GCF WATCH

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

Overarching Comments on Several Major Change Requests (Funding Proposals)

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

We have overarching comments on these approved funding proposals.

We appreciate the transparency of bringing these change requests to the Board for its consideration and approval in line with the current Policy on Restructuring and Cancellation. Secretariat-prepared documents are instructive and contribute to the overall learning of the Board and the broader public. Considering the increasing scale, complexity and maturity of the GCF's portfolio changes and cancellations remain likely.

Three of the five change requests presented here ask to add additional host countries following no-objection of the countries already included. This is largely unproblematic, although it raises questions on whether this might increase the competition among countries in multi-country proposals, especially if the increase in the number of recipient countries is not accompanied by a changed allocation and/or increased available financing, noting there was indeed additional co-financing secured at the programme level for FP286. The consultations with existing partner countries were thus good to see. In the case of FP205, six host countries will be added but no information on implications for allocation was included.

The issue of adding more host countries to multi-country programmes also raises the question whether this results in a commensurate update of the programme-level gender assessment and Gender Action Plan to guide the gender-responsiveness of potential investments in these added countries, which only in one case is explicitly addressed as undertaken in the provided documentation.

In contrast, the FP177 Cooling Facility, drops three original host countries, resulting not only in a reduction of the GCF funding contribution and the World Bank's co-financing, but also a significant reduction of 35% of envisioned mitigation benefits. We welcome that this restructuring proposal reduces the original lending rates for Sri Lanka to reflect Sri Lanka's debt stress and refocus on public cooling infrastructure. It is notable, though, that for this large-scale programme, under implementation since mid-2022, so far only 3% of GCF funding has been disbursed to the World Bank.

Lastly, the requested change for FP086, EBRD's Green Cities Facility, under decision B.21/15 provides a good learning opportunity and helpful precedent on how to deal with

accountability in large-scale programmes, especially in the absence of a GCF policy on programmatic approaches. In this case, conditions at approval required the AE to come back to the Board to request a second (and a potential third) tranche of funding, following the verification of fulfilled conditions. Such a tranched approval does allow the Board a check on the implementation status of large scale programmes. In this instance, it also required confirmation by the participating countries that their no-objection remains valid. This should be a standard procedure for large-scale programmatic approaches going forward.