



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

Updated Gender Action Plan for the GCF (2026-2031)

Access the document: <https://www.greenclimate.fund/board-document/gcf-b45-17>

While the GCF observer network of civil society, Indigenous Peoples, and local communities appreciates that action has been taken toward updating the Fund's Gender Action Plan, and recognises the efforts made to enhance the draft following consultations in April, we urge the Board not to adopt this GCF GAP without further improvements.

First, we still do not see this GAP "actively contributing to the implementation of activities" of the nine-year Belém Gender Action Plan, as required by COP30 guidance and as expected by Parties who adopted the Belém GAP with the understanding that gender-responsive climate action would be supported by the UNFCCC financial mechanism. Future mapping against the Belém GAP is needed particularly on gender-and age-disaggregated data, access to climate finance for grassroots women's organizations, Indigenous Peoples, and local communities, and the thematic scope of interventions.

Secondly, but no less importantly, the draft GAP places greater emphasis on institutional and process-level indicators, while downplaying the significance of gender-responsive implementation across the portfolio for concrete gender equality outcomes. This is despite mounting evidence from both the IEU evaluation on the Gender Approach, and analyses by civil society pointing to project-level gender assessment and gender action plan quality issues at entry level, compliance-based approaches not necessarily translating into impact, and calls for stronger accountability mechanisms to document and provide feedback on project gender results, all of which could have been adequately addressed through the GAP update. There remain very few gender specific outcome-level indicators, both qualitative and quantitative, to enable meaningful comparison across projects and aggregation of results at the portfolio level. While the draft GCF Gender Action Plan commits to piloting a gender outcomes verification approach, it is unclear whether this will measure community-level outcomes or benchmark progress against country-owned gender frameworks or the Belém Gender Action Plan. At a time when the watchword for the Fund is impact, a five year GAP that doesn't deliver gender-equality outcomes for the beneficiaries of its projects and programmes is not an effective plan.

Third, some of these improvements would benefit from greater alignment with other ongoing processes, such as the update of the Information Disclosure Policy, development of the Harmonized Results Management Framework, and even the approach to multilingualism to align with the imperative of transparency with stakeholders and rightsholders in project



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design, implementation and monitoring. As we consider what transparency and accountability should mean, the GAP is silent on sub-projects, when the majority of approved funding in the portfolio is under a programmatic approach and so far not a single sub-project GAP under approved programmes has been disclosed on the GCF website.

Delaying adoption does not have to mean delaying momentum on advancing the GCF's approach to gender-responsive climate finance. Instead, it allows key actions that should have preceded this draft to be taken, informing an adequate approach to potential approval at B.46. Between B.45 and B.46, the Board could request the Secretariat to complete a mapping and gap analysis against the Belém GAP and to more fully integrate the IEU's core recommendation on focusing the GCF's gender actions to shift from mere compliance to accountable outcomes. It could also instruct the Secretariat to conduct the proposed learning needs assessment of accredited entities, National Designated Authorities and delivery partners to ensure activities are meeting the needs of partners supporting the implementation of gender-responsive climate finance across the portfolio.