

Effectively Integrating Gender Considerations into the Six Essential Operational Modalities and Policies for Decision at the 7th GCF Board Meeting

With decision 3/CP.17, the Green Climate Fund (GCF) made history as the first global climate finance mechanism to include gender equality concerns at its inception by including specific commitments on gender in its Governing Instrument,¹ including by mandating the Fund as a guiding principle to strive to maximize the impact of its funding for adaptation and mitigation while “taking a gender-sensitive approach” (para.3).

[Bali Decision B.06/07](#) requests the Secretariat to prepare a draft gender policy and action plan for discussion at its seventh Board meeting. It also requests the Secretariat to integrate gender considerations in the preparation of draft policy documents and draft documents containing operational modalities, including those for consideration by the Board at its seventh meeting.

However, the [provisional agenda](#) for the seventh GCF Board meeting – following a [suggestion by the Board Co-Chairs](#) to focus the upcoming Songdo meeting only on the goal of adopting decisions on the six remaining essential requirements for the initial resource mobilization of the Fund – does not include an agenda item on considering the draft gender policy and action plan. While this is regrettable, the mandate of Decision B.06/07 to integrate gender consideration into the operational modalities proposed for the decision by the Board in Songdo still holds and demands Board action.

It is only fitting to consider the gender-sensitive approach in conjunction with the Fund’s key policies required to “receive, manage, programme and disburse financial resources” (Decision B.05/17), as gender mainstreaming will contribute to the paradigm shift the GCF hopes to support with its interventions and will increase their overall effectiveness.

The following are some key recommendations by the Heinrich Böll Foundation North America² for integrating gender into the decisions on the six remaining essential policy requirements for resource mobilization that will be the focus of the seventh Board meeting in Songdo. The expected decisions from Songdo will result in a number of concrete actions to be elaborated in the gender action plan, which is to be considered together with the Fund-wide gender policy at the eighth GCF Board meeting.

Guiding Framework and Procedures for Accrediting National, Regional and International Implementing Entities and Intermediaries, Including the Fund’s Fiduciary Principles and the Standards and Environmental and Social Safeguards ([Document GCF/B.07/02](#)).

- **Experience with, commitment to and capacity for gender-responsive funding implementation** (but not necessarily the existence of an entity’s gender policy or gender action plan) **should be mandatory for accreditation** of national, regional and international implementing entities and intermediaries. This capacity should be considered a core criterion, even under a scaled risk-based approach to safeguards application (Annex II, Section 4.1) and under a possible tiered accreditation approach (para. 38). For national entities seeking accreditation under the direct access track, support for capacity building on gender should be provided under optional readiness activities as part of the accreditation process.
- **Gender expertise and competency must be included on the proposed Accreditation Panel** (Annex II) tasked in conducting the review of applications for accreditation, if necessary by using **external gender technical experts** (paras. 42 and 43).

¹ Explicit gender reference in the GCF Governing Instrument are included under I. Objectives and Guiding Principles, Paragraph 3; II. Governance and Institutional Arrangements, Paragraphs 11 and 21; V. Operational Modalities, Paragraphs 31; XII. Stakeholder Input and Participation, Paragraphs 71.

² Author and contact in Songdo: Liane Schalatek (liane.schalatek@us.boell.org).

- The accreditation framework must take a “Do-no-harm approach” and require **compliance with international human rights conventions**, covenants and declarations, including UNDHR, UNDRIP, CEDAW and ILO conventions; respect collective property rights; free, prior and informed consent (FPIC) and **explicitly and pro-actively support gender equality and women’s empowerment**.

Using the IFC Performance Standards as the Fund’s interim environmental and social safeguards (ESS) falls short in that regard and does not constitute international best practice on considering human rights and gender (for example, the Asian Development Bank’s safeguards have stronger gender provisions). While the detailed guidance notes on the IFC Performance Standards feature some gender aspects selectively (para.36), the language of the Performance Standards themselves does not elaborate gender equality and women’s empowerment as a core principle which has to apply to all GCF-funded projects, as well as individual projects or activities within a programme. As proposed, the interim IFC Performance Standards in conjunction with the IFC guidance notes serving as interim GCF environmental and social safeguards are not sufficient to fulfill the GI mandate for a gender-sensitive approach and should not serve as the basis for developing the Fund’s own ESS.

Initial Proposal Approval Process, including the Criteria for Programme and Project Funding **[\(Document GCF/B.07/03\)](#)**

While the document does integrate a number of gender considerations throughout the proposed project and programme activity cycle, the draft decision could be strengthened. Specifically,

- **Comprehensive and inclusive multi-stakeholder input and participation, acknowledging women’s special contribution**, in line with the Governing Instrument paras. 51 and 71, must be an integral part of the initial approval process throughout the project and activity cycle. This should cover the concept stage as well as the preparation and appraisal phase (as proposed in Annex II), but must also include **gender-sensitive participatory monitoring in the implementation, commissioning/launch and impact periods**, in line with para. 57 of the Governing Instrument. Such participatory monitoring and reporting has to cover the application of environmental and social safeguards during the implementation period to allow for course correction if needed during implementation, not just ex-post complaint and/or redress. Monitoring and evaluation of outcomes and performance must also include outcomes and performance in supporting gender equality and women’s empowerment.
- The Secretariat should develop and implement **guidelines on the operationalization of the initial proposal approval process** for project and programme funding (Draft decision in Annex I), which provide detailed recommendations and templates and tools to implementing entities, intermediaries and executing entities **on how to implement the gender considerations of the Fund’s project and programme cycle** (such as compliance with gender policy to be developed and the Fund’s safeguards; the preparation of mandatory proposal gender assessments and gender-sensitive comprehensive stakeholder engagement throughout the activity cycle).

Initial Results Management Framework of the Fund ([Document GCF/B.07/04](#))

The gender-sensitive approach to GCF funding is not a separate co-benefit, but a cross-cutting mandate and therefore part of the paradigm shift that the GCF wants to achieve in the context of sustainable development. The initial results management framework of the GCF must reflect this. Therefore:

- Gender considerations must be integrated into the performance measurement frameworks **for both mitigation and adaptation at all proposed results measurement levels** from the project results level (output) to the programme result level (outcome) to the paradigm-shift level (transformational impact).

As currently proposed (Annex I), the initial results management framework of the Fund does only specify one gender-sensitive project/programme outcome for mitigation (Annex I, para (b) (iii) 1)), but does not include gender considerations on the higher Fund-aggregate impact and paradigm-shift levels of the logic models for both mitigation and adaptation.

It is recommended to change the proposed mitigation objectives and impacts as follows (change in **BOLD**):

Paradigm shift objective for mitigation:

*Shift to low-emission **gender-equitable** sustainable development pathways*

Strategic level impacts for mitigation:

*Increased **gender-sensitive** low emission energy access and **low-emission** power generation*

*Increased access to **gender-sensitive** low emission transport*

For adaptation, the paradigm shift objective should be changed to read as follows (change in **BOLD**):

Paradigm shift objective for adaptation:

*Increased climate resilient **gender-equitable** sustainable development*

- A core set of paradigm-shift indicators for the GCF at the Fund-wide/aggregate level need to include **impact measurements on sustainable development and gender equality**. They can be achieved via **smarter core indicators that are gender-sensitive and measure multiple benefits**, for example a proposed mitigation core indicator on **gender-equitable access to and use of low-emission energy services**.

In contrast, the proposed focus of indicative core paradigm-shift indicators for mitigation on overall GHG emissions reductions and their cost-effectiveness is too narrow (Table 2 and Annex IV) is too narrow; a focus on costs of GHG reductions favors economies of scale and is thus biased in favor of large-scale mitigation projects and could exclude smaller-scale mitigation projects, such as distributive off-grid renewable energy projects from which communities and women (as consumers, care-givers and entrepreneurs) specifically benefit, but for which individual transactions costs are higher. Likewise the volume of direct mitigation finance leveraged by the Fund is not an indicator for a paradigm shift in GCF action as financing is a means to the end, but not indicative of how much progress toward this end – namely low-emission, gender-equitable sustainable development – has been made.

- Reporting on the gender equality contribution of Fund interventions must be **mandatory on the project and programme result levels for both adaptation and mitigation**; it cannot be regarded as a “reporting option” under a proposed minimum RMF requirement for mitigation interventions to allow project proponents or implementing and executing entities to report on minimum one co-benefit of their choosing (para. 25). The current proposal is insufficient. Gender equality outcomes and multiple co-benefits are central to creating country ownership and ensuring the long-term sustainability of mitigation and adaptation actions in developing countries.
- **Men and women as differentiated beneficiaries** (including by disaggregating the household level and looking also specifically at women-headed households) need to be at the center of **performance measurement indicators focusing on livelihoods, health, water and food security, transport, ecosystem benefits, and energy use and access** (see the lists of indicative mitigation and adaptation indicators in Annexes IV and V).
- In addition to **quantitative indicators** (those including **sex-disaggregated data** and disaggregating households), **process and policy focused qualitative indicators** are also relevant (f. ex looking at significant policy or regulatory changes or engagement of stakeholders, including women).

Investment Framework ([Document GCF/B.07/06](#))

The investment framework operationalizes the second tier of the Fund's initial allocation framework by adopting a theme/activity-based approach in line with decision B.05/05. Its investment guidelines propose as set of initial activity-specific criteria and subcriteria (Table 2) for project and programme funding decisions. The investment framework with its investment guidelines is thus closely linked to the Initial Proposal Approval Process (GCF/B.07/03) and the Initial Results Management Framework (GCF/B.07/04). However, while documents GCF/B.07/03 and GCF/B.07/04 make some effort to integrate gender considerations, the gender-sensitive approach is not reflected in the proposed initial investment guidelines. They should therefore be revised to address the following points:

- **Criteria should be weighed in the context of a sustainable development approach**, ensuring the balanced consideration of multiple benefits and a gender-sensitive approach in addition to climate related impacts and economic efficiency considerations.
- Given the GI's cross-cutting mandate for a gender-sensitive approach to all GCF funding, **an explicit sub-criteria on gender impact should be added to the criterion on impact/result potential** (Table 2 in Annex I). While Annex III at this stage only provides illustrative indicators, the absence of any proposed indicators for sustainable development co-benefits and the gender-sensitive approach under that criterion is glaring.
- Future joint work by the Investment Committee, the Secretariat, other stakeholders and the Private Sector Advisory Group must focus on the **integration of gender considerations in the definitions for the activity-specific sub-criteria and a set of activity-specific indicators** (Draft Decision Annex I, (c) (i)).
- The current proposed criterion on economic efficiency is too narrowly focusing on cost-effectiveness and co-financing amounts. Instead, the criterion should focus on a **broader understanding of effectiveness** which includes environmental and social benefits as well as contributions of projects and programmes to gender equality in addition to cost-effectiveness considerations.
- The criterion on **paradigm shift potential** (Table 2 in Annex II) should be improved to include a reference to the **gender-sensitive approach** in the sub-criteria ("*...and to sustainable development, including social, economic and environmental co-benefits and taking a gender-sensitive approach for a paradigm shift.*")
- The criterion on **needs of the beneficiary country** should reference the "*financing needs of the beneficiary country, in particular those to addressing its most climate-affected population groups....*" with sex-disaggregated income level data of those population groups as a sub-criteria (Table 2 in Annex II).
- The **country ownership and institutional capacity criterion** should assess the capacity to implement a funded project or programme by looking at all relevant policies, including gender policies, climate strategies, and institutions (including national women's machineries) as well as the existence of and experience with gender-sensitive multi-stakeholder engagements. As sub-criteria, coherence with existing policies needs to include gender policies as well as the capacity of implementing entities or executing entities to deliver gender equality benefits via a gender-sensitive approach.
- **Gender expertise must be represented in expert advice or additional structures required** to support the Investment Committee and the Secretariat in developing activity-specific decision criteria and in assessing investment proposals against those criteria in the future.

Structure of the Fund and the Secretariat ([Document GCF/B.07/07](#))

The Governing Instrument urges consideration of geographical and gender-balance in the staffing of the Secretariat and the composition of the GCF Board. The document focuses primarily on these largely procedural steps, which need to be reinforced by the integration of gender competencies in all GCF structures, including the Board's committees, panels and advisory groups and Secretariat divisions, as well as the Fund's independent accountability mechanisms in order to operationalize gender-sensitive policy mandates for example via accreditation and proposal approval decisions or results measurement, monitoring and evaluation. Some key actions include:

- Gender expertise needs to be anchored in the GCF Secretariat at minimum via a **high-ranking senior level gender advisor** or better through a **gender task force with a management lead comprising representatives from all initial divisions of the GCF Secretariat** as indication of top GCF management support; it is not enough to designate a lower level professional as a “gender focal point”(for example as a part-time focus).
- Gender expertise needs to be **integrated into the initial main divisions of the Secretariat** as approved in decision B.05/10 and thus considered a core criterion for ongoing and future staff hiring; gender expertise is particularly relevant for the **country programming** division (with respect to M&E, country operational dialogue, including readiness assessment, accreditation and safeguards); the **mitigation and adaptation windows division** (with specific sector core expertise on agriculture and water urban development , disaster risk, transport, RE and energy efficiency and forestry); the **Private Sector Facility division** (especially with respect to project finance and financial intermediation);and the **external affairs division**(with a focus on resource mobilization; media & public relations; relationships with partner and observer organizations; external communication)
- A **gender action plan** (to be decided at the 8th GCF Board meeting)with deliverables from the GCF Secretariat should include:
 - **Provision of regular training for GCF staff** on gender and climate change linkages
 - **Development of comprehensive gender guidelines and tool kits** to mainstream gender into results management/M& E and project and programme activity-cycles
 - **Gender-focused technical support and capacity building** for Implementing Entities (IEs), Executing Entities (EEs), Intermediaries and government partners, especially NDAs and focal points.
- The **GCF Board should commit to strengthen its understanding** of the gender and climate finance linkages by holding regular gender workshops and exchanges with gender technical experts. One practical **way to address the current gender imbalance in the Board and its committees and panels** could be to ensure that the co-chairs, or a member and his/her alternate are always male/female pair. A special responsibility would fall on those countries represented on the Board who are represented by both a principal and an alternate member (such as France, UK, Germany, the US, Japan and Australia).

Initial Modalities for the Operation of the Fund’s Mitigation and Adaptation Windows and the Private Sector Modality ([Document GCF/B.07/08](#)).

- The paper on initial modalities is an overview paper detailing how GCF resources would be channeled and tracked and how separate policy decisions on initial modalities interact to make the Fund operational. It is therefore important that the **gender decision from Bali (B.06/07) as well as the gender policy in its applicability to and interaction with other operational modalities is referenced** in this paper as important elements of the Fund’s operational framework (Draft Decision in Annex I and Annex II).
- Future modalities for a simplified approval processes for small-scale activities (in line with para.53 of the Governing Instrument) are still to be developed (para. 66). The Board should consider establishing a **GCF Small Grants Facility** as a direct access modality for non-state and sub-national actors, particularly from civil society groups and communities that would for example allow women’s groups to execute small-scale projects themselves up to a financial scale still to be defined. Alternatively, the development of a country-based small grants programme as a recommended component of programmatic financing approaches to be implemented by intermediaries could be considered.