

2026-2028 Work Programme of the Secretariat and Annual Administrative Budget of the GCF Secretariat, Board and Trustee

Access the document: <https://www.greenclimate.fund/document/gcf-b43-17>

The three year Secretariat work programme made for an interesting, if not illuminating read as it provides some important insights into the Secretariat's strategic thinking on the constituent elements of its "whole of Fund reform" agenda for the next three years which not only encompass the rest of the implementation period for the USP-2, but also the development of the USP-3 and the GCF's third replenishment efforts. We appreciate in particular the clarification it provides on the timelines and schedules for addressing some outstanding and long overdue policy mandates, while noting with concern some of the proposed activities outlined in the Secretariat's work programme results framework, including some with the potential to fundamentally change the nature of the GCF as a fund under the UNFCCC.

For instance, while we appreciate that in late 2026 after more than five years' delay we will now finally see the update to the GCF's Environmental and Social Safeguards, we are concerned about the simultaneously proposed review of inclusion policies. We as the observer network reject any efforts to open these policies at this time, as we fear that this would lead to a weakening, not an improvement of their substance and mandates. In fact, there is nothing wrong with the current GCF Gender and Indigenous Peoples policies; although the same cannot be said of their operationalization across the Fund's portfolio. This was also highlighted by the recent IEU evaluation on the Approach to the Indigenous Peoples Policy and the IEU gender synthesis report submitted for this meeting, and the failure of the Secretariat to report on the Gender Action Plan 2020 to 2023 indicators. What we have been demanding, and continue to demand, is the GCF fulfilling its own policies, and we hope taking these policy updates off the workplan helps provide the Board with the time needed to review implementation and provide directional guidance - for example, in reviewing the implementation of the IEU recommendations on the approach to the Indigenous Peoples Policy one year out, and in annually reviewing some reporting on the GCF's Gender Action Plan that should be provided as a matter of course.

The necessary pivot from opening the Gender and Indigenous Peoples' Policies to ensuring the intention, capacity, and resources to implement them includes the need for presenting an updated Gender Action Plan with strong indicators and accountability for commitments fulfilled, as well as a monitoring framework and indicators for tracking or reporting

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co-benefits related to and access for Indigenous Peoples as soon as possible. In this context, we also welcome the planned development and implementation of a dedicated Direct Access Framework for Indigenous Peoples included in the work programme in direct response to the IEU's findings, and remind the Secretariat that our network includes Indigenous Peoples, so outreach should extend beyond the Indigenous Peoples Advisory Group.

We note with particular interest the long overdue update of the observer participation guidelines but would like to point out that the Secretariat's approach thus far has failed to recognize the opportunity that this update offers for strengthening observer engagement at all levels, including when at the same time the update to the country ownership guidelines and the no-objection procedure is pursued, targets for implementation of locally led climate action components in GCF programming are set, and the new readiness program should offer opportunities for enhancing stakeholder engagement. At the same time, this update should not impinge on the independence of our observer network of civil society organizations, Indigenous Peoples, and local communities, affect our self-selection process for the CSO active observers, or undermine our clearly elaborated and transparent processes and procedures underpinning our ways of working. Our principles document stands on more than a decade of experience of our network members' engagement with the Fund.

We read with some concern some proposed actions included in the Secretariat's work programme results framework that seem to confirm the Secretariat's intention to move the GCF away from its role as a Fund under the UNFCCC towards a bank, whether this is in developing co-investment structures and investment partnerships, reviewing the current trustee's role or looking in the context of the preparations for the third replenishment at balance sheet optimization – a term that is more indicative of an MDB than of a fund. Neither of these have been approved by the Board as the direction it wants to see the GCF go, nor has there been any indication that these ideas are being presented to the Parties for COP or CMA guidance. We strongly caution the Board in approving the Secretariat's work programme as is, with those elements included, and thus implicitly endorsing an approach that needs much more deliberation, and governance intermediation, than this agenda item on the Secretariat's work programme and administrative budget allows for.