

## **FP309: Resilient Water Systems for All (RWS4All): Deep Adaptation Pathways for Water Infrastructure in Kyrgyz Republic and Tajikistan**

**Access the document:** <https://www.greenclimate.fund/board-document/gcf-b45-02-add10>

We appreciate the efforts of this two-country adaptation programme to address the resilience of water systems comprehensively beyond the typical infrastructure focus, incorporating legislative and regulatory reform alongside capacity building in smaller municipal utilities to manage climate risk and ensure reliable water service delivery.

Although the EBRD sees especially the focus on utility-level engagement as strengthening local level adaptation, a fourth segment, namely the users and their empowerment are not strongly enough addressed, But local communities' engagement, feedback and agency are important, as a substantial part of the sought system-wide approach in both countries is the focus on cost-recovery through adjusting consumers' water tariffs upwards.

The use of GCF support in the form of grants, to be blended with EBRD commercial loans according to the demonstrated climate-resilience component of each infrastructure investment sub-project, is claimed to be justifiable to ensure that planned tariff increases keep "household affordability broadly within acceptable limits" through a proposed short-term social support plan for targeted vulnerable populations. But it is not clear if the programme has secured the dedicated funding for the social support reform plan before water tariffs are starting to be raised, and none of the GCF grant resources put into this programme will be used for this purpose.

We are strongly supportive of grant support for adaptation measures that focus on direct benefits through local public goods provision to end beneficiaries as a matter of climate justice. However, we suspect that the GCF's grant component is used here more to close the financial viability gap for MDB sovereign debt financing, than to safeguard the best affordability outcomes for the most marginalized consumers.

The EBRD has been engaging in both countries for well over a decade in efforts around water sector and water tariff reform, institutional strengthening and utility capacity building as well as water infrastructure investments, which the EBRD, as a matter of due diligence, should be focusing on climate resiliency with its own resources. We are also concerned with the potential that the quality of sub-project investments to align with climate resiliency



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improvements cannot be maintained across the programme portfolio and thus climate outcomes could be diluted.

The gender action plan to ensure gender-responsive water service delivery in light of increasing climate risks seems comprehensive, but is underresourced with just 330,000 EUR budgeted. There are also concerns about it being developed as a desk-based review. There is no available primary data collected and thus, no stakeholder engagements with gender groups during the proposal stage. This could mean that initial measures and targets were based on assumptions and will only be validated when the implementation begins and utility-level gender assessments and GAPs are developed towards the end of the programme in late 2030.