

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

Intervention on

Reports on the Activities of the Independent Units**Access the documents:** <https://www.greenclimate.fund/document/gcf-b42-inf02><https://www.greenclimate.fund/document/gcf-b42-inf03><https://www.greenclimate.fund/document/gcf-b42-inf07>

We would like to take this opportunity to express our support for the independent units, respecting their independence and the vital role they play in the overall function of the GCF. We also appreciate their commitment to collaborating with civil society and Indigenous Peoples to strengthen their work, in particular highlighting the IRM & IIU's workshop in April not only for its inclusion of civil society alongside DAEs, but the intentionality with which they did so, announcing the application process months in advance to enable time for a meaningful selection process for funded civil society and Indigenous Peoples participants from across several countries, with room for input by the CSO Active Observers. We also acknowledge the IEU, in this same period, for continuing to value and draw upon the expertise within the observer network for its evaluations.

In particular, though, we wanted to highlight the information shared by the Information Appeals Panel. The Secretariat has recently chosen to reduce the public information available about information requests, resulting in there only being two requests listed for 2025, compared to dozens and hundreds in previous years.

We find this decision troubling for several reasons: First, it is incongruous to remove data at a time when the Secretariat claims to be updating the website in order to [quote] "provide better access to data and knowledge resources and give greater visibility to projects and impacts" [end quote].

Secondly, the removal is based on the Secretariat's claims that it can distinguish between substantive and non-substantive disclosure matters, as it would be inefficient to post requests about funding opportunities and any information already publicly available on the GCF website. Looking at the two disclosure requests on the website, though, we immediately see at least one request missing that should be published even under these restrictions. An observer requested information on sub-project level gender action plans for a specific programme under implementation, which are not available on the website. This speaks to our longstanding ask to the Secretariat to have this information routinely published for all approved subprojects. This request is not listed despite dating to February 16 of this year. Perhaps it has not been listed because the Secretariat has not fulfilled it within the 30 day Information Disclosure Policy timeline as they have said more time is needed? Of course the

Secretariat has repeatedly assured us that these required gender action plans for every subproject are indeed being submitted and the Secretariat has them, so why are they not disclosed and why has this straightforward request not been granted if it is merely a matter of simply locating the files in the Secretariat's records?

Third, removing the catalog of information requests removes an opportunity for learning, for some glimpse into what information website users may want, and for considering how the information that is already available could be made available in different and better accessible ways, given the difficulties many have in navigating a frequently changing website. And to the potential response that the list is then kept internally for the Secretariat's learning purposes, it is also relevant to civil society and Indigenous Peoples in the many outreach and capacity-building functions they perform about the GCF, as well as academia, and if it is kept internally, it should be easy to make public. This information also could prevent similar information requests from coming in again. In fact, we have long thought that the GCF would benefit by sharing more about the requests and if granted, linking to them for learning purposes.

Indeed, when we look at one of the two requests for 2025, we see the Secretariat denied access to 13 requested mid-term evaluations of projects on the grounds the information did not exist, when we have found 7 of those 13 interim evaluations on the AEs' websites, and indications the others do exist, such as the mention of one in the ToR for a final evaluation for the project. These missteps should be opportunities for learning, and more opportunities are likely within the hidden requests.

Fourth, when the observer network asks for more information, such as the public disclosure of the Secretariat's assessment or the annexes, even redacted, for private sector projects, we are often told that we should wait for the update of the Information Disclosure Policy. However, the review and update of the IDP has been consistently delayed and our longstanding position is that the principle of maximum access to information means these decisions should not have to wait on an update of the IDP; they are fully within the Secretariat's purview. Here the Secretariat is demonstrating it is indeed capable of making decisions to change practices related to information disclosure, but doing so in the wrong direction.

Disclosure of information and transparency is vital for an effective and trustworthy GCF. We ask the Board to guide the Secretariat to fully restore the information request catalog for 2025 and for the Secretariat to allocate appropriate capacity to fulfill all functions related to information disclosure.