

Dear Board members and alternates,

As representatives from civil society organizations (CSOs), Indigenous Peoples' organizations, and local communities actively engaged in the proceedings of the GCF, we write to express our significant concerns about B.26 and GCF's organization of work within the COVID-19 context. First of all, the lack of information about whether, when, and with what operational procedures B.26 would take place, especially in light of the previous Board decision scheduling it for this week, is of significant concern. As key stakeholders and collaborators in the GCF, it is extremely difficult to plan and prepare for our active participation (as stipulated in the Governing Instrument) without information on the meeting's status. While we understand that the COVID-19 pandemic is leading to significant challenges and causing disruptions in schedules, the failure to provide any information about the discussion of plans for the meeting, even an acknowledgement that the meeting would not occur in June as intended, is a failure to operate the Fund in a transparent manner.

While the public at large is entitled to basic information about the next meeting, we are particularly concerned as civil society and Indigenous Peoples who follow the Fund's activities. While we remain concerned, we recognize the imperative for some of the functions of the GCF to continue during this uncertain time. The COVID-19 pandemic has reinforced the need to not be distracted from the urgency of the climate crisis and to provide climate finance and support country-driven, human-rights centred and inclusive climate action that builds the resiliency of people, communities, and systems. Thus, in this unusual time, we recognize that steps may have to be taken, including having a virtual meeting, to adapt normal practice to ensure that finance for climate projects flows to local communities. However, we stress that having a virtual meeting should not become the norm for the GCF, but rather a temporary measure to allow the work to continue in light of a global pandemic.

We seek transparency on the planned parameters of a virtual Board meeting, mindful of the novelty of such an operating procedure for the Fund. A wrong precedent could be set if core principles of transparency, inclusivity, and participation for observers are not ensured. If a virtual Board meeting is held, it is imperative that it be inclusive and not hinder the participation of civil society and Indigenous Peoples, including the critical ability of the CSO Active Observers to participate fully in the Board Meeting such as through the delivery of interventions prior to decisions being made, is imperative. The formal Board Meeting, of course, is not the only way that civil society engages during a Board meeting: if there are related pre-meetings, such as technical or informal meetings, the Active Observers should be able to participate as they do for in person meetings. Further, the GCF must maintain the live webcast to enable as full participation as possible.

Although this unusual circumstance of the pandemic requires the use of virtual platforms, this should not come at the expense of the meaningful participation of civil society, Indigenous Peoples, and local communities, as well as **all** Board Members. Steps must be taken to ensure that Board Members, especially those from developing countries can participate fully and in a manner that is fair and equitable. It is incumbent on the Board Members and Secretariat to pursue creative thinking and planning around this meeting, including involving civil society and Indigenous Peoples in these discussions and planning, such as having staggered start times that are suitable for various time zones.

The steps taken to plan or prepare for a virtual meeting, if it is to occur, should include consultation with and participation of stakeholders including representatives from civil society and Indigenous Peoples. Given the many challenges of a virtual meeting, various factors and modes of engagement will have to be considered to assure that all stakeholders are able to participate fully and effectively. Prior to any virtual meeting occurring, there should be a lengthy period of testing of platforms and consultation, including with the participation of representatives from civil society to assure adequacy of the proposed modality. Including representatives from civil society during this planning and testing can help assure that the proposed structures and platforms are adequate and will work for civil society as well as Board Members, the Secretariat, accredited entities, and other key stakeholders.

Given that this could be the first time that the GCF Board is convening virtually, we feel that it would be important to limit such an initial virtual meeting to core administrative and procedural issues to allow the GCF community to first gain familiarity and confidence in the fairness and inclusiveness of the process (for example, learning from the experience of the Adaptation Fund's virtual Board in late March 2020). This means the majority of decisions on policies, funding proposals, and accreditation would have to be delayed, and, if not delayed, there need to be clear limitations. For example, this would preclude taking decisions on complex and controversial policy issues, including the Strategic Plan, the PSAA, or investment parameters such as incremental cost/co-financing frameworks. Taking decisions on these important policies while still adjusting to the challenges of a virtual meeting would be inappropriate and may lead to decisions that are controversial and lack authority in future meetings. We do recognize, however, that certain policies may benefit from being advanced through discussions at the Board meeting, without taking decisions on course-changing policies, and we in general welcome discussions on inf. documents so that the Board continues to engage fully with the operations of the Secretariat especially as it works to continue its critical work during the pandemic.

If the Board were to consider project proposals in a first virtual Board meeting, this should be treated as a pilot with commensurate risk management. One solution would be to limit project consideration to SAP projects only, given that those are less complex financially and procedurally, micro/small scale, and low risk. This would minimize the possibility of high or medium risk projects being approved without appropriate due diligence, which could pose risks to communities as well as the GCF's reputation, including the ability of the Active Observers and other participating civil society and Indigenous Peoples to convey concerns about any harmful projects or their objection to certain projects.

Additionally, as the COVID-19 pandemic and the necessary measures in place to reduce its spread raises questions about participation at the local, national, and regional level, we have concerns that projects would go forward without critical input on both the design and implementation from local and affected communities and those who may be affected by the activities. It is also unclear how Free, Prior, and Informed Consent (FPIC) of Indigenous Peoples would be legitimately obtained in this context, given that in some countries only a small minority of Indigenous Peoples even have internet access. For example, in Colombia, only approximately 11% of Indigenous Peoples have access to the internet, and it is often those who have migrated to urban areas, far from the impact areas of potential projects, with this access. While virtual options may be considered or used, these could end up being skewed as many communities may still be precluded from participating due to technological barriers. Involving affected communities from the inception of a project is necessary for rights-based, country-driven climate action and leads to

more effective and sustainable projects. Lockdown in some countries has limited civil society and Indigenous Peoples' voice and their engagement in the critical matters affecting them including the GCF related activities. Thus, the GCF should be extremely cautious if it moves to approve any projects at this time, as appropriate stakeholder consultation and engagement is highly unlikely to have been met if conducted during the pandemic. Indeed, extra steps may need to be taken to verify that meaningful participation has in fact taken place at the local level. These concerns about participation at the local, national, and regional level are not only related to projects, but also to readiness and development of national adaptation plans and country programmes, among others.

Further, consideration of any policies or projects at a virtual meeting would have to be accompanied by the timely disclosure of all documents in line with the Information Disclosure Policy and ideally even earlier than the 21 days required in recognition that the current situation presents challenges for coordination among constituencies.

If the GCF is unable to proceed with the approval of projects at the pace anticipated prior to the pandemic, there are still many ways it can use this time to strengthen climate action and strengthen the foundation for the Fund's activities in a post-pandemic world.

The economic recession resulting from the measures countries have taken to face the pandemic also poses the opportunity of recovery plans that address the climate and environmental crisis that affects the whole planet, giving extra leverage for the implementation of adaptation and mitigation projects, such as some of the ones supported by the GCF. This implies an extra responsibility and opportunity for the Fund.

As approximately 70 projects are now under implementation, there is a key opportunity to fully operationalize the monitoring and accountability framework and glean lessons learned and best practices from these projects that can improve outcomes of these projects as well as inform project design and the prioritization of the project pipeline. The GCF has fundamentally shifted into a new phase in GCF-1, and even in lieu of an approved strategic plan, there is scope and mandate to ensure the GCF is a continuously learning organization. With some projects already halfway through their implementation, ensuring lessons are recognized now will position the GCF to be an adaptive, flexible learning institution, capable of responding to ensure its investments yield the anticipated results. Part of this work is monitoring project progress and discovering what practices, procedures, or modes of technical assistance--at the Secretariat, accredited entity, or executing entity level--should be adjusted and improved as other projects come under implementation, to ensure that expected outcomes are achieved and projects are successful.

Additionally, providing greater transparency into the project pipeline now will enable civil society and Indigenous Peoples to engage and strengthen projects before they come before the Board at a later date. (See also, our recent CSO comments on the information disclosure policy.) Earlier release of those project ideas and proposals in draft form can contribute to a situation where due diligence can be performed despite the high numbers of projects we may see at post-pandemic Board meetings.

Another way to strengthen the ability of the GCF to implement effective projects post-pandemic is to take advantage of this opportunity to deploy more learning and engagement opportunities virtually, following the example of the SAP e-learning course. Stakeholders worldwide continue to have questions about the

Fund and its operationalization, and though virtual learning is not accessible to everyone, having more multilingual courses, webinars, or other learning opportunities can only lead to greater engagement by stakeholders whose informed participation will contribute to more robust climate action.

Like the Green Climate Fund, the undersigned organizations are committed to enhancing the ability of the most vulnerable countries to respond to the impacts of climate change. Responding to climate change requires collective action at the global, national, and local levels, and must respond to local needs, rights and realities. While civil society and Indigenous Peoples have many diverse ideas and perspectives on how the GCF can operate during these times, we cannot effectively share them without mechanisms for doing so. As you can see, we have several concerns. We request not only a response as to the state of discussions regarding the next Board meeting, but an opportunity to engage in discussions about the scope, nature, and technicalities of that meeting as well as the larger, ongoing work of the GCF to ensure that decisions made about how to proceed at this time ensure effective participation of civil society, Indigenous Peoples, and local communities.

Sincerely,

Abibiman Foundation

AbibiNsroma Foundation (ANF)

Actions Vitales pour le Développement durable (AVD), Cameroon

Africa Coalition for Sustainable Energy and Access (ACSEA)

Alliance for Empowering Rural Communities (AERC-Ghana)

Alliance Marocaine pour le Climat et le Développement Durable Maroc

Asian Peoples Movement on Debt and Development (APMDD)

Association des Enseignants des Sciences de la Vie et de la Terre au Maroc (AESVT-Maroc)-Morocco

Bangladesh Krishok Federation, Bangladesh.

Bank Information Center (BIC)

Both ENDS, the Netherlands

CAN-RAC

Canadian Council for International Cooperation (CCIC)

CARE International

Center for International Environmental Law (CIEL)

Centre for 21st Century Issues (C21st)

Centro para la Autonomía y Desarrollo de los Pueblos Indígenas (CADPI), Nicaragua

Christian Aid

Civil Society Network on Climate Change - Malawi

CLEAN (Coastal Livelihood and Environmental Action Network), Bangladesh

Climate Watch Thailand, Thailand

Community Science Centre, Vadodara

Conservation Action Practitioners (CAP) - Rwanda

Enda Energie, Senegal

EnGen Collaborative, USA

Equidad de Género: Ciudadanía, Trabajo y Familia, México

Federación Indígena Empresarial y Comunidades Locales de México. (CIELO)

Forests and Farmers Foundation, Thailand
Fundación Paso a Paso A.C. Red de personas Indígenas con Discapacidad, México
Fundación Ambiente y Recursos Naturales (FARN), Argentina
Germanwatch e.V., Germany
G W & L Consults Ltd Nigeria
Heinrich Böll Stiftung Washington, DC
Indigenous Environmental Network
Interamerican Association for Environmental Defense (AIDA), Latin America
International Centre for Climate Change and Development (ICCCAD) Bangladesh
Institute for Climate and Sustainable Cities (ICSC), Philippines
International Trade Union Confederation (ITUC)
International Work Group for Indigenous Affairs (IWGIA)
Jeunes Volontaires pour l'Environnement (JVE), Cameroon
Jeunes Volontaires pour l'Environnement (JVE), Côte d'Ivoire
Kasa Initiative Ghana
Livelihood Improvement Programme of Uganda (LIPRO)
Movimiento de Mujeres Indígenas Wangki Tangni, Nicaragua.
Nepal Federation of Indigenous Nationalities (NEFIN), Nepal
ONE ROOT MONGOLIA
Oyu Tolgoi Watch
Pan African Climate Justice Alliance (PACJA)
Pastoralists Indigenous Non Governmental Organizations Forum (PINGO's Forum), Tanzania
Power Shift Africa
Réseau sur le changement climatique, RDC
Rivers without Boundaries Mongolia
Sampan'Asa Momba ny Fampandrosoana FJKM (SAF/FJKM), Madagascar
Sierra Leone Consortium for Climate Change & Sustainable Development (SLeCCSuD)
Support for Women in Agriculture and Environment (SWAGEN)
Tebtebba Foundation
Transparency International - Bangladesh
Transparency International Kenya
Transparency International - Korea
United Civil Society Organisations for National Development (UCSOND)
WECF - Women Engage for a Common Future, International
Women's Environment & Development Organization (WEDO)
Women Organizing for Change in Agriculture and Natural Resource Management (WOCAN)
Youths for SDGs Kenya