FP047 - GCF-EBRD Kazakhstan Renewable Energy Framework (Kazakhstan/EBRD)

CSO comments on the project given as intervention during the 18th GCF Board Meeting, October 2017

* The programme looks beneficial on the whole, but we are concerned about the role of hydropower in the proposal. If the objective is to make Kazahkstan's electricity supply more diverse and resilient, the focus should not be on additional hydropower installations. Changing precipitation patterns and droughts make hydro power supply less stable, and it often brings with it other environmental and social risks. We therefore suggest to exclude or significantly reduce the proportion of hydropower that is allowed.

* The definition of small scale hydro should be changed too – recently, for example, IRENA offered a definition of small scale hydro as up to 20MW (rather than 35MW). Further criteria should be provided for each sub-project on the height of the dams and size of the reservoirs, and on the socio-environmental footprint of the project.

* The gender action plan is extremely vague. The significant strengthening and improvement of this gender plan should be a condition for disbursement – with timed targets, clear assignment of responsibilities, specific baselines and targets, and a designated budget.

* We also seek more clarity on a provision in the ESMSF for the project which seems to differentiate between private and public sector disclosure requirements for category A subprojects. 120 days prior disclosure should be the standard for all category A sub-projects (not 60 days for the private sector, as suggested in the current ESMSF).Such consultations should also be documented on the GCF website as well as that of the EBRD.

* We welcome the fact that financing will be provided to make necessary upgrades to the grid specifically for renewable energy integration. However, we would like to see further clarity on how this is to be assessed.

* Finally, this proposal raises a series of policy questions that we will submit in writing. Notably, although it is half public, half private, the classification as “private” severely restricts transparency. There is also an issue of concentration: if it is approved alongside all others before B.18, almost 30% of GCF funding will be channelled through the EBRD alone.