

Towards a Sustainable City through Energy Efficiency in Kairouan

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID 11040 **Countries** Tunisia **Project Name** Towards a Sustainable City through Energy Efficiency in Kairouan **Agencies UNDP** Date received by PM 2/28/2023 Review completed by PM 10/30/2023 **Program Manager** Filippo Berardi **Focal Area** Climate Change **Project Type**

PIF □ CEO Endorsement □

Part I? Project Information

Focal area elements

1. Does the project remain aligned with the relevant GEF focal area elements as presented in PIF (as indicated in table A)?

Secretariat Comment at CEO Endorsement Request

Cleared. 10/30/2023

10/27/2023: PPO Comments

1. Cleared.

2.a: Thank you. While the inclusion of UNDP as "Other Executing Partner" is noted on the Prodoc and CEO ER in word format, this is still missing on the on line version which is the one that will be circulated to Council. Please reflect that also in the portal entry.

2.b (1 and 2): cleared.

09/26/2023: PPO comments

1. Please consider inserting the geolocation in the specific entry form in the portal. Please follow the user manual for reference: Geocoding User Guide.docx (live.com): https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fgefportal.worldbank.or g%2FApp%2Fassets%2Fgeneral%2FGeocoding%2520User%2520Guide.docx&wdOrigin=B ROWSELINK

2.a: The OFP from Tunisia signed a request of support letter for UNDP to carry out executing services/activities. Therefore, UNDP co-executes this project. Please include UNDP as other executing entity. Also please note that all Budget Tables (in CEO Endorsement Request, in ProDoc, and the excel file appended to the Documents? tab) should reflect the activities and

correspondent costs that UNDP will carry out, and indicate UNDP as executing entity for those amounts.

- 2. The execution services provided by UNDP are expected to include:
 - Finance: Payments process; creation of vendor forms; issuing cheques; adjustment
 of financial transaction; monitoring and reviewing financial transaction; managing
 vendor profiles; reimbursement of travel expenses.
 - Procurement of goods and services: Review of the terms of reference; preparation
 of bidding documents; advertising, bidding evaluation, contract issuing and
 management; issuing the Purchase orders.
 - Travel: Travel Management: travel authorization; ticketing, settlement/reimbursement of travel claims.
 - Human resources: Staff selection and recruitment process (Advertising, Long/Shortlisting, Interviews), Staff benefits administration and management, recurrent personnel management services: staff Payroll, banking administration and management
- 3. The execution services to be provided by the Ministry of Environment are expected to include:
 - Project planning, coordination, management, monitoring, evaluation and reporting.
 This includes providing all required information and data necessary for timely,
 comprehensive and evidence-based project reporting, including results and financial
 data, as necessary. The Implementing Partner will strive to ensure project-level
 M&E is undertaken by national institutes and is aligned with national systems so
 that the data used and generated by the project supports national systems.

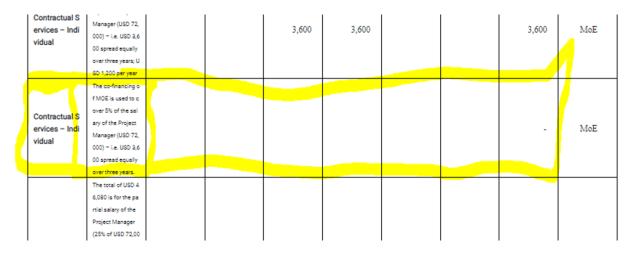
- Overseeing the management of project risks as included in this project document and new risks that may emerge during project implementation.
- Financial management, including overseeing financial expenditures against project budgets.
- Approving and signing the multiyear work plan.
- · Approving and signing the combined delivery report at the end of the year; and,
- Signing the financial report or the funding authorization and certificate of expenditures.
- Execution activities, including those provided by UNDP will be described in detail in the GEF CEO Endorsement/Approval request and accompanying project/program documents, including the project/program budget.

Sincerely,

Sabria Bnouni

GEF Operational Focal point

- 2. b.1 This is cleared for the PM. However, there are no technical staff identified in the TOR for the Project Assistant, so either include them in the TOR or remove the relative amounts from the project budget charged to components.
- 2. b.2: Please note there are some rows in the project budget of the CEO ER (annex E) that do not include any amount, while corresponding amounts are indicated in the written description. See for instance:



- 3. Cleared.
- 4. Cleared.

PPO Comments:

- 1. <u>Geographic location data</u>: In Annex D on Project Map and Coordinates, please consider inserting the geographic location of the site directly under the dedicated data entry field in the portal.
- 2. Operations:
- a. As UNDP is providing some execution support services, please add UNDP under the Other Executing Partner of the Project Information section.
- b. Budget table: Project Manager and Project Associate/Administrative Assistance are charged to both project components and PMC, please consider to charge to PMC and proportionately between GEF financing and co-financing.
- 3. <u>Gender:</u> On references to gender-disaggregated data, please ask the Agency to clarify if it will indeed collect or monitor data on different genders (that means, more than women-men

and include LGBTQI+). If the intent is to collect data disaggregated as women-men? please ask them to use sex-disaggregated instead of gender-disaggregated.

4. <u>Knowledge Management & Stakeholders Engagement:</u> The project document includes a set of knowledge management and communications activities, especially as part of Component 3, including knowledge and communications products to share key messages, experiences, training, workshops, a data management system, online connection to PANORAMA partnership and dissemination of lessons learned. A timeline and budget for KM&L activities have been provided in the KM section mentioned; and the project?s results framework lists targeted KM&L deliverables. But no such information is provided for the implementation of a communication plan.

The project document does include a reference to a communication plan as part of the project?s Stakeholder Engagement Strategy; but the Prodoc does not include Annex 10-Stakeholder Engagement Plan; so it is not clear what this communication plan entails. Thus, the agency is requested to provide the communication plan for the project (or Annex 10? Stakeholder Engagement Plan) as well the timeline and budget for the implementation of the communication plan.

Cleared

03/17/23, FB

yes, the project remains aligned with relevant FA elements (CCM 1-3)

Agency Response

- 1. The geographic location of the site has been inserted in the portal.
- 2.(a) The UNDP is not executing any activities. Rather it is only providing procurement and payment services under the assisted NIM modality. Project execution remains fully with the Ministry of Environment. Hence, the proposed change has not been carried out.
- (b) Budget table: Two clarifications are provided to clarify the approach used for budget allocation regarding the salaries of the project management staff. First, it is pointed out that 34% of all salaries are covered by government cash co-financing, triggered mainly by the insufficiency of funds available under PMC. Second, it is the salary of the Project Manager that is imputed to project components using GEF funding to the tune of 35% of the total PM salary (i.e. USD 25,200). Of this, USD 14,400, USD 7,200 and USD 3,600 are allocated under components 1, 2 and 3, respectively. This is justified because the PM will also carry out

technical duties as made explicit in the ToR given in Annex 9. The allocation of the PM?s salary to the three components reflects the difference in time inputs for technical work associated with the three components. These supplementary explanations have been included in the budget notes (highlighted in green) related to project staff salary in Section IX (Total Budget and Work Plan) in the ProDoc ? i.e. budget notes 2,9 and 20 for salary covered under project components using GEF funding and budget notes 6, 14 and 29 for salary covered using MOE cash co-financing.

- 3. Gender: The distinction between gender- and sex-disaggregated indicators is duly noted. As far as data collection is concerned, ?gender? has been replaced with ?sex? in order to be aligned with the Project Results Framework, as well as the Gender Action Plan (Table 17 in the ProDoc and Table 16 in the CEO ER). The Project Results Framework and the Gender Action Plan use indicators and targets defined in terms of men/women (or male/female). Accordingly, Table 3 in Annex 12 in the ProDoc has been changed accordingly with changes in all documents highlighted in green.
- 4. KM & Stakeholder Engagement: The comment of PPO is duly noted. Annex 10? Stakeholder Engagement Plan has now been re-submitted to the GEF portal, as part of the CEO endorsement request document. It is pointed out that the Stakeholder Engagement Plan includes a timeline for its implementation (Table 6 in the SEP), as well as a section on ?Resources and Responsibilities?, including a SEP budget in Table 7.

por	nse:	
1.	Thank you for sharing the Geolocation user guide. The geolocation is reuploaded on the Portal following the guidance shared.	Portal
2.	a. We understand GEF's request. As explained earlier, although UNDP is providing execution services, these are not direct execution of project activities on the ground. Rather, UNDP is only providing execution support services to the executing entity, the Ministry of Environment, by providing procurement, HR and payment services under the assisted NIM modality. Project execution remains fully with MOE through the Project Management Unit.	Prodoc p. 1 Prodoc, TBWP
	That said, given the request from GEF, UNDP is indicated as "other executing entity" on <u>Prodoc</u> and CEO Endorsement Request. UNDP is also indicated as EE in the Budget Tables where appropriate as <i>UNDP</i> (to provide support service to <u>MoE</u>).	73 86.
	b.1. The TOR for the Project Assistant is revised to include the provision of technical support for the implementation and monitoring of the project. This technical support is estimated at roughly 15% of the PA's working time, therefore, only this portion of the salary is charged against the components. 85% of the salary is charged against the PMU budget.	Prodoc, p. 140
	b.2. Budget table is revised to indicate the correct amount.	Excel sheet bu
		Annex E
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Project description summary

2. 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 **Item cleared.**

Component 1. cleared

Output 1.2: cleared.

output 1.6: cleared

component 2: ok

03/17/23, FB

Component 1:

1. The barriers listed in Table 4 do not mention the lack of (up-to-date) building regulations for the most of the cities building stock, which could be argued to be one of the main barriers preventing the adoption of energy efficiency in buildings and public lighting.

Output 1.2:

- 1. An update to the RTNB is proposed as part of output 1.2, through the ?set-up of a multi-institutional mechanism? to coordinate stakeholders for the review and update. As noted at PIF stage, updating the RTNB periodically and through the use of a self-ratcheting mechanism is very important both at city and national level. The fact that the pilot program will use the EcoBat which has stringent requirements (@ Class 3 level), does not impact the need to ensure output 1.2 is reached. Please consider including a stronger indicator for this output in the result framework, that goes beyond the "number of municipal staff with competencies to apply operational guidelines for enforcement of RTNB".
- 2. As part of the update of the RTNB, not only should the increased level of ambition (stringency) be increased from the 2010 version, but also the scope of application of the RTNB, since it is noted that only 5% of the total buildings area is subject to the RTNB. Please clarify what the project will do to this point.
- 3. The pilot implementation as per output 1.6 will happen in a municipal building. While this is ok, municipal buildings may have a good demonstration potential, but have a very small overall emission footprint compared to residential, commercial and industrial ones (figure 1). please confirm if/that the updates to the RTNB will also cover the other types of buildings.

Output 1.6:

1. At the moment it is difficult to estimate the level of ambition of the proposed pilot intervention in the public office building. The energy class remains at level 3: please provide more context to contextualize the proposed intervention vs. the status quo.

a: How many other buildings are there in Tunisia with this class? What would be the additional estimated cost to build a building qualifying for the most efficient class (Class 1), vs. the one that is being proposed for the pilot investment?

b: the \$314k that are to be invested in the pilot represent approx 1/3 of the total GEF financing. Please provide estimates of how this financing is used to cover for the <u>incremental</u> cost of the building works. How much would the works cost if the building was built according to Class 5 specification (baseline)? What is the incremental cost of the works to improve efficiency to level 3?

c: As also noted at PIF level, the level of ambition of the concept/pilot building remains low. It is unclear and not explained why other efficiency measures are not planned for in the building in addition to the thermal insulation feature. In table 4, under Barrier 2, it is stated that ?project could be developed around the proof-of-concept energy efficient building (building envelope using local materials, energy efficient equipment, solar thermal heating etc?)?. The current proposal only suggests improvements to the building envelope (fa?ade and windows, see tables 7 and 8). As the project is developed around *one single building*, the EE measures piloted should be more ambitious and could indeed include efficient HVAC systems, other passive measures such as natural ventilation, and solar thermal and/or PVs. Roof-top investments are considered outside scope, referring to financial crisis (Annex B, Q.2). If not feasible at this stage, could the building be designed so this the design be added later on?

Component 2? Energy efficient public lighting

1. The update since PIF stage to remove the focus on intelligent public lighting system for the remote management of public lighting makes sense, as smart metering systems require capacity to use and inform operations which many cities also in the global North struggle with. The reference to this should be removed in para 33 - Output 2.3.

Agency Response Component 1:

Barrier 4 in Table 4 has been updated by including the following text? There are also two associated causes for the non-adoption of energy efficiency in buildings, namely: (i) the lack of up-to-date buildings energy codes, and (ii) the limited scope of application of the existing legislation - i.e. the RTNB applies to a limited set of building types.?

Output 1.2:

- 1. Following GEF comments, indicator 3 in the Results Framework has been changed by adding a stronger indicator, namely sub-indicator ?3(a) Number of updated RTNB and associated regulations?. The initial indicator has been retained as indicator 3(b) with the word ?updated? added in front of RTNB.
- 2. Yes. The scope of application will also be reviewed under Activity 1.2.3 by making the legislation more stringent ?in terms of increasing the scope of types of buildings covered?.
- 3. Yes. The scope of the application of the updated RNTB will be applicable to other building types and not limited to municipal buildings. This is showcased in the project design by the inclusion of the private sector commercial building in Activity 1.6.3 to get the ECOBat label accreditation.

Output 1.6:

- 1. a. In response to GEF comments, the following text has been added in paragraph 29: ?Further, the proof-of-concept will also make an application of the ECOBat label. The ECOBat energy label is a voluntary label designed to promote the adoption of building energy codes beyond the minimum energy performance standards prescribed in the RTNB. In its inception form, the ECOBat label is applicable to the following building types (same as those to which the RTNB is applicable: hotels, health institutions, commercial (office) buildings, and residential apartments with each type of building scored across three indicators, namely: (i) building envelope;(ii) electrical equipment; and (iii) management of resources (e.g. water, waste, health and project management).[1]1 The application and demonstration of the ECOBat label was initiated in 2022 through a pilot project involving two publicly-owned buildings, namely: (a) the M?diterran?enne-Soukra health clinic, and (b) the municipal building in M?denine. The two buildings are expected to be accredited at ECOBat label level 3 in order to demonstrate the application of the scoring and labeling system proposed in ECOBat.?
- 1. b. The estimation of the cost of GEF investments has been carried out at the following text added to Output 1.6 (Activity 1.6.2):

?The building envelope energy efficiency gains that will ensure Level 3 classification for the G3 and G4 will be obtained through the interventions listed in Table 7 and Table 8. An estimation of the cost of the energy efficiency interventions has been carried out and the results are shown in Annex 14 (Part D). The results are summarised in Table 9. The envelope insulation for G3/G4 will be inside (interior insulation), whereas for G/G1/G2 there will be retrofitting through exterior fa?ade insulation that is more costly. The total cost of interventions for envelope insulation is estimated at USD 293,587.?

Table 9. Estimation of incremental costs of building envelope energy efficiency

	Walls (USD)	Openings (USD)	Roof (USD)	
G3 + G4	20,857	15,258	16,698	

G+G1+G2 (retrofit)	217,889	22,887	Not applicable
Total (USD)	238,746	38,145	16,698

1. c. The level of ambition of this project is set to a realistic level, knowing that it is an MSP with a small budget. However, discussions with the municipality has shown their willingness to go further and to install rooftop PV in the future (also the building is already designed to use high-efficiency air conditioners and LED lighting). So the following text has also been added to Activity 1.2.6:

?Although the GEF investments will not be used to install rooftop solar PV, a budget of USD 20,869 has been earmarked for (i) preparation of the insulated roof for roof-mounting structure; and (ii) designing the PV systems for achieving electricity autonomy of the municipal building at Keblia?

Component 2? Energy efficient public lighting

- 1. Paragraph 33 has been revised by deleting reference to intelligent lighting system. The type of LED used has been qualified ?with capacity for upgrade to an intelligent system?.
- 3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?

Secretariat Comment at CEO Endorsement Request n/a

Agency Response

Co-financing

4. 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 **Item cleared.**

06/21/23, FB

cleared

03/17/23, FB

- 1. UNDP cofinancing: the letter should specify (i) the type of cofinaning and (ii) the period over which the co-financing is provided. Also, please clarify what is meant by "UNDP contribution comes from the *already committed* funds by UNDP SGD Climate Facility regional project".
- 2. Letter representing evidence of co-financing from Agence Nationale de Maitrise de l?Energie (ANME) and Sghaier Property Developer are not attached to the CEO ER nor are found in the document section. Please provide such evidence.

Agency Response

- 1. A new letter of UNDP cofinancing has been issued to provide more details concerning the UNDP SDG Climate Facility regional project, including type of co-financing and period of c-financing.
- 1. 2. The letter of co-financing from private developer is provided. Since it is the property developer that accesses the financial incentive from the Energy Transition Fund managed by the ANME, the letter of co-financing combines the debt/equity co-financing of the developer and the grant accessed from the ETF. Please also note that the name of the private company is ?the Proportion of Gold?, and it is managed by Mr Sghaier. In the previous submission, the name of the manager was confounded as the company name. The change has been carried out throughout the CEO ER and the ProDoc.

It has also to be noted that as per UNDP Policies and Procedures, a Private Sector Due Diligence (reputational risk assessment) has been conducted.

GEF Resource Availability

5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?

Secretariat Comment at CEO Endorsement Request Cleared.

03/17/23, FB

Yes, resources are available.

Agency Response

Project Preparation Grant

6. Is the status and utilization of the PPG reported in Annex C in the document?

Secretariat Comment at CEO Endorsement Request Cleared.

06/21/23, FB

It is noted that a large share of the PPG funds are still unspent, but committed. They will have to be used within 1 year from the date of the CEO Endorsement, or returned to the GEF Trustee thereafter.

03/17/23, FB

The Agency has provided information on the status of utilization of the PPG resources. However, there is no detailed funding amount of the PPG activities financing status, as required by the CER ER template.

1. Please provide a more granular breakdown, by category of spending.

Agency Response

The expenditure table in Annex C has been updated with more granular data.

PPG Grant Approved at PIF: USD 50,000					
Project Preparation Activities Implemented	GETF/LDCF/SCCF Amount (\$)				
	Budgeted Amount	Amount Spent to date	Amount Committed		
Component A: Preparatory Technical Studies & Reviews &	42,000.00	15,878.50	26,121.50		
Component B: Formulation of ProDoc					
1. International Consultants	32,031.00	12,853.05	19,177.95		
- International Project Development Specialist (PPG Team Leader)	28,490.00	11,525.10	16,964.90		
- Gender Specialist	3,541.00	1,327.95	2,213.05		
- Social and Environmental Safeguard Specialist	-	-	-		
2. Local Consultants	5,000.00	2,056.45	2,943.55		
- National Project Development Specialist	5,000.00	2,056.45	2,943.55		
3. Travel	2,469.00	969.00	1,500.00		
4. Audio Visual & Print Production Costs	2,500.00	-	2,500.00		
Component C: Validation Workshop (trainings and workshops)	8,000.00	-	8,000.00		
Total	50,000.00	15,878.50	34,121.50		

Core indicators

7. Are there changes/adjustments made in the core indicator targets indicated in Table E? Do they remain realistic?

Secretariat Comment at CEO Endorsement Request Cleared.

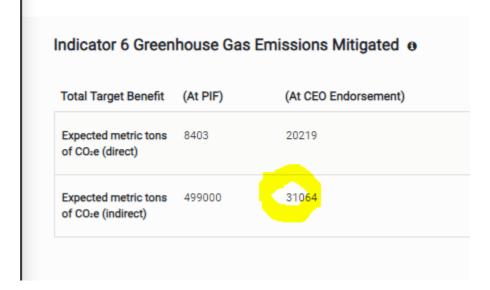
07/24/2023, FB

1, 2, 3 cleared.

06/21/23, FB

- 1. cleared.
- 2. The indirect emission reductions inserted in the portal are still only 31,064 tons, while they should be 82,409tons (equal to: 31,064 + 36,796 + 14,549)
- 3. cleared.

Core Indicators at CEO Endorsement (CEO)



03/17/23, FB

The ex ante estimate for GHG emission reductions is improved since PIF. However, please note:

- 1. the emission reductions to be accrued through the enhanced application of the RTNB were obtained at PIF level considering only 6 municipal buildings, and would result in 8,400 tCO2e. Since now we are expecting approximately 20k tCO2e, does that mean that there is only a total of approx 14-15 buildings that will see increased enforcement and application of the RTNB? Please clarify, as the number seem very low. (maybe it is only considering public buildings? But the RTNB should apply beyond public buildings, correct?).
- 2. There are some inconsistencies between Table 11 and the Core Indicator Table in the portal. It seems that the post-project direct and the bottom up indirect have been omitted in the cumulative portal entry. Please amend (including the PRF):

Table 11. Summary of project-related dir	rect and indirect emiss	sion reductions.		
All Components	Cumulative			
	Total	2023-2026	2027-2046	
Direct Electricity Savings (MWh)	45,232	4,142	41,090	
Direct Natural Gas Savings (GJ)	0	0	0	
Direct (District) Heat Savings (GJ)	0	0	0	
N/A	0	0	0	
Direct Total Energy Savings (GJ)	162,836	14,911	147,925	
Direct GHG Emission Savings (tCO2)	20,219	1,851	18,367	
Direct Post-project GHG Emission Savings (tC02)	36,796		36,796	
Indirect Bottom-up Emission Savings (tCO2)	14,549		14,549	
Indirect Top-down Emission Savings (tCO2)	31,064		31,064	

Total Target Benefit	(At PIF)	(At CEO Endorsement)	(Achieved at MTR)	(Achieved at TE)
Expected metric tons of CO ₂ e (direct)	8403	20219	0	0
Expected metric tons of CO ₂ e (indirect)	499000	31064	0	0

3. Number of beneficiaries: Is it reasonable to assume that all 187,000 people in Kairouan are direct beneficiaries, given the limited scope of buildings covered by the project? Lamp

changes for public lighting are for cost savings and not proposed to expand illuminated areas. please consider refining (and explaining) the methodology used.

Agency Response July 6, 2023:

Response:

Thank you. The number is adjusted on the GEF portal to be 82,409 tons instead of 31,064.

1. The calculations at PPG phase have been improved not by using the number of municipal buildings but rather using an extrapolation of the historical data of all buildings that are subject to the RTNB. This is shown in Table 14.A.5 in Annex 14 in the ProDoc and reproduced here. Using these figures, the calculation (contained in the Excel Tool accompanying the ProDoc) proceeds as follows:

?Accordingly to the existing energy building code, the minimum requirement in terms of energy consumption is equivalent to Class 5 of the ECOBat label? i.e. middle of the Class 5 band or 110 kWh/m². It is know that the RTNB is not enforced in the baseline, and discussions with the technical staff of the municipality, Tunisian Green Building Council, and the Association of Architects has revealed that energy use in existing buildings would be in the Class 7 band. Adopting a conservative approach in order not to overestimate GHG emission reductions, the lower end of the band is used in calculations? i.e. baseline electricity consumption is 150 kWh/m². With institutional capacity building under Output 1.1 and Output 1.2, it is expected that the municipality will be able to increase enforcement by 40% (of total area of building subject to RTNB) in the year 2024; 65% in 2025; and fully as from 2026.?

Table 14.A.5. Area of buildings that are subject to RTNB, 2010-2019.

	Habitation collectif, m2	Hab Col critere EPEBN, m2	Bureau, m2	Bureau EPEBN, m2	Hat_Bur,m2	Hab+Bur EPEBN, m2
2010	97,440	12,960	33600	39,600	131,040	52,560
2015	101920	12,960	5880	7,920	107,800	20,880
2019	104160	12,960	8400	9,900	112,560	22,860
_	Habitation collectif, m2	Hab Col critere EPEBN, m2	Bureau, m2	Bureau EPEBN, m2	Hat_Bur,m2	Hab+Bur EPEBN, m2
2010	97,440	12,960	33600	39,600	131,040	52,560

5880

8400

7,920

9,900

107,800

112,560

20,880

22,860

.

2015

2019

101920

104160

2. The inconsistency has been changed and the correct number used in the portal.

12,960

12,960

3. The municipal building in Keblia and the eight (8) axes that will benefit from GEF investments will serve and benefit all citizens who fall under the municipal jusrisdiction. Since, at least, the 8 road axes are so central to the city access and mobility, it is assumed that the justification is reasonable. The methodology is based on data on traffic count and an estimate of road users who travel on foot and by bicycle. It has been estimated that 107,657 persons use the road axes on a daily basis. It has been argued that it is realistic to assume that the road users would comprise two cohorts, namely regular users and ad hoc users. Since the ad hoc users are varied over a one year period, the number of distinct persons using the axes will be higher than 107,657. Given the fact that the project beneficiaries will also include inhabitants who use the public services offered in the municipal building in Keblia, it is safe to consider the total population of the City of Kairouan as project beneficiaries? i.e. 187,000 persons from the latest statistics of the population that live within the municipality?s geographical jurisdiction.

Based on the suggestion of GEF Sec, a more granular analysis of number of beneficiaries has been carried out using the number of persons who use the different road axes. The public lighting component of the project has been used here since it reaches more beneficiaries. The details of the methodology are given in a new Part C in Annex 14 of the ProDoc.

Response:

2. PIMS 6686 Tunisia Towards Sustainable cities - Responses to GEFSec Comments _FINAL 27 June

Thank you. The number is adjusted on the GEF portal to be 82,409 tons instead of 31,064.

	Habitation collectif, m2	Hab Col critere EPEBN, m2	Bureau, m2	Bureau EPEBN, m2	Hat_Bur,m2	Hab+Bur EPEBN, m2
2010	97,440	12,960	33600	39,600	131,040	52,560
2015	101920	12,960	5880	7,920	107,800	20,880
2019	104160	12,960	8400	9,900	112,560	22,860

Part II? Project Justification

1. Is there a sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?

Secretariat Comment at CEO Endorsement Request Cleared.

03/17/23, FB

Yes, there is a good elaboration of the problems, causes and barriers.

Agency Response

2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?

Secretariat Comment at CEO Endorsement Request Cleared.

06/21/23, FB

03/17/23, FB

1. the baseline scenario presented focuses exclusively on municipal buildings, which represent only a very small -albeit visible- portion of the existing and prospective building stock in the selected city and, more broadly, in Tunisia. This section would benefit from some additional language to indicate why municipal buildings were selected as the focus of the project, and make a link to the components of the project that are designed to leverage the demonstration effect, to ensure that the impact of the project goes beyond this small subset of buildings.

Agency Response

Paragraph 11 has been extended with the following justifications (given here in abridged form):

?Given the low application of the RTNB, and given the central role that the Municipality plays in the issuance of building and occupancy permits, it has been deemed suitable to use a municipal building as baseline project for energy efficiency enhancements using GEF financing. There are several reasons for this, namely: (i) interventions in a municipal building will be advantageous for the parallel capacity strengthening of the enforcement capacities of municipal staff because of easy access to the building compared to the case of a non-municipal building wherein permissions would be required (Output 1.1); ?.. (v) the selection of a municipal building for GEF investments does not exclude the participation of a private sector project (?the Proportion of Gold? ? Activity 1.6.3) for the adoption of the ECOBat label. Finally, the municipality may also be more open for using locally-fabricated bricks in the construction of the municipal building, albeit on a limited scale, as part of the government responsibility for protecting local heritage. The scaling up of the results of the project will include a wide range of building types, over and above municipal/governmental buildings (Output 3.4).?

3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?

Secretariat Comment at PIF/Work Program Inclusion Cleared.

03/17/23, FB

Several comments were included above in this review sheet regarding the proposed outputs.
Agency Response
4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?
Secretariat Comment at CEO Endorsement Request Cleared.
03/17/23, FB
The project is well aligned with the CCM focal area.
Agency Response
5. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?
Secretariat Comment at CEO Endorsement Request Cleared.
03/17/23, FB
the incremental reasoning is well described.
Agency Response
6. Is there further and better elaboration on the project?s expected contribution to global environmental benefits or adaptation benefits?
Secretariat Comment at CEO Endorsement Request Cleared.
03/17/23, FB
please refer to the comments on core indicators included above in the review sheet.

Agency Response

7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?

Secretariat Comment at CEO Endorsement Request Cleared.

21/06/23, FB

03/17/23, FB

1. Potential to scale up should be better elaborated. Particularly we suggest to be more explicit in explaining how the prospective revision of the building energy code will apply beyond the small group of municipal buildings, it is not clear in the document that this is the intention and how this will be operationalized/ensured.

Agency Response

The situation has been clarified to be in line with the response to a similar comment made regarding Output 1.2 above. The following text has been added to justify scaling up of project results.

?The UNDP-GEF project will ensure that a mechanism will be put in place for the regular update of the RTNB and accompanying regulations? i.e. racheting process - so that building energy codes will be updated to take into account best available technologies. The revision of the building energy codes will also extend the scope of application of regulations so that a larger cohort of building types (beyond the current restriction to commercial buildings and apartment blocks) that will energy a wider uptake of energy efficiency in buildings. ?.. The eventual outcome is expected to be larger global environmental benefits accruing from the application of more stringent building energy codes to a wider range of building types, as well as shifting public lighting using LEDs.?

Project Map and Coordinates

Is there an accurate and confirmed geo-referenced information where the project intervention will take place?
Secretariat Comment at CEO Endorsement Request Cleared.
03/17/23, FB
Maps are included.
Agency Response
Child Project
If this is a child project, is there an adequate reflection of how it contributes to the overall program impact?
Secretariat Comment at CEO Endorsement Request N/A
Agency Response
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.
21/06/23, FB

04/08/23, PPO

A stakeholder engagement report and plan is included in the document section and as an annex to the ProDoc, which includes details of the people/organizations consulted during project design. The project SEP also outlines important roles and responsibilities of the various stakeholder groups. It further states that associations/ Civil Society Organizations will play a key role in communicating with local citizens on relevant aspects of the project. It does however do not provide any details of these associations and CSOs.

1. If possible, the Agency should provide the names of the associations/CSO that are expected to play a specific role in the implementation.

Agency Response

The information is already contained in the SEP (Annex 10 in the ProDoc). The names of the associations/CSO are given in Table 13 that already indicates the outputs in which the associations/CSOs will be involved. Hence, the field for Associations/CSO in Table 13 has been updated with:

?The Associations/CSO that will participate in project implementation are: Association des Bassins des Aghlabides des Sports pour Tous (ABAST); Association des jeunes et sciences; Association de Protection de la Nature et de l?Environnement? Kairouan (APNEK); Association de Sauvegarde de la M?dina de Kairouan et Conservateur de mus?e de Rakkada.?

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.

03/17/23, FB

A gender gap analysis and gender action plan are included as annex 10 of the ProDoc in the portal document section, and main key points are included in the CEO ER.

Agency Response

Private Sector Engagement

If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?

Secretariat Comment at CEO Endorsement Request Cleared.

21/06/23, FB

03/17/23, FB

1. the section remains very short, and needs more details on how members of the private sector associations (particularly TGBC and the Association of Architects) were consulted at design stage what their contribution to the project will be. We suggest to include the details that were included in the stakeholder engagement plan into this section also, so this information is available to the reader of the CEO ER.

Agency Response

The information regarding private sector engagement contained in the SEP have been included in Section 4 of the CEO ER by formulating a new paragraph 48. The information is taken from the SEP (Annex 10 in the ProDoc). The change carried out is shown in condensed form as:

?Members of the TGBC and the Association of Architects are private sector operators in the construction industry. ??. The TGBC is the local chapter of the Green Building Council that supports the development of green buildings, and sustainable communities and cities in Tunisia. It has a strong pedagogical approach of coordinating public and private stakeholders and providing technical support. ??. In turn, the Association of Architects plays an important role in the entire value chain for building construction starting from architectural design to construction, including the building materials supply chain. Hence, they are directly involved and impacted by the operationalization of the RTNB and the successful application of ECOBat energy label. ?? Architects are an important link in the process of obtaining licenses and permits for building construction, and they should therefore be well versed with the content of the operational guidelines that is proposed for municipal staff under Output 1.2.?

Risks to Achieving Project Objectives

Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?

Secretariat Comment at CEO Endorsement Request Cleared.

03/17/23, FB

A risk matrix is included mapping key risks to the project.

Agency Response

Coordination

Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?

Secretariat Comment at CEO Endorsement Request Cleared.

07/24/2023, FB

The request for change of the implementation/execution arrangements to UNDP-supported NIM has been approved.

06/22/2023, FB

1. The request for change of the implementation/execution arrangements to UNDP-supported NIM is being considered internally in parallel to this review. A decision will be communicated before completing the review process. in the meantime, please address the few outstanding comments.

03/17/23, FB

1. The project indicated that the proposed implementation modality is UNDP-supported NIM. and that this has been agreed with the GEF, and that the relative costs will be charged to the

project budget. We have no record of this arrangement being discussed nor agreed upon by the GEF. No formal request was received by the GEF SEC, duly accompanied by the correspondent formal and signed OFP requests. While we note the OFP letter is annexed to the ProDoc, the reasons for such arrangement being proposed are not made explicit. Tunisia is not a country with low capacity, and the need for UNDP to provide implementation support really sounds debatable. Please clarify the current status re: implementation arrangements.

Should the country wish to request and authorize the Agency to directly execute part of the GEF resources, GEFSEC needs to receive a formal request via email (please address it to Mr. Filippo Berardi, the PM), with attached OFP request, reasons for the request, breakdown of the budget for the activities to be directly executed.

- 80. UNDP project support: The Implementing Partner and GEF OFP have requested UNDP to services in the amount of USD 18,086 for the full duration of the project, and the GEF has ag provide such execution support services and for the cost of these services to be charged to the The execution support services whether financed from the project budget or other source out in detail and agreed between UNDP Country Office and the Implementing Partner in a Let (LOA). This LOA is attached to this Project Document (Annex 4).
- 81. To ensure the strict independence required by the GEF and in accordance with the UNDP

Agency Response
July 6, 2023 Response: .Noted with thanks.

The possibility of the support to NIM was raised and indicated at PIF stage, with further confirmation or information at CEO Endorsement Request. Following GEF comments, justifications for support to NIM modality are provided in a separate annex that accompanies the CEO ER. The justifications arise from an instable political context and a number of weaknesses that have been identified in the HACT micro-assessment and PCAT of the Ministry of Environment. Moderate risks have been identified for: Programme Management / Financial Reporting and Monitoring / Procurement; while significant risks have been identified for: Organisational structure and staffing, and importantly concerning the present project, a substantial risk on the Programme-Project Management component and high risk on GEF & GCF Procurement Assessment. The support to NIM management approach has been chosen after thorough analysis because no third party organization could be identified as Implementation Partner. The complex situation prevailing in Tunisia since 2011 shows that the Support to NIM management approach is best suited for projects implemented by the

Ministry of Environment. The recently approved and endorsed GEF-financed CBIT Tunisia project uses a Support to NIM approach.
Consistency with National Priorities
Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?
Secretariat Comment at CEO Endorsement Request Cleared.
03/17/23, FB
the project is in line with national priorities.
Agency Response
Knowledge Management
Is the proposed ?Knowledge Management Approach? for the project adequately elaborated with a timeline and a set of deliverables?
Secretariat Comment at CEO Endorsement Request Cleared.
06/22/2023
03/17/23, FB
The KM strategy correctly focuses on the importance of using lessons for scale up. A replication and investment plan are also foreseen as integral parts of the KM strategy.

1. Under output 3.2.3, it is stated that ?The project will also support the City of Kairouan to seek membership with the C40 Cities and/or ICLEI?. Such membership could definitely help

Kairouan to raise their ambition, but membership criteria are rather strict. How exactly will the project help the city achieve this?

Agency Response

Activity 3.2.3 has been updated to include the following text:

?The C40 Cities has very stringent requirements for membership. In order to pave the way for the City of Kairouan to become a member of C40 Cities, the capabilities of the City of Kairouan for mainstreaming climate change across municipal operations and services will be assessed against the requirements of C40?s Climate Action Plan (CAP) Framework. The result of this baseline assessment will be used to develop a plan that will enable the City of Kairouan to join the C40 Cities. The assessment will be carried out in collaboration with C40 Cities.?

Environmental and Social Safeguard (ESS)

Are environmental and social risks, impacts and management measures adequately documented at this stage and consistent with requirements set out in SD/PL/03?

Secretariat Comment at CEO Endorsement Request Cleared.

03/17/23, FB

A Social and Environmental Screening (SESP) and an Env&Social Management Framework (ESMF) have been completed for this project.

Agency Response

Monitoring and Evaluation

Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?

Secretariat Comment at CEO Endorsement Request Cleared.

03/17/23, FB

A budgeted monitoring Plan is included.

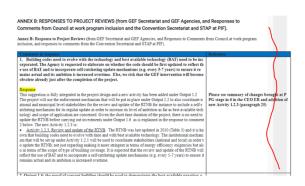
Agency Response
Benefits
Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?
Secretariat Comment at CEO Endorsement Request Cleared.
03/17/23, FB
Main expected socio-economic benefits are listed.
Agency Response
Annexes
Are all the required annexes attached and adequately responded to?
Secretariat Comment at CEO Endorsement Request Cleared.
07/24/2023, FB
All cleared.
06/22/2023
1. cleared.
2. while the budget is included as annex 3 to ProDoc (and uploaded in the portal), the

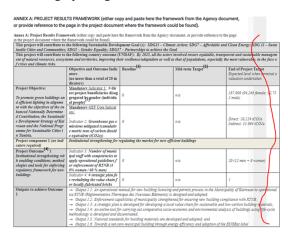
disaggregation changes made in the ProDoc are not reflected in the budget table in the CEO ER document (Annex E), which still includes a large budget line with several items included

(Contractual Services for 402k). Please amend.

04/08/23, PPO

1. Responses to Project?s Reviewers and Results Framework Tables are off the margins? they need to be amended, otherwise it would not be readable when circulating / posting.





2. Budget lines are bundled with several expenditures/activities in one line. As it is, it is not possible to assess the reasonability of the cost of these expenditures / activities vis-?-vis the three main sources of funding (project?s components? M&E? PMC). Please ask the Agency to itemize each expenditure (i.e. Project Manager, consultants, contractual services for outputs, etc.)? once resubmitted, we will be in a position to review the budget and provide comments if appropriate.

Agency Response

- 1. The page margins have been increased so that the tables fit within the printable area of the document.
- 2. An itemized expenditure is now provided.
- 3. The project budget table following GEF?s template guidance is correctly uploaded to the section of Annex E: Project Budget Table in the Portal.

July 6, 2023

Response:

Annex E of the CEO ER document is updated accordingly, to reflect the changes made on the budget of the Prodoc.

Project Results Framework

Secretariat Comment at CEO Endorsement Request Cleared.

06/22/2023

- 1. cleared.
- 2. cleared.

03/17/23, FB

- 1. Please add additional columns to the PRF to include information on who is responsible to carry out the monitoring and what is the mean/modality of verification.
- 2. indicator 3 could be strengthened or a new one introduced to assess the operationalization of the expanded scope of applicability of the RTNB, beyond just the creation of capacity to do that. What are the activities (to be) carried out to "ensure building compliance with RTNB", as per the formulation of Output 1.2? Can some of these activities be quantified and transformed in an indicator at end of the project (i.e. "increased % of buildings in the city that have been checked against the standard")?

Agency Response

- 1. The PRF in Annex A has been extended by adding two columns: Responsible Party and Means of Verification. The content of the two columns are taken from the Monitoring Plan that is contained in Annex 6 in the ProDoc. Hence, consistency is assured between the ProDoc and the CEO ER.
- 2. The comment is the same as made for Output 1.2 above. Indicator 3 in the Results Framework has been changed by adding a sub-indicator ?3(a) Number of updated RTNB and associated regulations?. The initial indicator has been retained as indicator 3(b) with the word ?updated? added in front of RTNB.

GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request Cleared.

03/17/23, FB

- 1. cleared.
- 2. only partially addressed, additional questions have been included in the review sheet at CEO ER stage. No need to respond again here.
- 3. cleared.
- 4. only partially addressed, additional questions have been included in the review sheet at CEO ER stage. No need to respond again here.
- 5. cleared. thank you.
- 6. cleared, with additional comments above in the review sheet.
- 7. cleared.
- 8 cleared.
- 9. cleared.
- 10. cleared.

The following comments were provided at PIF stage to be addressed during PPG stage:

- 1. Output 1.1: this output related to the implementation of the RTNB, which we understand is listed in the regulatory table as Joint regulation 23 June 2008, updated in 2010. If this understanding is correct, the project is proposing to train the municipality to use and enforce a building code that is more than 12 years old. Building codes need to evolve with the technology and best available technology (BAT) need to be incorporated. The Agency is requested to elaborate on whether the code should be first updated to reflect the use of BAT and to incorporate self-ratcheting update mechanisms (e.g. every 5-7 years) to ensure it remains actual and its ambition is increased overtime. Else, we risk that the GEF intervention will become obsolete already just after the completion of the project.
- 2. Output 1.6: the proof of concept building should be used to demonstrate the best available practices and technology for near-zero carbon buildings. While the building codes may set an average level of desirable improvements that also needs to be feasible, the demonstration building financed with GEF resources (to cover incremental cost) needs to be more ambitious and show a path towards a net-zero future, hence it should be a near zero building incorporating passive thermal comfort design features, highest available energy efficiency systems, as well as being ready to generate most of its energy needs through RE on site or off site. These technologies are available and the demonstration building should aim at showcasing these to the extent possible (see for instance GEF Project 10321 Zero Carbon

Buildings for All: from Energy Efficiency to Decarbonization, which is demonstrating netzero buildings in Turkey and Colombia).

- 3. The level of co-financing is well below the 1:7 average level for GEF7. GEFSEC expects that the Agency will work with the country during PPG phase to identify and deploy additional co-financing. In particular, (i) there is no in-kind co-financing from recipient institutions and project partners? and (ii) is there any co-financing expected from the private sector (and/or commercial financial institutions) for the infrastructure that will be purchased, complementing the GEF and existing public sector co-fin amounts?
- 4. calculation of direct emission reductions buildings components: we consider that these have been underestimated. It is not reasonable to assume that the application and/or more effective enforcement of new/existing MEPS and building code will only be extended from the pilot to an additional 6 buildings. This should calculated as a subset of the total new building stock to be build over the immediate lifetime of the current standards/MEPS, applying a GEF causality factor.
- 5. The Agency is requested to provide more information and analysis will be needed to justify why Classe 6 has been the baseline level (for GHG calculation) and why Classe 5 is considered appropriate as a minimum performance standard.
- 6. calculation of the direct emission reductions from the efficiency in public street lighting: this seems to be overestimated: it is not reasonable to assume that the baseline would be flat overtime, and that no improvement in street lighting would happen without the GEF intervention. There are clear reasons (economic savings) to undertake such upgrades, so although the GEF may accelerate the upgrade, some level of switching to the more efficient technology is reasonable to expect and should be therefore considered as baseline. Please revise the calculation to base them on a dynamic baseline, instead of a flat one.
- 7. The agency is expected to provide full documentation relative to the engagement during PPG stage of civil society and other relevant stakeholders, including the private sector, and to include the info in the CEO ER.
- 8. The Agency will need to submit a Gender Analysis (gap assessment) and Gender Action plan at the time of the CEO ER.
- 9. The section on climate risk will need to be expanded and further analysis carried out during PPG stage. This should follow the STAP guidance on climate risk, which is available here: https://www.stapgef.org/sites/default/files/documents/GEF%20AGENCY%20RETREA T%20Mar-Apr%202020.pdf
- 10. The private sector engagement section is very weak, it mentions the role of architects, but says nothing about construction companies, ESCOs or financial institutions. The role of these actors will need to be further analyzed during PPG stage with the view of having it fully flashed out at CEO ER submission.

Agency Response The above comments were addressed in the first submission and all but 2 of them were cleared by the GEF. For the two that were partially addressed, responses have been provided where appropriate, according to specific GEF comments.

Council comments

Secretariat Comment at CEO Endorsement Request N/A

STAP comments

Agency Response

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

Convention Secretariat comments

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

Other Agencies comments

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

CSOs comments

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

Status of PPG utilization

Secretariat Comment at CEO Endorsement Request Cleared. 03/17/23, FB please see comments to corresponding box above in this review sheet. Agency Response Project maps and coordinates Secretariat Comment at CEO Endorsement Request Cleared 03/17/23, FB •a map is included, with coordinates. Agency Response Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only) Secretariat Comment at CEO Endorsement Request N/A Agency Response Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

GEFSEC DECISION

RECOMMENDATION

Is CEO endorsement recommended? (applies only to projects and child projects)

Secretariat Comment at CEO Endorsement Request 8/1/23: PPO review: agency is requested to address PPO comments and resubmit.

07/24/2023 - Yes, the CEO Approval is recommended from a technical standpoint and pending PPO review.

not at this stage - agency is requested to address the comments in the review sheet and resubmit.

Review Dates

Secretariat Comment at	Response to
CEO Endorsement	Secretariat comments

First Review	3/28/2023	
Additional Review (as necessary)	6/22/2023	
Additional Review (as necessary)	8/1/2023	

Secr	etariat	Comment	at
CEO	Endor	sement	

Response to Secretariat comments

Additional Review (as necessary)	9/26/2023	
Additional Review (as necessary)	10/27/2023	

CEO Recommendation

Brief reasoning for CEO Recommendations

CEO MEMO:

The building sector is the largest final energy consumer in Tunisia with 37% of total energy use in 2019. When considering the carbon content embedded in building materials, about at least 55% of GHG emissions become attributable the building sector. The large potential for carbon emission reductions in this sector is recognized by national regulations, which prioritize interventions in public buildings and capacity development of government agencies. In light of these considerations, this project will support the decarbonization of the building sector through 3 main components, focusing on the most cost-effective interventions to improve efficiency in the use of energy and materials:

- 1. Institutional strengthening for regulating the market for new efficient buildings
- 2. Energy efficient public lighting
- 3. Knowledge management, monitoring and evaluation, and scale-up strategy

The project is expected to result in the generation of approximately 82,409 tons in direct and indirect GHG emission reductions.