

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

Intervention on

**Consideration of Accreditation Proposals****Access the document:** <https://www.greenclimate.fund/document/gcf-b42-03>

We welcome this batch of eight accreditation applicants, seven of which are DAEs while the one international AE is focused exclusively on providing support for locally- and Indigenous-led and -owned activities through on-granting. While this is something that we would like more AEs to explicitly support, we are glad to have a focused on-granting entity with this particular experience and expertise as a key GCF partner and hope other entities with such expertise or similar, such as feminist funds, can follow its lead. As always, it will be critical that, once accredited, there is a focus on these entities being able to bring successful funding proposals.

We notice that all of the applicants are recommended for accreditation with conditions, which is allowed under the current accreditation framework and facilitates the engagement of DAEs with the GCF. In one case, for a DAE from an LDC, the conditions have been outlined for the appropriate stages at which they need to be met in the DAEs' continued engagement with the GCF. This applicant DAE already had substantive readiness support; conditions serve as an additional tool to further their partnership with the GCF. Conditions should be seen not as a burden, but as a way to grow the capacity of AEs, and meeting them should be supported by the GCF.

In several cases, institution-level weaknesses in policies, frameworks and management systems are highlighted, such as the need to set up institutional grievance redress mechanisms or information disclosure procedures compliant with GCF project disclosure requirements. The establishment of such policies and frameworks are not only likely to benefit DAEs' access to other sources of climate finance, but will also protect future beneficiaries' rights and ensure they benefit from high standards in the provision of finance to build their resilience and support mitigation efforts.

In light of this, we are not left to wonder if the same batch of direct access applicants, the purported beneficiaries of GCF reforms designed to enhance their access to climate finance, would have made it to Board consideration under the proposed revised accreditation framework discussed here at B.42. Unfortunately, it appears that they would not. They would have failed the initial screening requirements, and many of the identified gaps would have been impossible to address within the proposed two months application/consideration window. Ostensibly, as we have argued before, the proposed reforms are likely to make it harder, not easier for direct access applicants to become accredited to the GCF, despite claims to the contrary.