

CSO Comments on the Report of the Independent Appeals Panel (BM22, February 2019)

We welcome the report on the activities of the Independent Appeals Panel and appreciate the work and due diligence of the panel in reaching a decision on the first information appeals case which was submitted by the Active Observer team last Fall.

Timely information disclosure of environmental and social project documents is critical to ensuring public participation and to ensuring that the GCF's pro-active Information Disclosure Policy is realized.

We welcome that the IAP's findings confirmed CSOs' contention that the GCF did not comply with its pro-active Information Disclosure Policy when it asserted that disclosure of critical environmental and social documents on the Accredited Entities website was enough to comply with the project disclosure requirements as long as it was done within the required time limits.

Additionally, we welcome the IAP's findings that to comply with the IDP in the future, the GCF shall disclose ESS notifications and project documents to the Board and the Active Observers directly in addition to publishing them on the website.

We also welcome the IAP's recommendations that the Board should ensure the Secretariat complies with the Information Disclosure Policy and that any funding proposals that do not comply should not be included on the Board's agenda for consideration.

Lastly, we appreciate that after some delay most of the documentation related to this first appeal are posted on the GCF website on the Information Disclosure appeals page. However to comply with the recommendations of the IAP, the Secretariat should post the request from the Appellant, the Secretariat's response, and the IAP's decision in its registry as three separate documents, and not, as is currently the case, by posting the Secretariat response with an addendum of the original disclosure request. as part of the Secretariat's Response.