

## **Independent Evaluation of the GCF's Simplified Approval Process**

**Access the document:** <https://www.greenclimate.fund/document/gcf-b44-05>

While we acknowledge the importance of assessing the Fund's operational modalities, we find that this evaluation presents an incomplete and, at times, misleading picture of the SAP's performance and potential.

We have serious concerns about the validity of this review. The methodology combines quantitative analysis with interviews, surveys, and case studies; however, while over 70 interviews were reportedly conducted, none included National DAEs and only two included Regional DAEs. In contrast, International AEs and the Secretariat were widely represented, and even a PSAA applicant with experience limited to higher-risk PAP proposals was consulted. The Indigenous Peoples Advisory Group and the CSO Network were likewise not interviewed.

The AE survey received 30 responses but does not specify the types of AEs that replied, limiting our ability to assess whether National DAEs were adequately represented in conclusions that directly concern them. This raises serious concerns about the reliability of the findings and the legitimacy of the recommendation to discontinue the SAP. This is particularly striking given that the report itself highlights that National DAEs demonstrate the shortest approval timelines and show some of the fastest progression from FP approval to FAA signing and implementation compared to equivalent PAP projects. Rather than justifying discontinuation, this should support strengthening the modality. It also represents a missed opportunity to extract lessons on how to improve the SAP. It should be in the interest of the GCF to safeguard and further strengthen a modality that enables the fastest delivery of public sector projects.

The recommendation to discontinue or replace the SAP also overlooks the rationale for which it was created and its demonstrated value. Despite room for improvement, the SAP remains a meaningful entry point for Direct Access Entities to develop small-scale, low-risk projects grounded in national priorities and local ownership. Importantly, it has also contributed—though not formally mandated—to strengthening DAE capacities through a “learning-by-doing” approach. If anything, the participation of International Accredited Entities should be reconsidered, and the SAP further developed as a simplified DAE window.

We also note with concern that the evaluation conflates Fund-wide procedural inefficiencies with SAP-specific issues. Bottlenecks such as excessive review loops and fragmented



## 44th Board Meeting of the Green Climate Fund

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

guidance are not inherent to the modality but reflect broader Secretariat practices. Similarly, the lack of differentiation within the Fund’s investment framework—across SAP and PAP pathways and risk categories—appears to be a core structural issue that discontinuing the SAP would not resolve.

At the same time, we support several constructive elements of the review. The emphasis on locally driven, community- and ecosystem-level approaches is welcome, as is the focus on replicating and scaling proven, fit-for-purpose interventions, instead of piloting untested approaches claiming to be “innovative” and “transformational”.

However, this requires clear and inclusive definitions of what constitutes “proven,” and “fit-for-purpose” solutions, along with transparent criteria for success. No cataloguing of these “proven” and “fit-for-purpose” solutions should take place without civil society being actively and meaningfully involved in shaping these definitions to ensure they reflect local realities and needs, and to avoid harmful interventions from being locked in to the catalogue. We also support the development of systems to track and replicate successful project models to enhance transparency, accountability, and learning across the portfolio.

Equally important is that the SAP’s scope remains within ESS Category C to preserve its role as a low-risk, high-access window characterized by simplicity, speed, and safety. Expanding it to higher-risk categories would undermine this balance and likely shift the modality toward more complex interventions. The SAP should remain focused on public sector projects and accessible pathways for national institutions. Given the urgent needs of vulnerable populations, there remains a clear demand for small-scale, low-risk investments across developing countries.

We therefore urge the Board to reject recommendations to discontinue or replace the SAP, and instead direct the Secretariat to focus on improving and strengthening it in line with its original purpose—enhancing access, building national capacity, and supporting the replication of effective, locally-led solutions.