

GCF Observer Network of Civil Society, Indigenous Peoples, and Local Communities

Intervention on

Partnerships and Access Strategy**Access the document:** <https://www.greenclimate.fund/document/gcf-b39-18-rev01>

We have strong concerns about this proposed Partnerships and Access Strategy and call on the Board not to adopt this document at this meeting.

We absolutely need to improve access to climate finance, and we have championed that cause throughout our history as an observer network. Yet this draft does not address key access issues. Under the strategic plan, it was supposed to “clearly articulate the different pathways for enhanced access to GCF financing, and how GCF can engage a range of partners consistent with their own mandates.” The draft we have before us does not do that. It completely ignores one of the core reasons the GCF was created to be a different kind of climate finance institution – to **provide direct access to local communities, civil society, and Indigenous Peoples**.

Failing to recognize and value civil society and Indigenous Peoples as partners in country programme and pipeline development, project/programme conceptualization/origination, design, implementation, or monitoring is unacceptable. Indigenous Peoples are not mentioned even once in the strategy. None of the access priorities focus on access for local actors and rights-holders or the many ways in which direct access could be enhanced through partnership models with them.

Additionally, this strategy opens the door to potential weakening of many of the policies that make the GCF a leader and pioneer in transformative climate action. The decision fully greenlights the idea of principles-based policies without real definition or detail on what that would mean, which could undermine and weaken the existing Gender, Indigenous Peoples and Environmental and Social Policies of the Fund. Such a decision would be significant and would entail reforms of many policies, yet they are not listed. Indeed, there has been a years-long endeavor to develop the GCF’s long overdue own environmental and social safeguards, envisaged nearly since the GCF was operationalized; the adoption of this underbaked strategy, circulated last month, could undermine that important work.

The only policy that this decision does clearly mark for quick reform is the Monitoring and Accountability Framework, which has been a cornerstone of efforts to ensure evaluation of projects, programmes, and accredited entities. While the Secretariat is stating an intent to redouble its efforts on monitoring, evaluation, and learning, this could, in fact, undermine that. A key first step would seem to be to instead assess how this Framework has been implemented and the challenges in its implementation, in particular with respect to the mandate for participatory monitoring.

The eagerness with which some board members want to pursue a vague idea of access, noting how unclear this strategy is, without a reflective moment of assessment and learning from the past, is worrying. We do have the history of an underbaked Accreditation Strategy being pushed through to adoption and yet failing to solve the real issues, including access to funding for DAEs. And here the potential downsides for the people that should matter the most, the beneficiary communities the GCF should serve, seem to be under-assessed and under-considered.

A shift to principles-based policies ultimately shifts the risk burden of a project or programme to the people on the ground, particularly those most vulnerable, and away from the GCF and its accredited entities. Critically, it also raises the question of the ability of the independent functions of the GCF to fulfill their mandates and ensure accountability. This potential shift from a compliance to a risk and opportunity-based review of projects could have extremely negative impacts for accountability, particularly accountability to and the right to remedy and redress for communities and people affected by projects and programmes. This is especially problematic for those bigger multi-country and private sector programmes and approaches that already raise serious concerns when it comes to accountability, transparency and satisfaction of grievance and redress provisions.

The Secretariat doesn't need this misguided strategy to enhance access, as the operational actions outlined in the presentation showed. It already has the tools to enhance access in ways that are substantive. The new readiness strategy has been adopted and should be transparently operationalized, which could and should support access and enhanced transparency around the life cycle of projects and programmes to engage more local actors in support of origination, design, implementation, and monitoring. The Secretariat can also tackle internal processes surrounding funding proposals; including, among others, improving communication and cooperation with DAEs; reducing the burden of climate rationale documentation; and ensuring that the GCF does not impose an implicit co-financing requirement before moving proposals forward.

Indeed, the Secretariat could also publish the AE self-assessments required under the Monitoring and Accountability Framework, in which IAEs are supposed to report on the support they provide to direct access entities for accreditation and capacity-building. Instead of reforming the Monitoring and Accountability Framework, let's first use this existing provision to enable identification of best practices and cross-learning.

An approach to gut and change the system without seeing how existing policies and practices, including under Efficient GCF, can support greater access is the wrong one. Much deeper collaborative work with Board members and advisors as well as civil society and Indigenous Peoples is merited before bringing a version of this strategy forward. If the Secretariat and Board are actually serious about upholding commitments to Indigenous



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Peoples rights and inclusive processes, the lack of consultation with the Indigenous Peoples Advisory Group and with broader Indigenous Peoples organizations alone should merit another round of consultation. More consultation would give time to ensure consideration of the full range of access issues, from multilingualism to enhancing direct access, reducing climate rationale burden to ensuring swift access to grant-based finance without co-financing required.

We know access needs to be improved, but let's not let the urgency to act prevent us from doing it correctly.

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