



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

Independent Evaluation of the GCF's approach to Country Ownership

Access the document: <https://www.greenclimate.fund/document/gcf-b44-06>

We welcome the Independent Evaluation Unit's 2025 Assessment on Country Ownership, which is timely given the ongoing update of the GCF's country ownership guidelines. The assessment expresses many of the long-standing issues within the Fund's processes and demands that the GCF observer network has consistently raised over the past years.

Reflecting on the key findings from the evaluation, we note that country ownership should not be aspirational but practically focused on reflecting the priorities and needs of countries determined through a whole-of-society approach through joint efforts in program development and implementation. These efforts among the GCF Secretariat, NDAs, and AEs must centrally focus on and integrate meaningful coordination and engagement with civil society, Indigenous Peoples, and local communities.

The evaluation noted that realising full country ownership is substantially weakened by the high concentration of GCF funds that is channeled through International Accredited Entities and through multi-country programmes, which undermines and directly contravenes the prioritization of increasing flows through direct access entities. Addressing this in the GCF must start, but cannot end with improving the often pro-forma procedural no-objection process with weak NDA engagement by design, but must also question the incentives set at the Secretariat level of quick programming over ensured integration in country needs by pushing large-scale multi-country programs.

Furthermore, we would also like to note on Finding 4.D.1, in that while we recognize that the no-objection procedure may pose challenges for private-sector actors, any reconsideration on the requirement of this procedure should not lower standards or dilute countries' right to know of and to shape their investment in their countries. On the contrary, this should be an opportunity to strengthen the process by ensuring early and continuous engagement with NDAs, as proposed under Recommendation 2, including through good practice guidelines for the private sector and Secretariat support to enable meaningful NDA involvement.

We also want to express our strong support on Recommendation 3, which calls for the establishment of a small-grant window for civil society and community-based organizations, in addition to the proposed designated window for Indigenous Peoples as recommended in the IEU report on Indigenous Peoples. This has been a long-standing demand from civil society and represents a crucial step in bringing the Fund closer to people on the ground and



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delivering tangible results for frontline communities, and is the main pathway to truly locally-led and locally-owned climate action. We also stress the importance of clear guidelines defining what constitutes meaningful consultation and participation, accompanied by consultation-specific reporting to NDAs and, from our perspective, to the public as well, to ensure that stakeholder engagement is not treated as a formality.

Finally, we further welcome the recommendation to treat direct access as the default option, with mandatory justification whenever domestic or regional entities could not be engaged.