



44th Board Meeting of the Green Climate Fund

March 25-28, 2026, Songdo, Incheon, Republic of Korea

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

Intervention on

Consideration of Funding Proposals

Access the document: <https://www.greenclimate.fund/document/gcf-b44-02>

As we reviewed the 18 funding proposals for this board meeting, we noted many familiar trends and dynamics, and we are underscoring those that particularly speak to the choices before the Board this year in terms of programming directions.

We are indeed glad that of the 18 funding proposals, three are first time single-country projects, out of twelve single-country projects overall. We stress this metric because we have seen that many multi-country programmatic proposals never actually deliver subprojects for so many of the included countries that have issued no-objection letters. The multi-year delay in delivering policy guidance on programmatic approaches complicates our understanding of how the 8 programmatic approaches among the batch of proposals will deliver, and how such delivery will be tracked, even with programmes now making up a majority of the portfolio.

As, by definition, the full subproject pipelines of funding programmes are not confirmed prior to approval, it is vital that selection criteria, and indicative sectoral and geographic distributions are made visible, consistent with the principle of maximum access to information set out in the GCF's Information Disclosure Policy.

We are also keen to underscore the value of extending help to ensure that countries are able to come up with solid proposals as seen with five proposals assisted through the Project Preparation Facility. We also took note of the success of two first-time Direct Access Entities of reaching this point in their journey. As we see how the accreditation reform is enacted this year and whether it does bring more DAEs into the fold, we note with concern that a PSAA applicant is counted among the three first-time DAEs, toward Target 2 of the USP-2. We remind the Board the premise of the PSAA is that it is an only-time situation; not a DAE.

It is truly disappointing that despite repeated promises that subprojects of programmes will deliver individual Gender Action Plans, the GCF has never to our knowledge, disclosed a single subproject GAP, including in response to information requests. Issues of transparency and accountability continue to cloud these processes and betray the rights of beneficiaries, and addressing these issues in the upcoming update of the GCF Gender Action Plan will be as fundamental as setting new targets for ambition.

With a number of private sector funds put forward through the PSAA at this meeting, we are also extremely disappointed that these entities have passed through the Secretariat assessment while failing to have standalone, institutional gender policies. A programme level Gender Action Plan is no substitute for a policy that covers the whole entity, not least as it



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does not contain appropriate metrics to assess gender responsiveness at an institutional level.

As the PSAA pilot concludes, we are concerned with the substance, or lack thereof, of most of the PSAA proposals here, which seem to fall far short of applying equivalent standards to the regular approvals process across all relevant areas. As this Board sets forth the terms of reference for how the role of the AP is addressed moving forward, we see the evidence of their absence in this process, in Secretariat assessments that insist that “almost” is good enough, aspiration is equivalent to experience, and a lack of evidence of audits, financial management processes, environmental and social safeguards and/or absence of capacity as merely inconveniences to the PSAA applicants’ receipt of funding. These issues are particularly acute in the case of private investment funds.

Furthermore, one of our concerns is the continued promotion of Nature-Based solutions and climate-smart agriculture, which our colleagues closest to direct project beneficiaries, including Indigenous Peoples, find often override local and traditional practices with exploitative, market-based approaches not rooted in the ecological and social diversity of landscapes. It has been a longstanding position of this network that these terms, which have no standing or definition in the UNFCCC, are not elevated by the GCF, as interventions should instead be driven by local knowledge and needs.

As the LLCA Framework and Guidance are truly operationalized this year, and as a direct access mechanism for Indigenous Peoples is developed, we hope to see a refocus on traditional as well as Indigenous knowledge. We do not need the selling of innovative climate solutions by the latest aggregate fund looking for venture capital and the financialization of vague climate investments. A paradigm shift would be to support and scale solutions that genuinely change people’s lives and communities by addressing their needs.

Lastly, we recognize the push for brevity, and we wanted to share that we will be intervening on only a select set of funding proposals, with shortened interventions.