



45th Board Meeting of the Green Climate Fund

June 29 - July 2, 2026, Dushanbe, Tajikistan

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

Intervention on

Consideration of Funding Proposals

Access the document: <https://www.greenclimate.fund/board-document/gcf-b45-02>

We welcome the strong focus on adaptation in the package of 10 funding proposals presented at this Board meeting.

We are disappointed, however, that these proposals were published on a Friday rather than Monday, failing to comply with the Information Disclosure Policy and resulting in most of a working week lost, making it harder for communities and local organizations, in particular, to share input and analysis prior to Board consideration. For this meeting, if the GCF's disclosure standards were respected, the observer network could have brought you more feedback from communities with which two proposals were discussed, but limited interaction time and translation needs hampered us in doing so. As the Information Disclosure Policy is due to be updated and as the Fund advances its work on Multilingualism, one of our longstanding, minimum asks is for proposal summaries to be provided in the same languages in which we receive ESS disclosures.

This speaks to the broader need for all GCF processes, from website updates to information release, to center beneficiaries. We have noted the term 'client' emerging in Secretariat documentation once more, and we emphasize that the GCF's clients are the beneficiaries and potential beneficiaries of its funded activities, not the AEs or country governments.

In that vein, we appreciate the effort to implement Locally-led Climate Action. However, we note that FP307, one of the three proposals tagged as featuring high levels of LLCA, invests in agribusiness and does not directly benefit smallholders, so is not meaningfully 'locally-led'. Moving forward, we welcome clearer parameters and criteria on how LLCA is operationalized and look forward to further engaging with the Secretariat as it builds capacity in this area.

We are also glad to see that several proposals acknowledge the imperative of grant-based climate finance for public goods. Providing grant-based climate finance for public goods is part of the GCF's value in the overall climate finance ecosystem.

What the GCF should not be used for, though, is as an additional funding source for MDBs seeking to fill in gaps in the affordability of their lending portfolios. If MDBs are envisioned to take on a larger share of climate finance in line with plans such as the New Collective Quantified Goal, climate considerations should be part and parcel of the MDBs' business models. It makes no sense to outline the challenging environment for replenishment only to then allocate the GCF's limited funds to fill funding gaps at the far better resourced MDBs.



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While FP307 is the only equity fund in this roster of proposals, the ITAP has again commented on the uncertainties inherent in *ex ante* assessments of this type of programme, and this is a clear signal of a policy gap, the guidance on programmatic approaches, that needs addressing.

We once again express concern about the trend to bring forward FPs in the host country of a Board meeting at that Board meeting. Hosting a Board meeting should neither penalize nor incentivize funding proposals, which should be prioritized the same way regardless of meeting location.

We welcome two first time DAEs, but note these are SAP proposals at the micro-level. The contrast in this meeting is particularly stark, with DAEs putting forward SAPs, and all of the FPs put forward by IAEs. Support for DAEs must be targeted for funding proposals across a range of sizes, to move beyond the GCF being perennially stuck at only 20% funding flowing to DAEs. Relatedly, we would like to highlight SAP071's Gender Assessment and Gender Action Plan as a strong example of high-quality gender documentation at entry by a DAE, especially as we will not be delivering interventions on all funding proposals and will be delivering shortened interventions for most, in acknowledgement of our time this afternoon.