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## Scaling up investment in energy efficiency in buildings through enhanced energy management information system (EMIS) and green social housing

### Basic Information

**GEF ID**

10402

**Countries**

Azerbaijan

**Project Title**

Scaling up investment in energy efficiency in buildings through enhanced energy management information system (EMIS) and green social housing

**GEF Agency(ies)**

UNDP

**Agency ID**

UNDP: 6479

**GEF Focal Area(s)**

Climate Change

**Program Manager**

Filippo Berardi

# PIF

## Part I – Project Informatic

### Focal area elements

#### 1. Is the project/program aligned with the relevant GEF focal area elements in Table A, as defined by the GEF 7 Programming Directions?

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

11/05/2019, FB:

Item cleared.

PLEASE RUN A SPELL-CHECK / PROOFREAD THE DOCUMENT BEFORE RESUBMITTING - there are several typos.

10/24/2019, FB:

With regards to the eligibility of the proposed activities vis a vis the selected Focal Areas, please note:

1. As a general comment, it is the GEFSEC's view that the proposed project should be divided in two separate projects, and FSP for CCM and an MSP for LD, which can both support the the Baku Green Strategy. The connection between the energy and the land components is weak, and would not support the rationale for structuring a Multi Focal Area Project. OK
1. CCM-1-3: the project's activities related to energy efficiency are eligible for CCM-1-3 STAR financing, taking into account the rest of the comments provided in the rest of this review sheet. However, as CCM FA does not support urban planning outside the Sustainable Cities IP, so component 1 would not be able to use CCM resources. OK
2. LD: the use of LD STAR resources would be allowed for the components related to land degradation within this project, as they would target productive landscapes (agriculture and forests). However, these are points for consideration: OK
  - - The clear LD Output 5.1.1 is only \$468,833 for TA and some resources from LD STAR are assumed to also go into Output 1.1.1, which is also TA (without a clear allocation of each FA's STAR resources to individual outputs is it difficult to make this determination). What are the field-based LD interventions that are being financed as part of the LD intervention?

- - The LD sub-objective that have been selected picked is ok, as it is integrated management (including some proposed restoration and some SLM activities). However, a SLM target has not been indicated. One should be included and double-counting should be avoided.
- - LD is also very much about also supporting livelihoods. However, a target group for this intervention has not been specified. Who and how many small farmers are being targeted, what is the potential for improvement of income, are there extension officers included in the project activities?
- - In terms of LDN: how is the project assisting with meeting the LDN targets at the country level?
- - In relation to the above, are there mechanisms at the institutional level for monitoring the progress towards meeting the LDN targets.
- - It is recommended that a better and more detailed map is provided, which clearly identifies the LD and city areas they are being targeted.

### 3. BD: OK

- 5.1.1 – There is no description of how this will benefit biodiversity and is, therefore, not eligible for biodiversity funding.
- 5.2.1 – The GEF supports restoration and rehabilitation of ecosystems for biodiversity in very limited cases where it is cost effective, efficient and will have direct impact on biodiversity of global significance. This work does not meet this threshold.
- 5.2.2 – While the area described is a Key Biodiversity Area and does house biodiversity of global significance, at this point the GEF is looking to take more strategic approaches to supporting the management of protected areas and their long term financial sustainability and good management rather than one-off support. FAO is in the PPG phase of a Protected Area project in the country and UNDP had an MPA project in GEF-6. More information will need to be provided to assess how this new project would build off of that work in how it approaches the management of the target PA.

With the above noted, we would recommend splitting the proposed project into two separate ones, one focusing on energy/CCM and the other on LD/BD. OK

Please note that the additional comments provided in this review sheet will focus on the energy/CCM portion of the submission.

### Agency Response

UNDP Response of 11/07/2019:

UNDP has addressed the few typos and space before or after punctuation, and has undertaken a spellcheck on both the revised PIF and the UNDP Response to GEF Secretariat comments.

4 Nov. 2019:

- 1.- UNDP agrees with the GEF Secretariat comment and agrees to split the PIF into two separate projects, one on climate change mitigation and a second project on land degradation. Following consultations with the Azerbaijan GEF Operational Focal point, it was decided to make maximum efforts to submit the climate change mitigation PIF to the December 2019 GEF Council meeting and the land degradation PIF to the June 2020 GEF Council meeting.
- 2.- CCM-1-3: the project's activities: UNDP agrees with this comment and has dropped component 1 from the revised PIF and changed the name of the project to "Scaling up investment in energy-efficiency in buildings through design and implementation of energy management information system (EMIS) and support for green social housing".
- 3.- LD: Land Degradation activities and outputs have been taken out of this PIF and the revised PIF focuses on energy-efficiency only.
- 4.- BD: Biodiversity activities have been removed from the revised PIF.
- 5.- All GEF comments are accepted. The multifocal PIF is split and the resubmission focuses on CCM only and the revised PIF has a new name and it is called "Scaling up investment in energy-efficiency in buildings through energy management information system (EMIS) and green social housing"

### Indicative project/program description summary

## 2. Are the components in Table B and as described in the PIF sound, appropriate, and sufficiently clear to achieve the project/program objectives and the core indicators?

### Secretariat Comment at PIF/Work Program Inclusion

11/07/2019, FB:

**This item is cleared.**

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11/5/2019, FB:

1. It is understood that the difference between output 2.2.1 and 2.2.3 is related to the fact that output 2.2.1 will be installing the EMIS in 1 million m2 of floor space, and that 150k of that floor space will then receive concrete EE investment projects to realize the savings as highlighted by the EMIS previously installed. As presented at the moment, the relation between outcomes 2.2.2, 2.2.3 and 2.2.4 is not immediately clear in Table B, and may look confusing. GEFSEC would suggest to include a reference in the output name of "phase 1",

"phase 2", "phase 3", to convey the idea that the intervention will be done on three sequential phases, (i) installing the EMIS, (ii) performing the audits and (iii) implementing specific energy saving interventions/projects on a smaller subset of the first two, presumably where the energy savings/emission reduction opportunities are most cost-effective.

— 1. a. Please revise the wording of the 3 outputs to make this clear.

—1.b. Please also clarify this sequential nature of the interventions under Outcome 2.2 in the description of the component the section on alternative scenario

—1.c. the description of output 2.2.3 could be better framed as "implementation of energy saving projects in [at least 30?] public buildings based on the measures identified by the EMIS and the results of the Energy Audits". There is no need to include in the description the value of financing mobilized as this is already listed as co-finance.

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10/24/2019, FB:

1. CCM-related components (component 2, 3 and 4) would tentatively look adequate to achieve the project's objectives. However, before a final determination can be made, important questions are raised below that needs to be addressed.

## Agency Response

4 Nov. 2019

Component 1 is now completely revised focused on policies and legislation to promote energy-efficiency. Meanwhile there are significant changes to components 2,3,4 to focus on CCM only and component 5 has been removed.

## Co-financing

**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, with a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized?**

Secretariat Comment at PIF/Work Program Inclusion

11/05/2019, FB:

Item cleared.

10/24/2019, FB:

1. CCM amounts and co-financing amounts should be disaggregated and allocated to each individual output to be able to assess whether resources are reasonably allocated across activities and sources of funding (GEF vs co-financing).

**Agency Response**

4 Nov. 2019

Co-financing amounts are disaggregated and allocated to each individual amount in order to be able to provide for a more reasonable allocation of resources and to clearly demonstrate that a 7-1 co-financing to GEF financing ratio has been met.

**GEF Resource Availability**

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

Secretariat Comment at PIF/Work Program Inclusion

11/05/2019, FB:

Item cleared.

10/25/2019, FB

The proposed GEF financing as presented in Table D is consistent with the country's STAR allocation available balance and the proposed use would be within the marginal allocation cap applicable of \$2 million.

### **Agency Response**

4 Nov. 2019

Given that the revised PIF is now focusing on climate change mitigation and energy efficiency only it means that only the CCM STAR allocation USD 5,060,000) is being requested. There is no request for marginal allocation is being made at the moment.

### **The STAR allocation?**

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

11/05/2019, FB:

Item cleared.

The project will only be financed with CCM STAR resources, which are available in the amount requested.

10/25/2019, FB

The project would be funded with CCM, LD, and DB STAR amount listed in Table D, and such amounts are available.

### **Agency Response**

4 Nov. 2019

The revised PIF is proposed to be funded from CCM STAR allocation only (STAR allocation USD 5,060,000)

## The focal area allocation?

### Secretariat Comment at PIF/Work Program Inclusion

11/05/2019, FB:

Item cleared.

The project will only be financed with CCM STAR resources, which are available in the amount requested.

10/25/2019, FB

The project would be funded with CCM, LD, and DB STAR amount listed in Table D, and such amounts are available.

### Agency Response

4 Nov. 2019

The revised PIF is proposed to be funded from CCM STAR allocation only (STAR allocation USD 5,060,000)

## The LDCF under the principle of equitable access

### Secretariat Comment at PIF/Work Program Inclusion

n/a

### Agency Response

## The SCCF (Adaptation or Technology Transfer)?

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

n/a

**Agency Response**

**Focal area set-aside?**

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

n/a

**Agency Response**

**Impact Program Incentive?**

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

n/a

**Agency Response**

**Project Preparation Grant**

**5. Is PPG requested in Table E within the allowable cap? Has an exception (e.g. for regional projects) been sufficiently substantiated? (not applicable to PFD)**

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

11/05/2019, FB:

Item cleared.

The requested PPG is USD 100,000 so it is within the allowed cap.

10/25/2019, FB

For FSP up to USD 10 million, the PPG cap is USD 200,000.

The requested PPG is USD 130,000 so it is within the allowed cap.

**Agency Response**

4 Nov. 2019

The multifocal area PIF was originally aiming to cover climate change mitigation, biodiversity, and land degradation focal areas which is more complex and requires to assemble a larger and more complex team of experts. PPG request is now reduced to \$100,000 as biodiversity/land degradation component is no longer in the revised PIF.

**Core indicators**

**6. Are the identified core indicators in Table F calculated using the methodology included in the correspondent Guidelines? (GEF/C.54/11/Rev.01)**

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

11/05/2019, FB:

Item cleared.

10/25/2019, FB

Core indicators are identified for BD and LD.

However, for CCM all expected emission reductions are listed under indicator 6.1 (AFOLU), when they should be split between 6.1 and 6.2 (emission avoided outside AFOLU).

In addition, an estimate of the total energy savings should be included in indicator 6.3.

### **Agency Response**

4 Nov. 2019

Indicators are revised, and values are included under 6.1 and 6.3.

## **Project/Program taxonomy**

### **7. Is the project/ program properly tagged with the appropriate keywords as requested in Table G?**

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

11/05/2019, FB:

Item cleared.

10/25/2019, FB

Yes, a project taxonomy is included. However, if the project is modified into a CCM stand alone, taxonomy should be revised accordingly.

### **Agency Response**

4 Nov. 2019

This comment has been addressed and the taxonomy has been fully revised.

## art II – Project Justification

### 1. Has the project/program described the global environmental / adaptation problems, including the root causes and barriers that need to be addressed?

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

11/05/2019, FB:

Item cleared.

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10/25/2019, FB - Please note that comments for PART II only refer to the CCM components.

BD and LD will have to be taken out if the project is redeveloped as stand alone CCM:

The problem related to bad energy efficiency performance and relative energy consumption of the building stock in Baku is well outlined. This is said to include: (i) limited/lack of availability of energy consumption data for buildings; (ii) unclear and incomplete legislation related to minimum EE standards, (iii) outdated construction/housing codes, (iv) Limited institutional capacity to assess EE performance in buildings.

#### Agency Response

4 Nov. 2019

Comments fully incorporated. The multifocal area PIF was split and the project was redeveloped as a standalone project that addresses only the CCM focal area.

### 2. Is the baseline scenario or any associated baseline projects appropriately described?

## Secretariat Comment at PIF/Work Program Inclusion

11/05/2019, FB:

**This item is cleared.**

The further details and justification provided respond well to the requests for further background from GEFSEC. The PIF now outlines the baseline scenario, including the existing projects and law/regulatory elements that should be considered already as part of the baseline. The need for further support to the government institutions in charge of further defining exiting or prospective energy savings law, through the adoption of technical standards, and the lack of alternative resources to do that, is also clearly outlined.

Also, the proposal now outlines the baseline with respect to the currently planned social housing interventions from MIDA, and the need for additional resources to further include consideration related to energy savings.

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10/25/2019, FB:

1. The baseline scenario is described. However, section 1.a.2 include a mix of baseline scenario information and statements about what would happen without the GEF intervention. These latter elements should be presented in the alternative scenario. OK
2. The baseline scenario should describe the GEF-5 GEF-funded project titled: NAMA for Low Carbon End use Sectors, which is still listed as under implementation with UNDP. This project includes outputs related to SOCAR's Green Building Program. At a minimum, the current proposal should discuss adequately the current status of the previous project as it related to similar objectives, the interactions with the new project proposed, the lessons learned and how they are being incorporated in the new project and provide a short a justification of the new funding requested for the same sector while the current project is still under implementation. It is unfortunate that the old project is not even mentioned in the new PIF (if not very briefly in the coordination section). OK
3. The baseline scenario must now include the new energy efficiency law which has/is being adopted with EU support. This section is in partial contradiction with the section explaining the problem, which states that there is "unclear and incomplete legislation related to minimum EE standards". OK
4. Considering the new law, it is not clear what the contribution of the GEF will be and whether it could be considered additional to the baseline scenario. In particular, it needs to be much better articulated what is the prescriptive content of the new law and what would therefore be already mandated for EE in buildings. To the extent to which this would need to be done anyway, independently from any GEF contribution, this project would not satisfy the principle of incremental cost. Please concisely outline the requirements of the new law. OK
5. With respect to the secondary legislation, including the technical building standards, please clarify: OK
  - a. what is the general content/coverage of this secondary legislation vs. the EE law?
  - b. what is already mandated and what will need to be developed?

c. for the aspects that will need development, what is the plan to finance them in the absence of the GEF project?

## Agency Response

4 Nov. 2019

**Comment 1:** The baseline scenario and the GEF alternative scenario are now fully separated.

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**Comment 2:** Further clarifications have now been included in the PIF to discuss objective, coordination, highlights of lessons learned and justification for new funding request. NAMA project will end mid - June 2020. While some lessons learnt and experience has been useful during the design of the current PIF (in that this project has in fact refurbished the first buildings in Azerbaijan, therefore reference to the energy saving potential has been made in the PIF) nevertheless NAMA project has been designed to assist SOCAR, a major corporation in Azerbaijan. The pilot EE measures in buildings under NAMA, consisted in refurbishment of SOCAR premises (5 buildings) and the project was not designed to scale up and replicate this experience nor to amend legislation. The Mid Term Review of the project has observed that and recommended that future GEF energy efficiency projects replicate NAMA experience while amending the legislation to overcome legal and policy barriers.

UNDP NAMA project is now more prominently referenced in the PIF (i) outlined in the Baseline Scenario Section 1.a.2 paragraph 30-33; (ii) Section 1.a.3 paragraph 40 (iii) under Section Private sector engagement.

**Comment 3:** The draft Law on the Use of Energy Resources is reflected in the Baseline Scenario Section 1.a.2 paragraphs 17-20. However, the new Law is not approved yet (envisaged to be approved mid-2020) therefore the old Law on the Use of Energy Resources adopted in 1996 is still in force. This law has only two references to buildings with no provisions on energy efficiency (explained under paragraph 13).

The sentence "unclear and incomplete legislation" now under paragraph 6, was used to describe the problem, which persists since the new Law is currently in a draft form, not approved and most certainly not enforced. An attempt to clarify the afore mentioned sentence can be read now under Section 1.a.1. paragraph 7: For example, the Housing Code (HC) of the Republic of Azerbaijan was adopted in 2009, however no major requirements regarding minimum energy efficiency standards have been introduced so far. Furthermore, the Urban and Construction Code of the Republic of Azerbaijan, 2012-is enforced by the State Committee on Architecture and City Building and by the Ministry of Emergency Situations. Art. 57 of this Code refers to constructions and states that these should comply with energy savings and energy efficiency requirements however it does not provide for further norms and standard."

**Comment 4:** The GEF Secretariat comment has been taken into account and more details are now provided. The new Law on Efficient Use of Energy Resources is developed with support from EU4Energy programme. The Law is expected to be adopted mid 2020. The norms and regulations to operationalize the Law are not developed and no other donor is supporting the Ministry of Energy, which does not have resources and capacity to fully develop all the necessary bylaws. The Ministry of Energy is soliciting and welcoming UNDP support in this regard (as unequivocally expressed during the PIF preparations consultations). Furthermore, the Ministry has solicited UNDP support in developing the Law on Energy Efficiency in Buildings.

The National Energy Efficiency Action Plan is currently under development with the support of EU4Energy Programme, aiming at being finalized by mid 2020 when the EU programme will end.

Therefore, the proposed GEF project is additional to the new Law and the new National Energy Efficiency Action Plan, in that it addresses secondary legislation which would not otherwise be developed in the baseline scenario.

The explanations added in the text in order to outline the requirements of the new Law and respond to the comments are reflected as follows: Section 1.a.2 paragraphs 17-20 text reads as follows:

In the baseline scenario, within the framework of the EU funded "EU4Energy Programme" a draft Law on Efficient Use of Energy Resources was developed, and it is in an advance stage of inter-ministerial consultation. The Law defines "the legal, organizational and economic basis of the state policy in the field of the efficient use of energy resources and energy efficiency and regulates the activities and relations of individuals and legal entities in this area".

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The new Law is expected to be approved mid-2020 and it will replace the current Law "On the Use of Energy Resources"(1996). The new Law adds key elements on energy efficiency and energy use, some of them relevant for buildings sector. However, no subsequent, secondary legislation (norms and regulations) is developed in order to implement the new Law. In the baseline scenario, no donor support to the Ministry of Energy is planned for the development of the secondary legislation which will operationalize the new Law.

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The draft new Law is not focused on the buildings sector exclusively; however, it covers provisions for some relevant aspects to energy efficiency in buildings. For example: (i) under Art. 7 it includes provisions for the development of the National Energy Efficiency Action Plan and for setting energy savings targets; (ii) under Art. 5 it provides general legal provisions for introducing minimum energy performance requirements for buildings and facilities, equipment, household electrical appliances (iii) Articles 8, 9 and 10 include general legal provisions concerning energy audits including in buildings (iv) Art. 14 include provisions concerning energy metering in new buildings and replacement of old ones in existing buildings (v) article 21 provides specific provisions for the development of other policy measures for : a) minimum energy performance requirements, b) energy performance certification of buildings; c) energy labelling etc.

Furthermore, the new Law mandates subsequent laws and normative acts to be developed and adopted after its entry into force. Importantly, the new Law is explicitly mandating the development of specific regulations and norms. For example, one of the new laws to be developed is the Law on Energy Efficiency in Buildings. Other normative acts to be developed, as mandated, are for example: the National Energy Efficiency Action Plan; guidelines on Energy Audit Accreditation; guidelines for conducting energy audits; energy management system standard; guidelines and requirements for energy managers and energy service providers etc ...

#### **Comment 5: a-b-c**

The proposed project work in order to develop the bylaws necessary to implement the new Law is reflected under Component 1 ( Section 1.a.3 paragraph 36). The proposed by laws to be developed by the project have a legal base (mandate), as provisions are made in the new Law.

Apart of the National Energy Efficiency Action Plan (NEEAP) nothing else is mandated (in the sense that no donor is supporting the Ministry of Energy to develop these bylaws and the Ministry does need support as they do not have enough resources). The baseline scenario is that there is no plan to finance the development of these bylaws. From PIF preparation phase discussions, the Ministry does not have enough resources to develop these bylaws and asked UNDP support.

Further description of the legal and policy work of the project has now been provided under Component 1 (Section 1.a.3 para 36- below) highlights below:

(i) Amendments to the draft National Energy Efficiency Action Plan (NEEAP) which is currently developed by EU4Energy, aiming at introducing explicit actions related to the Energy Management Information System (EMIS) and development of the necessary legal documents (eg. gov decrees; minister orders) regulating NEEAP implementation and monitoring and verification of implementation (which will not be developed by the EU4Energy project). As indicated in Section 1.a.1, some of the difficulties of NEEAP implementation in other countries' experience is that the monitoring and verification of achieved savings remain a challenge, and the absence of statistical data available to determine aggregated energy efficiency indicators for the targeted end-use sectors is difficult, and these lessons learnt will be taken into consideration when designing activities under this output. Azerbaijan is in the process of reforming its energy legislation and the proposed project will use this momentum to amend the NEEAP to also include more ambition and specific actions related to Net-Zero Carbon Buildings (for example: agreed national definition of Net-Zero Carbon Building; intermediate targets for improving the energy performance of new buildings transitioning to zero-energy buildings; policy interventions and financing to promote zero carbon buildings by 2050 etc). Tapping into technical expertise and establishing cooperation with similar GEF funded initiatives such as Building Efficiency Accelerator [1] and Zero Carbon Buildings for All[2] will be initiated during the PPG phase.

(ii) Secondly, the proposed project will enable the implementation of the new (draft) Law on Efficient Use of Energy Resources, which was developed already by the EU4Energy Programme. The new Law includes general provisions, but it needs to be operationalized after its adoption, through several normative acts and standards which are not developed, and which cannot be developed as the Ministry of Energy does not have sufficient institutional capacity. At the PPG stage, a brief legal review should be conducted to identify if there is a need for necessary amendments to the new Law, in order to make EMIS implementation mandatory (for example: introduction of specific articles on EMIS definition; article on obligations of designated organization with regard to energy data collection and input into EMIS; article on

enforcement of EMIS) . In addition, it is envisaged that the main normative (mentioned in the Law) will be developed by the project for example: the guidelines for conducting energy audits and content of energy audit report, guidelines for energy managers and for providing energy services (art. 8 of the Law). In addition, the project will explore in more detail during the PPG phase the necessary bylaws to be developed, mandated by the new Law under art. 21(e.g. for the implementation of the minimum energy performance requirements for buildings and regulations and standards for energy performance certification of buildings and development of regulations for energy metering (under art. 14); under art.11 (Energy Management System). Furthermore, the project will amend the existing legislation relevant to the building sector in order to include mandatory energy efficiency standards in building codes and minimum energy performance norms in buildings

(iii) Thirdly, as the new Law is mandating the development of the Law on Energy Efficiency in Buildings, the project will support the Ministry of Energy and will develop this particular law which will exclusively address the project's main focus which is the energy efficiency in buildings. Close consultations with the Ministry of Energy have taken place during the PIF preparation phase have revealed the need for technical assistance for the development of this specific Law of Energy Efficiency in Buildings. No other donor will support the Ministry of Energy in the development of this Law and according to the representatives of the Ministry, there is a lack of institutional capacity for the development of this Law. The development of the Law on Energy Efficiency in Buildings will be based on a comprehensive policy, legal and institutional analysis to be conducted by the project, as the legal provisions of this future law are not clear at the PIF writing stage (only the technical assistance need was identified) however it should build on the best practices available in EU member states or other EaP countries. (iv) Finally, the project will support the setup of working groups on the future legislative work and ultimately the creation of an Inter-ministerial Committee on Energy Efficiency, to further implement the legal and policy work including (not limited to) energy efficiency in buildings and implementation of EMIS at municipal level in the country.

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[1] <http://buildingefficiencyaccelerator.org/>

[2] <https://wriroscities.org/ZeroCarbonBuildings>

### 3. Does the proposed alternative scenario describe the expected outcomes and components of the project/program?

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

11/05/2019, FB:

This item is cleared.

The further details and justification provided on the proposed alternative scenario and its additionality vis a vis the baseline scenario is well received by GEFSEC. The relevant sections have been updated with the additional details provided in this review sheet.

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10/25/2019, FB:

1. Component 1 is not eligible with CCM. OK
2. Please briefly and concisely describe what an EMIS is and how it may help the alternative scenario (both at building and at national level). OK
3. Component 3: Considering the relative weight and importance of this component for the delivery of the project's objective, its description requires more details. For instance, what is the scope of the new EE law with respect to MIDA? Will MIDA be mandated to make amendments to their charter? Will they have discretionality in terms of level of ambition of the standards, and will the GEF support more ambition? OK
4. With regards to the secondary legislation/energy minimum standards and building codes, which would represent the alternative scenario enabled by the GEF Project, please clarify: OK
  - a. Coverage of the standards vs the EE Law
  - b. Who approved the standards, and how much discretionality they have within the scope of the law;
5. To further strengthen the proposal, and depending on the answers provided to some of the questions above, GEFSEC would like to propose to consider including in the project's objectives the adoption of building standards that go above and beyond what would be generally envisaged. This may include LEED certification for new (public) buildings within certain criteria. In particular, the concept of Net-Zero Carbon Buildings is rapidly emerging as a guide for future construction practices, and this project seems well position to assess the feasibility of adopting a roadmap for piloting and gradually introducing standards and regulations to allow complete decarbonization by 2050. The inclusion of analysis towards the consideration of new-zero or near-zero carbon buildings as well as of pilots/demonstration activities in this directions would strengthen the incremental cost reasoning of the Project. Please refer to the recently launched Net Zero Carbon Building for All initiative at the UN Climate Action Summit: OK

<https://www.wri.org/news/2019/09/release-wri-leads-zero-carbon-buildings-all-initiative-launched-un-climate-action>

[https://wriroscities.org/sites/default/files/19\\_WP\\_ZCB\\_final.pdf](https://wriroscities.org/sites/default/files/19_WP_ZCB_final.pdf)

## Agency Response

4 Nov. 2019

Further clarifications have now been provided as follows:

- **Comment 1:** Following amendments to PIF components were operated: Component 1 (LD/BD) was deleted as the multifocal area PIF was split into two PIFs and current PIF focuses on CCM only. Component 2 policy and legal work forms now Component 1. Component 2,3,4 remain the same (only adjusted as per below explanations). Component 5 was deleted and Component 6 (M&E) was merged with Component 4.
- **Comment 2:** EMIS has been described under Component 2, text reads under Section 1.a.3 paragraph 37: EMIS is a web application for monitoring and analysis of energy and water consumption data in public sector buildings and it provides a transparent overview and control of energy consumption in all public sector buildings- which is a very useful tool for Energy Management System in the public sector. EMIS collects energy data, necessary for key energy performance calculations, analysis and continuous overview and control of energy use, being therefore a key tool for monitoring the progress towards energy savings targets set by the NEEAP. This leads to an easier identification of potential measures of energy efficiency improvements, development of local energy efficiency improvement plans, implementation of projects that deliver energy and financial savings and at the end to monitoring and verification of achieved results. For each building of the public sector experts responsible for energy management gather and enter relevant data and information in EMIS. Once the data is in the system, EMIS application enables easy access by login from any computer with Internet access by typing own username and password.
- Additional EMIS contribution to proposed alternative scenario was inserted in different sections: e.g. under Section 1.a.7 Innovation where text reads as follows: The proposed project has a strong innovative dimension, given by the first time-ever major effort in Azerbaijan to introduce the on-line intelligent energy management information system (EMIS) at the municipal level. EMIS will likely to be sustainable because once the project successfully demonstrates that energy management information systems can lead to energy savings up to 10% or more at minimal cost, it is highly likely that these systems can be introduced to the whole country.
- EMIS contribution to data generation and informed policy making is reflected under the Gender Section and text reads: Under Component 2, the introduction of the Energy Management Information System (EMIS) will enable the collection of gender disaggregated data collection and analysis in connection with energy efficiency (and water) consumption in public and municipal buildings for the first time in Azerbaijan. This action is expected to provide the necessary data for policy makers with regard to the future opportunities to address the needs of women and men in relation to energy service and delivery. An effective EMIS is an important tool in catalyzing additional investments in energy efficiency as it can prioritize different investments regarding different energy consumption needs.

· **Comment 3:** MIDA is a State-owned construction company and any amendments to the legal framework will be implemented by MIDA. Currently MIDA implements the enforced building codes as regulated by Urban Planning and Construction Code and Housing Code. The new soon to be adopted Law on the Use of Energy Resources will not address buildings sector specifically and has no reference to MIDA. Amendments to MIDA Charter need not be mandated by this new Law. MIDA is regulated by the Strategic Roadmap for Development of Affordable Housing in the Republic of Azerbaijan and set up by the Decree of the President in 2016. MIDA's Charter details the agency's scope, activities, main objectives. It is understood (based on close consultations during the PIF preparation stage) that there is willingness and flexibility to amend MIDA Charter and promote higher energy saving ambition and that the foreseen amendments to the MIDA Charter need not be mandated by a regulatory or normative act.

**Comment 4:**

a) firstly, the new Law provides a legal basis for minimum energy performance in buildings (art 5) and then also mandates further amendments to other policies and laws (art 21). In addition, the new Law covers the following key elements: (i) under Art. 7 it includes provisions for the development of the National Energy Efficiency Action Plan and for setting energy savings targets; (ii) under Art. 5 it provides general legal provisions for introducing minimum energy performance requirements for buildings and facilities, equipment, household electrical appliances (iii) Articles 8, 9 and 10 include general legal provisions concerning energy audits including in buildings (iv) Art. 14 include provisions concerning energy metering in new buildings and replacement of old ones in existing buildings (v) article 21 provides specific provisions for the development of other policy measures for : a) minimum energy performance requirements, b) energy performance certification of buildings; c) energy labelling etc ...

Secondly, in order to amend building codes and introduce energy efficiency standards, as foreseen under Component 1, two actions will be taken by the proposed project (i) amendments to the relevant building legislation and (ii) development of a brand-new Energy Efficiency Law in Buildings.

b) energy efficiency standards are included in the Urban and Construction Code approved by a presidential decree, as described under paragraph 12 Section 1.a.1 and they need to be amended separately. Under art 21 the new Law includes provisions for the development of other policy measures for minimum energy performance requirements, energy performance certification of buildings, energy labelling).

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**Comment 5:** Further clarifications have been provided as Section 1.a.3 paragraph 36 : " Azerbaijan is in the process of reforming its energy legislation and the proposed project will use this momentum to amend the NEEAP to also include more ambition and specific actions related to Net-Zero Carbon Buildings (for example: agreed national definition of Net-Zero Carbon Building; intermediate targets for improving the energy performance of new buildings transitioning to zero-energy buildings; policy interventions and financing to promote zero carbon buildings by 2050 etc). Tapping into technical expertise and establishing cooperation with similar GEF funded initiatives such as Building Efficiency Accelerator<sup>[1]</sup> and Zero Carbon Buildings for All<sup>[2]</sup> will be initiated during the PPG phase" and paragraph 39 : "Close consultations with MIDA partners during the PIF preparation stage are indicating willingness to increase ambition and showcase best practices in energy performance in buildings and use of renewable energy sources but also flexibility to amend their charter and introduce standards for future Net-Zero or Near-Zero construction practices. MIDA is well positioned to demonstrate best practices and take up approaches for piloting Net-Zero or Near-Zero Carbon Buildings, given the fact that they are dynamic on the construction market. During the

PPG stage the approaches for the construction of one Net-Zero public building (a school or kindergarten) will be identified and agreed with MIDA. Together with MIDA, the project will organize a series of seminars with architects and engineers to demonstrate the benefits of integrating energy efficiency and energy consumption norms and standards into architectural design. Seminars on “green” architectural design will be part of awareness raising activities to promote Net-Zero or Near-Zero Buildings”

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#### 4. Is the project/program aligned with focal area and/or Impact Program strategies?

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

11/05/2019, FB:

This item is cleared.

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10/25/2019, FB:

As stated above:

1. CCM: energy efficiency related components are aligned to CCM-1-3
2. BD partial alignment, as stated above in the review sheet.
3. LD: partial alignment, as stated above in the review sheet.

##### Agency Response

4 Nov. 2019

The PIF is now fully aligned with CCM 1-3 “Accelerated Energy-Efficiency Adoption

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

## Secretariat Comment at PIF/Work Program Inclusion

11/07/2019, FB:

This item is cleared.

11/05/2019, FB:

1. Table 3 is useful. GEFSEC recommends to remove the dollar value from each of the boxes ("baseline" and "increment"), as the baseline includes all the measure already existing, likely not captured with the financing indicated. Amounts listed here are therefore confusing. Please remove indication of cost for "baseline" and "increment" from all components listed under table 3:

Baseline	GEF scenario and increment
<i>Component 1: Improved enabling environment for increased energy efficiency in buildings</i>	
<p>A draft National Energy Efficiency Action Plan (NEEAP) is currently being developed, expected to be finalized by mid-2020. It is unlikely that the plan will include EMIS related policy interventions. Bylaws for regulating the implementation and verification of implementation of NEEAP are not developed.</p> <p>In the baseline scenario, a new Law on Efficient Use of Energy Resources was developed and it is in an advanced stage of consultations., it is expected to be approved by mid-2020. No subsequent bylaws, norms regulations are developed and no donor support is planned.</p>	<p>The proposed contribution from the baseline to this project is three-fold:</p> <p>Firstly, amendments to NEEAP and introduction of explicit actions related to EMIS implementation will prioritize policy interventions related to targeted attractive EE refurbishments in public and municipal buildings based on EMIS data. The proposed alternative scenario will increase ambition in NEEAP and include specific actions related to Net-Zero Carbon Buildings. and include more ambition and specific actions related to Net-Zero Carbon Buildings.</p> <p>Secondly, the project will develop key secondary legislation (norms and regulations) necessary to operationalize the new Law and will amend related building legislation to introduce energy efficiency standards in buildings.</p> <p>Thirdly the project will work with the Ministry of Energy to develop the Law on Energy Efficiency in Buildings.</p> <p>In addition, the PPG stage will explore opportunity for support to a new ESCO Law and/or other related legal amendments.</p> <p>Baseline: \$ 800,000</p> <p>Increment: GEF \$250,000 and Co-financing: \$ 400,000</p>
<i>Component 2: Improved monitoring of energy consumption in buildings and leveraged financing for municipal EE investments through Energy Management Information Systems (EMIS) established at municipal level</i>	

2. Please note a small typo:

Baseline	GEF scenario and increment
<b>Component 1: Improved enabling environment for increased energy efficiency in buildings</b>	
<p>A draft National Energy Efficiency Action Plan (NEEAP) is currently being developed, expected to be finalized by mid-2020. It is unlikely that the plan will include EMIS related policy interventions. Bylaws for regulating the implementation and verification of implementation of NEEAP are not developed.</p> <p>In the baseline scenario, a new Law on Efficient Use of Energy Resources was developed and it is in an advanced stage of consultations, it is expected to be approved by mid-2020. No subsequent bylaws, norms regulations are developed and no donor support is planned.</p>	<p>The proposed contribution from the baseline to this project is three-fold:</p> <p>Firstly, amendments to NEEAP and introduction of explicit actions related to EMIS implementation will prioritize policy interventions related to targeted attractive EE refurbishments in public and municipal buildings based on EMIS data. The proposed alternative scenario will increase ambition in NEEAP and include specific actions related to Net-Zero Carbon Buildings, and include more ambition and specific actions related to Net-Zero Carbon Buildings.</p> <p>Secondly, the project will develop key secondary legislation (norms and regulations) necessary to operationalize the new Law and will amend related building legislation to introduce energy efficiency standards in buildings.</p> <p>Thirdly the project will work with the Ministry of Energy to develop the Law on Energy Efficiency in Buildings.</p> <p>In addition, the PPG stage will explore opportunity for support to a new ESCO Law and/or other related legal amendments.</p> <p>Baseline: \$ 800,000 Increment: GEF \$250,000 and Co-financing: \$ 400,000</p>
<b>Component 2: Improved monitoring of energy consumption in buildings and leveraged financing for municipal EE investments through Energy Management Information Systems (EMIS) established at municipal level</b>	

10/25/2019, FB:

1. question related to the incremental /additional cost of the GEF funding needs to be assessed in light of the answers provided to the baseline and alternative scenarios above. OK

2. Section 1.a.2, paragraph 1., mentions that without this project it is "likely to take significantly longer" for the country to implement the new legal framework. This information and assessment should be used to calculate the differential between what would have happened anyway (dynamic baseline) and what will happen as alternative scenario (GEF attribution of GEBs). This will be done with an attribution of only a fraction of the expected potential benefits from the adoption of the standards at city or local level, to the GEF project. Please refer to the guidelines included at the link below:

[https://www.thegef.org/sites/default/files/publications/GEF\\_EE\\_Methodology\\_v1.0\\_2.pdf](https://www.thegef.org/sites/default/files/publications/GEF_EE_Methodology_v1.0_2.pdf)

3. Estimated GHG emission reductions need to include both direct and indirect/consequential emissions. Indirect/consequential emissions are missing. Please calculate them following the provided guidance and include them both in this section and in the core indicators.

## Agency Response

UNDP Response of 11/07/2019

1. UNDP agrees with the comment and has made the suggested changes. Indications for cost increment have been deleted.
2. UNDP agrees with the comment and has implemented suggested changes. The typo and repetition of wordings have been addressed, and the text reads: "The proposed alternative scenario will increase ambition in NEEAP and include specific actions related to Net-Zero Carbon Buildings"
3. Indirect GHG emission reductions are now calculated, noting that further refinements are required at the PPG phase. It now states under Section 1.A.6 that "The Third National Communications of Azerbaijan has calculated the effect of the New Law on Energy Efficiency on CO2 reductions, concluding that it will lead to cumulative GHG emission reductions of 70.36 million metric tons CO2eq. This works out to approximately 2.81 million metric tonnes CO2eq per year for 25 years from when the project is scheduled to end from 2025 up until 2050. Conservatively, a GEF causality factor of 20% has been applied to this figure, taking to account that a new law on energy-efficiency has been developed for Azerbaijan by the EU4energy project meaning that many of these emission reductions would happen anyway and we are making the assumption that 80% of the energy savings and the emission reductions will come from the new law and 20% will come from secondary legislation and from work being carried out by this project. This works out to 2.81 million metric tonnes x 20% GEF causality factor = 562,000 tonnes of CO2e per annum of indirect GHG emission reductions as a result of the work of the project on secondary legislation. This number will be further refined during the PPG phase."

4 Nov. 2019

Further clarifications have now been provided in response to the GEF Secretariat comments. For example, Section 1.a.2 sentence "likely to take significant longer" was revised, and explicit wording was added to indicate the fact that currently there is no other donor supporting the secondary legislation to be put in place in order to operationalize the new Law on Efficient Use of Energy Resources (as reflected in Section 1.a.2 paragraph 18 which reads. " The new Law is expected to be approved mid-2020 and it will replace the current Law "On the Use of Energy Resources"(1996). The new Law will complement the legal framework with key elements on energy efficiency and energy use, some of them relevant for buildings sector. However, no subsequent, secondary legislation (norms and regulations) is developed in order to

implement the new Law. In the baseline scenario, no donor support to the Ministry of Energy is planned for the development of the secondary legislation which will operationalize the new Law.”). This means that during the lifetime of the project, it is highly unlikely that this new legislation will be developed.

The GEF Secretariat comments about the requirement for including both direct and indirect GHG emissions is noted and now in the revised PIF both direct and indirect (consequential) CO2 calculations estimate are included under Section 1.a.6

**6. Are the project's/program's indicative targeted contributions to global environmental benefits (measured through core indicators) reasonable and achievable? Or for adaptation benefits?**

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

11/07/2019, FB:

This item is cleared.

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**11/07/2019, FB:**

1. The calculation of indirect emission reductions needs to be revised as follow: OK

- a. estimate the share of the overall expected emission reductions (70.36 MtCo2e) from the new energy efficiency law which can be attributed to improvements to the building sector. For instance 20% or 30%, equivalent to 14 MtCO2e or 21.1 MtCO2e. OK
- b. Out of that share, 80% of the reductions will be attributable to the baseline represented by the EU4Energy project, while 20% are estimated to be attributable to the new secondary legislation funded by the GEF project. This estimate will be correspondent to the indirect emission reductions over the period considered by the Third National Communication (25 years). OK
- c. Please make the correspondent changes in the relevant section. OK

2. Paragraphs order: please change the order of the paragraphs so that the one describing direct emission reductions comes first, and then the one describing indirect emission reductions. OK

3. Paragraphs numbering: Please note that the numbering of the paragraphs is interrupted after para 43, and there are no paras for section 1.A.7., until numbering resumes at section 6 on Coordination. Please fix paragraphs numbering so that it is sequential, covering in all sections. OK

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11/05/2019, FB:

1. please provide a short write up of how the indirect emission reductions were estimated (500,000 t/co2e).

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10/25/2019, FB:

Direct emission reductions are reasonable. Indirect/consequential emission reductions are missing.

### Agency Response

2019/11/07 5pm NY:

Thanks for these comments.

Regarding indirect GHG emission reductions, we've adjusted the methodology, with an estimate that 20% of the total reductions from the EE law can be attributable to energy efficiency measures in buildings. Further we have then scaled the annual figure by 25 years. This generates a total indirect figure of 2.814 million tCO2eq. We will further refine these assumptions and methodology prior to CEO endorsement.

Regarding formatting

- We've switched the order of the two paragraphs
- We've renumbered the remaining paragraphs after paragraph 43.

UNDP Response of 11/07/2019

UNDP agrees with the comment and has provided the suggested write up, which has been reflected in the PIF document:

- (i) the amount of CO2 tones eq has been reflected in the Table F

(ii) a brief write-up explaining the indirect emissions reduction estimation has been provided under paragraph 42 and the text reads as follows: Lifetime indirect GHG reduction estimated at PIF stage is 562,000 tonnes CO<sub>2</sub> eq. The Third National Communications of Azerbaijan has calculated the effect of the New Law on Energy Efficiency on CO<sub>2</sub> reductions, concluding that it will lead to cumulative GHG emission reductions of 70.36 million metric tonnes CO<sub>2</sub>eq. This works out to approximately 2.81 million metric tonnes CO<sub>2</sub>eq per year. Conservatively, a GEF causality factor of 20% has been applied to this figure, taking to account that a new law on energy-efficiency has been developed for Azerbaijan by the EU4Energy project meaning that many of these emission reductions would happen anyway and we are making the assumption that 80% of the energy savings and the emission reductions will come from the new law and 20% will come from secondary legislation and from work being carried out by this project. This works out to 2.81 million metric tonnes x 20% GEF causality factor = 562,000 tonnes of CO<sub>2</sub>e per annum of indirect GHG emission reductions as a result of the work of the project on secondary legislation. This number will be further refined during the PPG phase

4 Nov. 2019

UNDP has now added calculations for indirect GHG Emission reductions to the revised PIF under Section 1.a.6. paragraph 43.

## 7. Is there potential for innovation, sustainability and scaling up in this project?

### Secretariat Comment at PIF/Work Program Inclusion

11/07/2019, FB:

This item is cleared.

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11/05/2019, FB:

1. There are several instances (Ctrl+F search highlighted 5) where net-zero carbon buildings are referred to as "zero-energy buildings". We suggest editing "zero-energy buildings" to either net-zero carbon buildings or net-zero energy buildings, as there is no such thing as a zero-energy building (unless un-electrified).

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10/25/2019, FB:

The potential for innovation is is considered justified. However, the potential for adoption of action plans and demonstration initiatives/pilots paving the way for Net-Zero or Near-Zero Carbon Buildings would significantly further enhance the innovation profile of this project and should be considered. The city of Baku should also consider a link with the UN-run and GEF funded Building Efficiency Accelerator: <http://buildingefficiencyaccelerator.org/>

## Agency Response

UNDP Response of 11/07/2019

Comments accepted and the suggested changes have been made in the revised text of the PIF. "Zero-energy" has been replaced with "Net-Zero Carbon Buildings".

4 Nov. 2019

The European Union took over ten years from moving firstly under the energy efficiency performance buildings directive and to then later moving in the direction of promoting net-zero or near-zero buildings. Hence, it is unrealistic for Azerbaijan to go straight from low efficiency buildings straight to net-zero or near-zero projects on a national scale. However, this does not stop innovative pilots being developed under this project. In particular, the demo projects with MIDA on green social housing will explore the opportunities to design, implement and demonstrate net-zero or near-zero energy-efficient buildings. This description is now included in Section 1.a.7 paragraph 45 on Innovation, Sustainability, and Potential for Scaling Up.

## Project/Program Map and Coordinates

Is there a preliminary geo-reference to the project's/program's intended location?

## Secretariat Comment at PIF/Work Program Inclusion

11/05/2019, FB:

This item is cleared.

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10/25/2019, FB:

Ok for the CCM component.

Better and more granular map would be required for the LD component.

### **Agency Response**

4 Nov. 2019

The LD component is now removed from the revised PIF.

## **Stakeholders**

**Does the PIF/PFD include indicative information on Stakeholders engagement to date? If not, is the justification provided appropriate? Does the PIF/PFD include information about the proposed means of future engagement?**

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

11/05/2019, FB:

This item is cleared.

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10/25/2019, FB:

The stakeholders consultation does not include any private sector organization. Please clarify if/how any consultation with building construction companies or associations, architects and other private sector providers of EE services will be included.

### **Agency Response**

4 Nov. 2019

The stakeholder consultation section of the PIF is now expanded (Table 4, under section 1b.2) to include description of how the project will coordinate with a much wider selection of stakeholders. The project will work with NGOs active in the environmental field on capacity building, training, and awareness fields. The project will work with construction companies for the pilot green social housing projects, working closely with MIDA and for the renovation investments in energy-efficiency in public buildings, based on the results of the EMIS implementation. Architects will also be involved in the design of the new buildings for the MIDA Social Housing program. The private sector will be involved as energy service providers for providing services related to the implementation of the selected measures.

## Gender Equality and Women's Empowerment

**Is the articulation of gender context and indicative information on the importance and need to promote gender equality and the empowerment of women, adequate?**

### Secretariat Comment at PIF/Work Program Inclusion

11/05/2019, FB:

This item is cleared.

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10/25/2019, FB:

Insufficient information on the gender approach related to the climate change and energy components are provided. Please further elaborate how the project will consider the gender dimension, including in the delivery of the technical training under component 4. OK

Examples of actions to be considered, in accordance with the finding of the gender gap assessment, can include (illustrative only):

- Gender balanced employment: Contracting women in civil works (if available) , financial and customer services, and as female engineers Liaise with the local labor bureau and construction companies to help inform women of the availability of jobs (direct and indirect) during construction.
- Active women participation in developing new energy efficiency building codes and standards, and in developing EE projects.

### Agency Response

4 Nov. 2019

The gender section of the PIF has now been fully revised under Section 3. Gender Equality and Women's Empowerment as follows:

Please note that a full and comprehensive gender assessment will be conducted during the project development phase (PPG phase), whose results will be reflected into a project Gender Action Plan. The Gender Action Plan will include distinct gender performance indicators and actions and timeline. Under Component 1, the project activities will be designed in such a manner as to include in as much as possible gender specific consideration in the policy and regulatory amendments. Under Component 2, the introduction of the Energy Management Information System (EMIS) will enable the collection of gender disaggregated data collection and analysis in connection with energy efficiency (and water) consumption in public and municipal buildings for the first time in Azerbaijan. This action is expected to provide the necessary data for policy makers with regard to the future opportunities to address the needs of women and men in relation to energy service and delivery. An effective EMIS is an important tool for catalyzing additional investments in energy efficiency as it can prioritize different investments regarding different energy consumption needs. Furthermore, under this component, the project will work with the Baku Executive Authority to prioritize investments in EE refurbishment of public and municipal buildings, primarily based on EMIS data; the project will EE refurbishment and support municipality to conduct energy audits of buildings, point at which the project will prioritize public buildings that are used by vulnerable groups such as retirement homes for elderly, schools for children, healthcare centers, social care centers etc. In addition, the project will work with the municipality to strengthen capacities to design attractive bankable projects with low payback period and this activity represents an opportune entry point to prioritize gender equality. Under Component 3, the project will work with MIDA aiming at "greening" the social housing in MIDA constructed public facilities, these representing activities where gender disaggregated indicators will be included to ensure that equal opportunities are in place for men and women beneficiaries of green social houses and beneficiaries of social facilities are properly reflected in MIDA Charter. Under Component 4, the project will deploy a suite of training, awareness and knowledge sharing activities, and will ensure that equal training opportunities are provided for both men and women, and that women are equally represented and supported to attend training (e.g. the project arranges for provision of professional child care services during training sessions). Awareness raising activities will involve participation and cooperation of women associations and women NGOs, to support mainstreaming of gender considerations in awareness raising and information materials, to ensure that awareness raising is developed on the different energy consumption patterns and needs of men and women and gender differentiated priorities in energy management initiatives.

## Private Sector Engagement

**Is the case made for private sector engagement consistent with the proposed approach?**

## Secretariat Comment at PIF/Work Program Inclusion

11/07/2019, FB:

This item is cleared.

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11/05/2019, FB:

The new PIF section and the clarifications provided below are well received.

However, please spell out the acronym "EaP" on the first sentence of this section.

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10/25/2019, FB:

Engagement with the private sector is very weak. All actors identified are state- or public sector owned.

How to engage with private construction companies, providers of energy efficiency services and especially private investors in the building stock, should be further considered and outlined at PIF level.

## Agency Response

UNDP Response of 11/07/2019

Comments accepted and suggested changes have been operated in the text. "EaP" is now spelled out. It reads now "EU Eastern Partnership (EaP)"

4 Nov. 2019

More information on the private sector has been included in the revised PIF under the Section Private Sector Engagement. Private sector construction companies and architectural firms will be involved as sub-contractors for specific activities. Stakeholders expected to participate in the project, and benefit from the capacity building and awareness raising events are: The State Oil Fund of Azerbaijan; The Catalyst Fund; EBRD; ADB; national banks: Demirbank, Muganbank, FINCA; Unibank; Green Growth Fund; Accessbank Alten Group etc

In addition, under component 1 the project now proposes under Section 1.a.1 paragraph 9 and under Section 1.a.3. paragraph 36 to (i) analyse any barriers hampering private sector involvement in green energy and EE investments and support legal amendments in order to introduce fiscal incentives and (ii) explore the possibility of developing a new law and secondary legislation to promote ESCO (Energy Service Companies) which invest in energy efficiency in public buildings.

At the same time, we keep in mind that this project is focused on the public sector and working with public authorities and with the MIDA affordable housing program. UNDP understands that developing an ESCO market for Azerbaijan, whereby the private sector invests in energy-efficiency under energy performance contracts (EPCs) is not realistic in the short-term during the lifetime of the project. Experience from other countries shows that a long-term regulatory framework for ESCOs needs to be put in place and following by significant capacity building and training before ESCO investments can even be considered. Azerbaijan is a long-way off from being ready for this. In fact, it is only by the end of this project that secondary legislation will be in place. However, by developing a new law to support ESCO market development this project will pave the groundwork for future private sector investment in energy-efficiency in buildings.

## Risks

**Does the project/program consider potential major risks, including the consequences of climate change, that might prevent the project objectives from being achieved or may be resulting from project/program implementation, and propose measures that address these risks to be further developed during the project design?**

### Secretariat Comment at PIF/Work Program Inclusion

11/07/2019, FB:

This item is cleared.

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11/05/2019, FB:

1. Environmental Risk is missing a risk rating.
2. Other aspects are adequately addressed.

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10/25/2019, FB:

The description of the risks is very limited. A number of additional risks should be considered, assessed and rated, including, but not limited to:

- Lack of Government willingness to adopt stringent EE standards/secondary legislation to enact the EE Law
- Lack of enforcement of the adopted standards
- Lack of willingness/capacity of private commercial banks to provide financing for retrofitting additional buildings
- Climate change (such as increases in winter temperature reducing the demand for space heating) can make investments in EE building retrofits less attractive
- Generation and disposal of special/harmful waste from building retrofits

### Agency Response

UNDP Response of 11/07/2019

UNDP has added an environmental risk rating now which is medium. It is made clear that a full ESMF (Environmental and Safeguards Management Framework) and Social and Environmental Screening Procedures (SESP) will be carried out during the PPG phase.

4 Nov. 2019

The risk section of the PIF has not been strengthened and the following text has been included:

#### **Lack of Government willingness to adopt stringent EE standards/secondary legislation to enact the EE Law:**

This risk is medium at the PIF stage (to be reassessed at PPG stage), as the new Law on Efficient Energy Use is not approved yet and the secondary legislation not developed. The Ministry of Energy, Ministry of Ecology and Natural Resources as well as MIDA Social Housing Agency and Baku City Authority, have already committed, in principle, to supporting greater investment in energy-efficiency at the municipal level. The risk will be mitigated by the project through on-going technical assistance to develop EE norms and regulations, further complement the legislative framework (develop the Law on Energy Efficiency in Buildings), through capacity development and trainings, communication and awareness raising to encourage political commitment and increased understanding of technical issues.

**Lack of enforcement of the adopted standards:**

The risk will sought to be mitigated by effective legislative and policy amendments to include penalties and strengthen enforcement regulation in building construction. The risk will be further mitigated by effective training and strengthening the capacity of the building force (builders working in construction), energy auditors and representatives of building inspectors of the Ministry of Emergency Situation while raising awareness on the importance of energy efficiency standards. Close cooperation with MIDA will promote the benefits of energy efficiency standards in building.

**The lack of willingness/capacity of private commercial banks to provide financing for retrofitting additional buildings:**

The risk was not assessed at PIF stage and MIDA is going to provide the financing for the green social housing project meaning that this risk is low. In addition, for the public buildings, the Ministry of Economy and Natural Resources and the Baku Executive Authority will provide funding from national and municipal budgets respectively. Hence, the lack of willingness of private and commercial financing is not a major risk for this project at all. The project is focused on the public sector and not on the private sector. An initial assessment of private banks to financing retrofitting for additional buildings can be considered but it is not considered to be a major risk. For municipal borrowing, from the consultations with Baku municipality, indications are that the State budget is providing the funding needed for the refurbishments of public buildings under agreement with the municipality. There is, in theory, no legal restriction for the municipal borrowing, yet borrowing is not very accessible for municipalities due to low fiscal capacity and that the government is not responsible for municipal borrowing. The PPG will also explore possibilities to introduce fiscal incentives to facilitate private sector investments in EE in buildings.

**Climate change (such as increases in winter temperature reducing the demand for space heating) can make investments in EE building retrofits less attractive:**

This risk in terms of diminishing the rationality of the project is very low due to the fact that the municipalities do not use energy just for heating and in any case the temperature increases in the near future according to the most recent IPCC estimates even under the business as usual scenario are not expected to be so high that they would completely remove the need for heating of the building stock in Azerbaijan during the winter time. In fact, the increased variability of temperatures may make the metering and automatic control of heating even more important from both the cost and energy saving point of view.

**Generation and disposal of special/harmful waste from building retrofits:**

The PPG phase will include a comprehensive Social and Environmental Safeguards Procedures (SESP) screening and the project will set up measures to deal with the generation of waste from building retrofits, by including specific terms regarding the environmental-safe waste disposal conditions and norms in the contractual agreement with building contractors, aligned with the national legislation.

## Coordination

**Is the institutional arrangement for project/program coordination including management, monitoring and evaluation outlined?  
Is there a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives in the project/program area?**

### Secretariat Comment at PIF/Work Program Inclusion

11/07/2019, FB:

This item is cleared.

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11/05/2019, FB:

1. while the coordination section was adjusted, there is still mention of activities to be executed directly by UNDP under para 41, which should be eliminated as per GEF Policy. Please delete para 41.

41. Under the project management component, support services will be provided during project implementation by UNDP to the Government upon the specific request of the national implementing partner. Types of activities to be supported by the UNDP during project implementation include organization of some international tenders, procurement of equipment, hiring of international consultants, hiring of national consultants, organization and arrangement of study tours. The cost of the support services to be provided by UNDP is currently estimated as \$ 67,815; which includes approx. \$27,126 technical and \$40,688 administrative services. This will be further reviewed during the PPG phase.

10/25/2019, FB:

1. In line with the GEF policy of separation between implementation and execution functions, UNDP is not to perform execution of project components. Please remove the text highlighted in yellow in the snapshot below.

## 6. Coordination

Outline the institutional structure of the project including monitoring and evaluation coordination at the project level. Describe possible coordination with other relevant GEF-financed projects and other initiatives.

1. The project will be Nationally Implemented (NIM), led and implemented by the Ministry of Ecology and Natural Resources (MENR) together with UNDP. A project management team will be established following the practice of UNDP with similar GEF-funded projects in Azerbaijan. Working in close cooperation with MENR, UNDP Country Office (CO), at the request of the implementing partner (MENR), will provide selected support services to the project - including procurement, contracting of service providers, human resources management and financial services - in accordance with the relevant UNDP Rules and Procedures and Results-Based Management (RBM) guidelines. The project management team is likely to consist of a Team Leader in charge of the overall project oversight and two international CTAs supervising the project activities related to climate change and land degradation/biodiversity respectively. The project team will be supported by technical experts as needed. UNDP office will support MENR in ensuring coordination and synergies with other similar projects and initiatives. Under Component 1, the proposed project will work in synergy with the State Committee on Urban Development and Architecture and will ensure the integration of the work done under this outcome with the State Committee's Baku's new master plan. Under Component 2, UNDP and MENR will ensure synergies with Baku Executive Office refurbishment programmes to prioritize investments in EE measures. The proposed project will also coordinate with the Eu4Energy project that supports Ministry of Energy in the development of the new energy legal framework and with the GEF funded NAMA project for energy efficiency in buildings related outputs. Under Component 3, MENR and UNDP will ensure synergies with MIDA Social Housing projects, whereas under Outcome 4, MENR will contribute to the awareness raising campaign on the benefits of EMIS and sustainable energy consumption, green urban planning that includes LDN targets and sustainable pasture and wetland management. Under Outcome 5 MENR together with UNDP will build on previous Clima East pilot project and will work with key stakeholders and relevant projects (e.g. GIZ-Sentinel) in implementing demonstrative pasture land restoration and protected areas management (e.g. with GEF funded FAO protected area project) integrated into Baku's Greater Area urban planning.

### Agency Response

UNDP Response of 11/7/2019: Done. Paragraph 41 has been deleted.

4 Nov. 2019

Done. This section is removed.

### Consistency with National Priorities

**Has the project/program cited alignment with any of the recipient country's national strategies and plans or reports and assessments under relevant conventions?**

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

11/05/2019, FB:

This item is cleared.

10/25/2019, FB:

Yes, the project's alignment with national priorities is adequately discussed.

**Agency Response**

4 Nov. 2019

This has now been done.

**Knowledge Management**

**Is the proposed "knowledge management (KM) approach" in line with GEF requirements to foster learning and sharing from relevant projects/programs, initiatives and evaluations; and contribute to the project's/program's overall impact and sustainability?**

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

11/05/2019, FB:

This item is cleared.

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10/25/2019, FB:

There are seven elements that are recommended in a knowledge management approach as best practices:

- 1) Overview of existing lessons and best practice that inform project concept;
- 2) Plans to learn from relevant projects, programs, initiatives & evaluations;
- 3) Proposed processes to capture, assess and document info, lessons, best practice & expertise generated during implementation;
- 4) Proposed tools and methods for knowledge exchange, learning & collaboration;
- 5) Proposed knowledge outputs to be produced and shared with stakeholders;
- 6) Discussion on how knowledge and learning will contribute to overall project/program impact and sustainability and
- 7) Plans for strategic communications.

We urge the agency to consider these elements more thoroughly at PIF level, and to include an overview on how existing lessons and best practices, including from neighboring countries with similar circumstances/markets, have informed the PIF development. The KM approach will then need to be further elaborated in the development of the project before CEO ER.

## Agency Response

4 Nov. 2019

UNDP has provided further clarifications for the GEF Secretariat on the knowledge management approach outlined in the GEF Secretariat comments.

The PIF preparation phase has entailed research and uptake of generated knowledge from similar GEF projects and best practices in countries of the region. At the PPG phase a knowledge management plan for the project will be developed by further up take of relevant lessons learned and best practices generated under different GEF funded Energy Efficiency in Building projects especially related to EMIS (e.g. Serbia, Croatia, Bosnia and Herzegovina) and will tap into exiting global knowledge base generated by innovative and avangarde programmes and initiatives (such as UN Led Building Efficiency Accelerator and Net-Zero Carbon Alliance) that may provide technical expertise and knowledge on the latest developments in the energy efficiency in buildings and zero-energy buildings ( e.g. as invited speakers and contributors to the events organized by the project). A key knowledge management feature that the project will build on, is the "Open Data" approach, an online open data knowledge management platform providing a basis for project's public outreach, community engagement and partnership building activities. The project related documentation, presentations, training materials, evaluative knowledge

as well as proposals and solutions generated within the project will be available on dedicated website (with full consideration of intellectual property rights). The “Open Data” is envisaged to be accessed with or without registration, depending on the complexity of requested data and benefits of social networking with people interested in this data. A suite of different processes designed to capture and disseminate lessons, best practices and expertise are proposed under Component 4, including: M&E (evaluative knowledge used in the project cycle management), trainings and knowledge generation, information sharing and facilitating access, awareness raising and at least 30 municipal government champions to lead by example and promote energy efficiency in building and a gradual transition to an ambitious decarbonization of building stock. The project will further make use of a diversity of tools and outputs such as the online energy information system (EMIS); an online open data platform; professional networks; South-South experience sharing; a voluntary Energy Efficiency Charter. At the same time, lessons learnt, and evaluative knowledge will be analyzed and collected and recommendations for upscaling results will be presented towards the end of the project.

Further details and comments are also provided.

#### 1) Overview of existing lessons and best practice that inform project concept;

The PIF preparation stage did entail research on similar projects in the region, focused on energy efficiency in buildings. The proposed project is building on best practices in introducing EMIS generated by GEF projects on energy efficiency in buildings in the region (mainly Serbia and Croatia,) and on lessons learnt from UNDP GEF NAMA project in Azerbaijan. References to lessons learnt and best practices are made under Section 1.a.1. paragraphs 8-9 with regard to lessons learnt from NAMA project in Azerbaijan. The text reads as follows:

- UNDP project on Nationally Appropriate Mitigation Actions (NAMA) for low carbon end-use sectors in Azerbaijan has implemented (among other activities) the first energy efficiency demonstration projects showcasing the energy savings potential in buildings. The energy efficiency building refurbishments were designed as pilot activities, and in-line with GEF mission, these pilot projects have served to gain hands-on experience with energy audits pre- and post-investments in four public buildings. The MTR has acknowledged that “Energy efficiency, including building insulation, implemented in reconstructed SOCAR buildings in pilot projects represent a unique and probably the first demonstration of building envelope insulation of reconstructed buildings in Azerbaijan on such a large scale. The expertise generated by this pilot projects create a unique opportunity for SOCAR for replication on a large scale across the whole country”.
- This Project was however designed to assist SOCAR, a major corporation in Azerbaijan and the project design did not foresee activities through which the identified policy/regulatory barriers (specifically in energy efficiency and renewable energy) should be overcome. Therefore, the Mid Term Review (MTR) report has recommended that subsequent Energy Efficiency projects should focus on the legal and policy barriers, including the lack of incentives for private sector involvement (due to inadequate legislation to incentivize private sector investments in green alternative energy and due to fuel subsidies) and the lack of institutional capacity for assessing energy saving potential in buildings, recommending therefore that future GEF projects be addressing these issues, in order to maximize GEF interventions.

Further reference to NAMA experience can be read under Section 1.a.2 paragraph 33, where the text reads as follows:

- Demonstrating savings in energy mean direct savings in the municipality budget and a focus on energy-efficiency in public buildings represents a good entry point for the transformation of the entire building sector. NAMA project has worked for the first time with private sector construction companies and promoted energy efficiency measures in buildings and generated a number of lessons learned that the proposed project will take up (explained under Section 1.a.1).

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Further references to lessons learned from EMIS implementation in Serbia, are made under Section 1.a.1 paragraph 15, where the text reads as follow:

· The first National Energy Efficiency Action Plan (NEEAP) is being currently developed (further described under the Baseline Scenario). Other countries' experience (e.g. Serbia) in the implementation of National Energy Efficiency Action Plan, is pointing at difficulties in the implementation of the foreseen actions and programmes, chiefly among them being that the monitoring and verification of achieved savings remain a challenge, and the absence of statistical data available to determine aggregated energy efficiency indicators for the targeted end-use sectors. These, and other challenges (such as absence of energy management information system which could provide data on energy consumption in buildings and savings potential) are likely difficulties that would be faced by Azerbaijan in the future implementation of their NEEAP.

Another example of further uptake of these lessons learned at PIF stage is being reflected under Section 1.a.3 paragraph 36, by the following text:

o Amendments to the draft National Energy Efficiency Action Plan (NEEAP) which is currently developed by EU4Energy, aiming at introducing explicit actions related to the Energy Management Information System (EMIS) and development of the necessary legal documents (eg. gov decrees; minister orders) regulating NEEAP implementation and monitoring and verification of implementation (which will not be developed by the EU4Energy project). As indicated in Section 1.a.1, some of the difficulties of NEEAP implementation in other countries' experience is that the monitoring and verification of achieved savings remain a challenge, and the absence of statistical data available to determine aggregated energy efficiency indicators for the targeted end-use sectors is difficult, and these lessons learnt will be taken into consideration when designing activities under this output

Similar consideration of previous experience under similar projects is reflected under Section 1.a.3 paragraph 40 where the text reads:

o Under this component the proposed project will train 400 municipal officials, architects, engineers, energy auditors in minimum EE standards and energy consumption in buildings. The trainings will support capacities to use EMIS. Recommendations of the Mid Term Review of GEF funded project in Serbia "Removing Barriers to Promote and Support Energy Management Systems in Municipalities throughout Serbia" has highlighted for example the importance of ensuring adequate capacities of EMIS unit and energy managers to transition gradually from monitoring energy savings data to energy management ("start using data to manage energy consumption") through trainings and specific guideline documents and ongoing assistance. Furthermore, the project will build on UNDP NAMA lessons learned and recommendations to develop energy audit capacities through dedicated training sessions and guidelines.

Recommendations for PPG stage are taken up from Lessons learned Report of the GEF Project on Energy Efficiency in Croatia, for example a relevant text is reflected in the PIF, under Section 1.a.1 para 16:

o The necessity to build up a critical mass of awareness and capacity prior to deploying tools, methodologies and financial instruments are highlighted in the Lesson Learnt report of the GEF Energy Efficiency Buildings in Croatia and referenced and taken up by the similar GEF funded EMIS project in Serbia. Some recommendations for the project preparation phase and designing activities are listed as follows: “ It is important not just to recognize and describe the symptoms, but to understand the underlying causes of the detected problems. Key interventions should be directed towards institutional and professional capacity and competence building. There is no point in providing free energy audits prior to developing capacities to implement EE measures. There is also no point in providing financial instruments prior to developing demand for EE loans through a public promotion and awareness campaign etc”; “ provisions for knowledge management, scaling up, and exit strategy and sustainability must be included and elaborated in the project preparatory stage”; “ to achieve true capacity development outcomes takes time, for strategic change project it makes no sense to programme for a period less than five years”.

2) Plans to learn from relevant projects, programs, initiatives & evaluations:

Some of the recommendations of EMIS Serbia project MTR have been already embedded in the current project structure. Furthermore, during the PPG stage, a more thorough analysis of available learning opportunities will be researched and consultation with Serbia project team and with EU4Energy Project in Azerbaijan are envisaged; as well as initiating collaboration with new initiatives (as suggested) with UN Buildings Efficiency Accelerator and Zero Carbon Buildings, as referenced below, text reads as follows under Section 1.a.3 paragraphs 37:

o The proposed project will work with Baku City Executive Authority to show case the benefits of energy saving potential gained through EMIS piloting in Baku and based on these results it is expected to replicate EMIS working with municipal authorities in other major cities in Azerbaijan in the project. Furthermore, the proposed project support Baku City Executive Authority and other participating municipalities’ (for example: Ganja, Sumgayit, Mingechevir, Sheki, Guba, Ismayilli, Gabala and others) collaboration with global programmes and tapping into global energy efficiency in buildings at municipal level repository of knowledge such as the UN led Building Efficiency Accelerator.

3) Proposed processes to capture, assess and document info, lessons, best practice & expertise generated during implementation;

4) Proposed tools and methods for knowledge exchange, learning & collaboration;

5) Proposed knowledge outputs to be produced and shared with stakeholders;

6) Discussion on how knowledge and learning will contribute to overall project/program impact and sustainability and

7) Plans for strategic communications.

A Communication and Knowledge Management Plan will be developed during the PPG phase. Activities aimed at enhancing capacity and promoting sustainability will include trainings and knowledge generation, information sharing and facilitating access, awareness raising and M&E and making use of a diversity of tools and outputs such as the online energy information system; an online open data platform; professional networks; South-South experience sharing; voluntary municipal energy efficiency charter. At the same time, lessons learnt, and evaluative knowledge will be analyzed and collected and recommendations for upscaling results will be presented towards the end of the project. Incorporation of the proposed KM elements are reflected under Section 1.a.3 paragraph 40 which now reads as follows:

Component 4 of the project focuses on training, public awareness, capacity building and will deliver valuable project and lessons learnt with compiled knowledge materials and recommendations for the removal of the identified barriers, including institutional and regulatory improvements and related public outreach and technical assistance to scale up, replicate and mainstream the project results. Project communication and knowledge management plans will be developed. The proposed project is building on best practices in introducing EMIS generated by GEF projects on energy efficiency in buildings in the region (Serbia, Croatia, Bosnia and Herzegovina) and on lessons learnt from UNDP GEF NAMA project in Azerbaijan. Under this component the proposed project will train 400 municipal officials, architects, engineers, energy auditors, energy managers and construction builders in several areas, chiefly in EMIS, energy audit and minimum EE standards and energy performance in buildings.

Recommendations of the Mid Term Review of GEF funded project in Serbia “Removing Barriers to Promote and Support Energy Management Systems in Municipalities throughout Serbia” has highlighted for example the importance of ensuring adequate capacities of EMIS unit and energy managers to transition gradually from monitoring energy savings data to energy management (“start using data to manage energy consumption”) through trainings and specific guideline documents and ongoing assistance. Furthermore, the project will build on UNDP NAMA lessons learned and recommendations to develop energy audit capacities through dedicated training sessions and guidelines. Together with MIDA, a partner which could become the proposed project’s Champion, Green Housing Architectural contests will be organized to promote the energy efficiency in buildings (starting from the early design stage) and the concept of Net Zero Building for the first time in Azerbaijan. The project’s results and best practices will be collected, analyzed and codified into valuable knowledge products made available and disseminated through a comprehensive on-line and regularly updated open data and a networking platform and clearing house, workshops and seminars. The project will support development of knowledge networks promoting collaboration and mutual support among professional peers (e.g. energy auditors; energy managers) and moderated on-line forums providing a basis for project’s public outreach, community engagement and institutional cooperation mechanism at municipal and national levels.

At least two international public outreach, knowledge management workshops and seminars will showcase the experience of EMIS and will promote Net-Zero Carbon in Buildings and show case the Net Zero Carbon social housing MIDA pilot. The workshops will be carried out after the MIDA Green Social Housing pilot project has been completed. A project dedicated website on EMIS, managed by the EMIS Support Unit, will increase the understanding of the EMIS role and awareness and perception on the importance of sustainable energy consumption and energy efficiency in buildings and familiarity with Net Zero Carbon Buildings. The project will work closely with Baku Executive Authority, and with at least 30 other municipalities in Azerbaijan, in order to raise awareness and understanding on energy efficiency in public and municipal buildings. Part of the outreach efforts will be expected to lead to an Energy Charter signed by all 30 municipalities which will identify voluntary targets for energy efficiency and will outline specific activities and measures to achieve these targets.

### art III – Country Endorsements

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

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

11/05/2019, FB:

This item is cleared.

A revised LoE has been submitted.

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10/25/2019, FB:

Yes, the project is endorsed by the current operational focal point.

#### Agency Response

4 Nov. 2019

A new Letter of Endorsement for the CCM STAR allocation only has been prepared and signature requested from the GEF Operational Focal point. The letter of endorsement will be provided to the GEF Secretariat as soon as it is ready.

### Termsheet, reflow table and agency capacity in NGI Projects

**Does the project provide sufficient detail in Annex A (indicative termsheet) 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 in Annex B to assess the project capacity of generating reflows? If not, please**

**provide comments. After reading the questionnaire in Annex C, is the Partner Agency eligible to administer concessional finance? If not, please provide comments.**

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

n/a

**Agency Response**

**EFSEC DECISION**

**RECOMMENDATION**

**Is the PIF/PFD recommended for technical clearance? Is the PPG (if requested) being recommended for clearance?**

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

11/07/2019, FB:

This PIF is recommended for technical clearance.

11/07/2019, FB:

Not yet at this stage. Please consider the comments provided, revise the PIF and resubmit.

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11/05/2019, FB:

Not yet at this stage. Please consider the comments provided, revise the PIF and resubmit.

10/25/2019, FB:

Not at this stage. Please consider the comments provided, revise the PIF and resubmit.

## ADDITIONAL COMMENTS

Additional recommendations to be considered by Agency at the time of CEO endorsement/approval.

Secretariat Comment at PIF/Work Program Inclusion

## Review Dates

	PIF Review	Agency Response
First Review	10/25/2019	
Additional Review (as necessary)	11/5/2019	
Additional Review (as necessary)	11/7/2019	
Additional Review (as necessary)		
Additional Review (as necessary)		

## **PIF Recommendation to CEO**

### **Brief reasoning for recommendations to CEO for PIF Approval**