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

Policy on Contributions from Other Sources

Access the document: https://www.greenclimate.fund/board-document/gcf-b46-13

We as the Observer network often invoke the original vision for the GCF and the deliberate efforts to design a new and transformative fund, expressed in part through its Governing Instrument (GI), so while we recognize that the potential for contributions from other sources was indeed foreseen as a possibility there, what was never intended were arrangements that threaten the governance and authority of this balanced Board ultimately accountable to the COP and CMA. Creating the potential for non-public contributors to assume any level of influence over the Fund's directions and priorities contravenes the GCF's role in the UNFCCC climate architecture and undermines the Board's oversight and authority.

Contrary to assertions that this policy is aligned with the GI, the proposal could create a parallel, or several parallel structures that would run directly counter to the GI. The "Enabling Mechanisms" are nothing more than a way to bypass the GI's principles and provisions. Furthermore, the GI was adopted by the Parties to the UNFCCC and any change to the Fund's party-driven governance would have to be done through and by the COP.

While a targeted allocation would not formally control individual projects, it could still shape what the GCF prioritizes and who gets access to these earmarked funds. The shifting of priorities could make access more, not less, complicated and restrictive for some countries and actors, encourage competition for particular pools of money, or weaken the intentionality and coherence of the current allocation framework. Targeted allocations could lead to priorities and directions being effectively decided outside of the Boardroom, rendering this extensive USP-3 process moot.

Correspondingly, creating "advisory structures" could give an important degree of influence to undemocratic and unrepresentative stakeholders, in exchange for funding - a "pay-to-play" set-up. Furthermore, it's unclear how public transparency, civil society participation, or the representation of developing countries, Indigenous Peoples, local communities, or other affected communities would be guaranteed.

The proposal's due diligence process must exclude sources that are investing in or derive their wealth from fossil fuels, or other activities that have detrimental impacts on the climate, or that have a history of ignoring or violating human rights and the rights of Indigenous Peoples. Contributions to the GCF should not allow actors to greenwash climate-destructive history and behavior. Safeguards are needed against conflict of interest, where a contributor stands to benefit from the activities its resources support.

Other sources should contribute to the GCF as a public good, as a fund understood to serve the UNFCCC, as an institution over which they have no influence, in return for simple recognition of aiding in combating the defining crisis of our time. The GCF must be governed by the needs and rights of the countries and peoples it serves, not by its contributors' wallets.