Regional program for integrated water resources management and climate resilience in the transboundary basin of the Ubangi River between the Central African Republic (CAR) and the Democratic Republic of Congo (DRC)		
Region:	Regional	GEF Project ID:	11906
Country(ies):	Regional, Central African Republic, Congo DR	Type of Project:	FSP
GEF Agency(ies):	AfDB	GEF Agency ID:	
	IUCN		
Executing Partner:	CICOS (Commission Internationale du Bassin du Congo-Ubangi-Sangha), Ministry of Rural Development (DRC), Ministry of Development of Energy and Water Resources (CAR)	Executing Partner Type:	Others
	Ministry of Rural Development (DRC)		Government
	Ministry of Development of Energy and Water Resources (CAR)		Government



(4/17/2025) Both letters outline only the executing agencies on national level - Ministry of Rural Development (DRC), Ministry of Development of Energy and Water Resources (CAR). In both cases these will also cooperate with the Ministries of Environment and Sustainable Development. Both letters fail to mention CICOS as the executing agency on regional level.

Please provide either a revised LOE or at minimum an email from both OFPs confirming their support for CICOS as the regional executing entity. This email could also confirm the concurrence with the change in the project title at the same time.

Note: this will remain subject to review and confirmation for GEF policy adherence by the GEFSEC policy team , but given the upcoming deadline tomorrow we strongly suggest to secure an email from both OFPs.

(4/18/2025)

- The revised title is indeed indicated in the revised LOEs.

- We also note the immediate response via email from CAR to confirm their agreement with CICOS as the regional EA as well as the national counterpart agency EAs listed in the PIF. This email is noted as filed in the portal.

- We also note that you spoke with the DRC OFP and he verbally confirmed the same. The difficulty for the OFP to respond to your email while en route is noted and please send his written confirmation email as soon as you get it , i.e. upon his arrival in Brazil.

Preliminary cleared subject to receiving the email from the DRC OFP.

Agency's Comments

4/14/25

Yes they follow the correct format.

4/18/2025

A new signed endorsement letter was obtained from both OFPs supporting the title change. Despite the very challenging clearance deadline, a communication was sent to both OFPs to get their support for CICOS as the regional executing entity. The CAR OFP has replied in time to confirm his support for the designated executing agencies, including CICOS. We have managed to exchange with the DRC OFP over the phone but he is currently travelling to Brazil and will only be able to react after touchdown upon accessing his inbox.

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 Comments

Annex C: Project Location

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

Secretariat's Comments(3/12/25) Yes.

Agency's Comments

4/14/25

This is well-noted.

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

(3/12/25)

We note that AfDB attached the Preliminary safeguard screening and the Project's environmental and social risk is classified as Low. However, both Central African Republic and Democratic Republic of Congo are listed as "conflict" in the World Bank Group's FY25 List of Fragile and Conflict-affected Situations. In addition, the PIF recognized risks related to "the development of tensions leading to inter-community conflicts in the region" and impacts on gender related to fragility and conflict. However, these social risks are not recognized in the Preliminary safeguard screening. Furthermore, the project emphasizes importance of engagement with IPLCs, however, there is no consultation with IPLCs at this stage.

- i. Please elaborate further potential risks and impacts related social conflicts and risks for the most vulnerable communities including women, youth, and Indigenous Peoples and Local Communities (IPLCs) in FCS settings that the project may trigger in the Preliminary safeguard screening.
- ii. Please also provide information of how conflict analysis is integrated into the project design to avoid and mitigate risks related to conflict and fragile situations.
- iii. Please provide information of consultation with IPLCs.

(4/17/2025)

We understand that given the remoteness and size of the area detailed consultations with IPLCs will only take place during the PPG. We also note that the **overall risk rating in the risk table has been set to moderate given the fragile situation and also capacity constraints.**

Please note though that there is currently an inconsistency between the ES screening as category 3/low and the ES rating in the risk table where Environmental and Social Risks are rated as moderate which we agree with.

Please assure that there are consistent ES ratings of the ES Agency Screen and the Environmental and Social risk rating in the risk table.

(4/18/2025) Addressed (see also earlier comment with regards to the risk table).

Cleared.

Agency's Comments

4/14/25

A detailed safeguards screening will be undertaken during the PPG phase. It has however been upgraded to 'medium' for this PIF submission.

4/18/2025

The ES risks in the risk table have been revised to be consistent with the agencies ES screen. The latter rates the risk as category 2/Moderate. An explanation for this rating was also added.

Annex E: Rio Markers

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

Secretariat's Comments

(3/12/25) CCM is marked as "1" but no Core Indicator I target provided. This needs addressing.

(4/17/2025) CCM set to "0". Addressed,

Agency's Comments

4/14/25

This has been revised.

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments(3/12/25) Yes

Agency's Comments

4/14/25

This is well-noted.

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 Comments

9 GEFSEC Decision

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

Secretariat's Comments

(3/12/25) The PIF requires revisions. Please address the comments provided.

Please do not hesitate to reach out to GEFSEC in the next days for any exchange on the comments which may aid revisions.

(4/17/2025) Please address

- Comments on risk table (Environmental and Social Risk) and the ES screen rating consistency

- Email (or revised LOE) from both OFPs to:

- > confirm the executing agencies listed in the PIF, specifically CICOS as the EA on regional level

- > confirm their agreement with the revised title.

(4/18/2025) The project is preliminary technically cleared subject to receiving the email from the DRC OFP to confirm his agreement with all executing agencies listed in the PIF including CICOS as the EA on regional level.

With this condition, the project is recommended for inclusion in a future work program.

Agency's Comments

4/14/25

The PIF has been revised. The rationale and project descriptions sections have been reorganized. The components have been reorganized.

4/18/2025

- The ES risks in the risk table have been revised to be consistent with the agencies ES screen. The latter rates the risk as category 2/Moderate. An explanation for this rating was also added.

- A new signed endorsement letter was obtained from both OFPs supporting the title change. Despite the very challenging clearance deadline, a communication was sent to both OFPs to get their support for CICOS as the regional executing entity. The CAR OFP has replied in time to confirm his support for the designated executing agencies, including CICOS. We have

managed to exchange with the DRC OFP over the phone but he is currently travelling to Brazil and will only be able to react after touchdown upon accessing his inbox.

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

Secretariat's Comments

- 1) Please ensure to include relevant gender-specific indicators in the RF;
- 2) In the development of the Gender Action Plan, please include specific budget lines, as appropriate and plans for monitoring and reporting on the GAP.
- 3) Under M&E, please reflect that reports submitted (MTR and TE) include gender-specific results and progress in the implementation of the gender action.
- <<Previous comment 4 was deleted as the strengthening of CICOS is addressed in component 2 of the revised PIF>>
4. By endorsement, please move the KM efforts, including exchanges with Amazon, IW;LEARN participation and the regional partners forum out of M&E and into a sub-component.
5. Country and CICOS co-finance will need to be confirmed during PPG.
6. Please add a co-finance commitment from IUCN (in-kind and or/grant).

Agency's Comments

4/14/25

The suggestions are noted and will be considered during the PPG phase.

Review Dates

	PIF Review	Agency Response
First Review	3/12/2025	3/20/2025
Additional Review (as necessary)	4/17/2025	4/18/2025
Additional Review (as necessary)	4/18/2025	

PIF Review

Agency Response

Additional Review (as necessary)

Additional Review (as necessary)