GCFWATCH

46th Board Meeting of the Green Climate Fund

October 26-29, 2026, Songdo, Incheon, Republic of Korea

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

Intervention on

FP318: Regional Programmatic Approach on Climate Action (RPACA)

Access the document: https://www.greenclimate.fund/board-document/gcf-b46-02-add11

GCF's efforts to bring a regional perspective and a programmatic approach to financing adaptation priorities of Pacific SIDS are welcome. The ADB's request for 250 million USD in grants support and forthcoming grant proposals by two Pacific regional implementing entities, the SPC and SPREP, will make the Regional Programmatic Approach to Climate Action programme the single largest GCF programme commitment.

However, we have concerns about the financial structure of ADB's contribution to the programme to support up to 22 infrastructure subprojects across 14 Pacific SIDS. Six out of the 14 countries are rated as being in high debt distress and others have reached their debt ceiling for external borrowing. Blending 467 million USD in sovereign loans—including 220 million in non-concessional loans—into an adaptation package for countries already facing unsustainable debt burdens is highly problematic. With infrastructure sub-projects only indicative and not fully appraised and structured, the blend of ADB loans, ADB grants and GCF grants under each sub-project is unclear. At minimum, there should be a formal policy trigger to convert loan components into 100% grant allocations in case a climate catastrophe hits. Additionally, a clear covenant is needed to make the provision of the full GCF grant resources contingent on the full commitment of the ADB grant provision of 342 million USD. We also question the use of GCF grants under component 1 as the contingent capital in five national guarantee mechanisms for MSME adaptation lending rather than deploying it directly to MSMEs via more affordable loan rates.

By receiving yet another large scale highly concessional GCF funding package, the ADB's share of the GCF's entire portfolio is now at 8.3%, close to the 10% concentration risk threshold. There is also significant execution risk with the programme's parallel focus on building the capacity of national entities at the same time that they are expected to start subproject implementation, and the proposed Category A Alaoa Multipurpose Dam sub-project for Samoa is in proximity to a key biodiversity area.

Regarding Indigenous Peoples, the extensive design-stage consultations, while welcome, do not in themselves constitute FPIC. We ask for guarantees for FPIC documentation to be disclosed for each subproject that affects Indigenous Peoples and customary land, reef or water rights. And while the programme-level Gender Action Plan promises gender-responsiveness and inclusion, the $3.7 million USD budgeted is less than 0.3% of the

total programme finance and not sufficient for the implementation of subproject specific GAPs.

Lastly, with respect to the incorporation of climate smart agriculture, coastal fisheries, and cross-sectoral energy-water-food interventions in the programme, the proposed delivery mechanisms have structural flaws that compel small-scale Pacific farmers and fishers to take on commercial or micro-level debt to adapt to catastrophic climate shocks *and* leave customary gendered land tenure inequalities unaddressed. The programme's commercial lending model also risks sidelining non-commercial, informal, and subsistence producers—the vast majority of rural Pacific livelihoods who suffer the highest exposure to climate shocks and food insecurity.