

THE MISSING LINK: Bringing Gender Equality to Adaptation Financing

Part II: A Look at the Least Developed Countries Fund (LDCF)

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Supporting the adaptation needs of developing countries is not just a matter of necessity, but also of global fairness and respect for human rights, including women's rights.

Introduction

Climate change has already severe impacts especially in the poorest countries and for the most vulnerable people and groups, among them disproportionately many women. Adapting to these impacts will be very costly—new studies have estimated costs in the order of tens of billions of US dollars a year—but unavoidable. Supporting the adaptation needs of developing countries with sufficient funds is not just a matter of necessity, but also of global fairness and respect for human rights, including women's rights. Currently none of the multilateral adaptation finance mechanisms systematically considers gender equality in its operations or project funding.

This brief provides an analysis of the status of gender considerations at the Least Developed Countries Fund (LDCF), an adaptation financing instrument under the United Framework Convention on Climate Change (UNFCCC). It gives some recommendations for incorporating gender equality in LDCF funded projects in order to improve their adaptation outcomes. A second separate brief looks at how gender-aware funding decisions and projects at the Special Climate Change Fund (SCCF) are.

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Several new multilateral climate funds for adaptation have been set up in the past two years to assist developing countries with efforts to foster climate-resilient development and improve ecosystem resilience. A lot of attention has been focused on the new Adaptation Fund (AF) under the UN Framework Convention on Climate Change (UNFCCC) and the Strategic Climate Fund (SCF) with a Pilot Program on Climate Resilience (PPCR) at the World Bank; both funds are expected to generate hundreds of millions of US dollars in a relatively short period.

However, these new instruments have distracted attention—and funding—from the two oldest existing adaptation funds, the Least Developed Countries Fund (LDCF) and the Special Climate Change Fund (SCCF). While their future role and weight in a new climate finance architecture is uncertain, they are expected to remain in operation for the foreseeable future. Thus, their history of interaction with developing countries up to now—including on gender issues—can provide some important lessons for deciding on the best way to fund climate resilience in developing countries in the future.

Origins, Mandate and Scope of the LDCF

The Least Developed Countries Fund (LDCF) was established in 2001 by a decision of the 7th Conference of Parties (COP 7) of the United Framework Convention on Climate Change (UNFCCC) at the same time as the Special Climate Change Fund (SCCF). The LDCF is tasked to address the special needs and vulnerabilities of 48 Least Developed Countries (LDCs)¹ with respect to adverse climate change impacts by supporting the preparation and implementation of National Adaptation Programmes of Action (NAPAs). These spell out the urgent and immediate needs of LDCs, identified by the countries themselves, to adapt to climate change. The LDCF is to fund only additional costs for immediate adaptation needs over a development (“business-as-usual”) baseline. LDCF grants, as in with the SCCF, are supposed to leverage significant additional resources from other multilateral and bilateral sources, including the recipient countries themselves.

BOX 1: LDCF GOVERNANCE

Several agencies and bodies are involved with the governance of the LDCF. Established under the United Nations Framework Convention on Climate Change (UNFCCC), the fund is managed by the Global Environment Facility (GEF) with the World Bank acting as trustee. As administrator of the LDCF, the GEF has to respond to guidance and request of the Conference of Parties (COP) of the UNFCCC. Spending decisions under the LDCF are made by the GEF Council (since August 2006 meeting twice a year as LDCF/SCCF Council) and the GEF Chief Executive Officer (CEO) at each step of a streamlined GEF Project Cycle. It consists of a sequence of actions that includes the submission of a project identification form (PIF), followed by a project preparation grant (PPG), then a medium-sized (MSP) or full-sized project (FSP) proposal. Each of these stages is either approved by the GEF CEO and/or the GEF Council. The GEF Council is the governing body of the GEF and has 32 members (14 from donor, 18 from recipient constituencies).

LDCs that are a party to the UNFCCC are eligible for LDCF funding, but have no direct access to these monies. Instead they need to request support from one of ten multilateral implementing and executing agencies of the GEF. While the NAPAs can be completed only by involving one of the three GEF implementing agencies (the World Bank, UNEP or UNDP), NAPA projects can be implemented by all ten GEF agencies at the request of a country.

*The GEF has 3 implementing agencies, namely the United Nations Development Programme (UNDP), the United Nations Environment Programme (UNEP) and the World Bank. Additionally, seven executing agencies, namely the African Development Bank (AfDB), the Asian Development Bank (ADB), the European Bank for Reconstruction and Development (EBRD), the Inter-American Development Bank (IADB), the International Fund for Agricultural Development (IFAD), the United Nations Food and Agricultural Organization (FAO), and the United Nations Industrial Development Organization (UNIDO), contribute to the implementation of GEF projects.

The LDCF receives voluntary contributions of currently 19 Annex 1 (industrialized) countries², which have pledged USD 180.8 million to the fund as of September 30, 2009. However, so far the LDCF has only received USD 155.4 million in payment. A large proportion, namely USD 108.3 million, has already been spent for project preparations and projects.³

The actual funding amounts contrast poorly with the UNFCCC's own estimate of at least USD 800 million (and possibly up to USD 1.5 billion) needed to fund the more than 400 adaptation projects already identified under the NAPAs as urgent and immediate. The GEF advocates for the replenishment of the LDCF of at least USD 500 million over the next four years.⁴ Some outside experts go even higher, demanding that Annex 1 countries allocate USD 2 billion over five years for the same purpose.⁵

The current size and unpredictability of available funding constrains the LDCF to offering relatively small scale funding for project or sector focused priorities, not programmatic or transformative approaches that would feed into wider development coherence objectives. LDCF money is disbursed as grants, but fully counted toward Official Development Assistance (ODA) figures. This contradicts the UNFCCC call for Annex 1 (donor) countries to provide new and additional resources for adaptation.

Under the currently available funding, each eligible LDC would receive just USD 3.7 million for the implementation of its NAPA. This makes co-financing from other sources, including multilateral development assistance, imperative. As of October 1, 2009, the USD 122.3 million committed for NAPA priority project implementation solicited an additional USD 283.1 million in co-financing.⁶

So far, 43 country-owned NAPAs have been completed with the financial support of the LDCF (which spent on average USD 200,000.00 per NAPA); six more are in the final stages of preparation. Additionally, some 34 countries have submitted NAPA implementation projects to the GEF. Yet, seven years after the fund's establishment, only nine LDCF implementation projects have started, with another 22 in the pipeline awaiting final review or approval within the next 6 months.⁷

The complicated and slow approval process, despite attempts at streamlining still lengthy GEF project cycle, as well as the difficulty in accessing the funds, high transactions costs and fees, and the gross underfunding of the LDCF are the main complaints of many recipient countries with the LDCF. Developing countries also criticize the complexities of differentiating between "additional costs" and regular development needs and chafe at the expectation that they contribute themselves to LDCF projects. A recent external LDCF evaluation, echoing many of the LDCs' concerns, found the funds' problems to be structural, urging an expansive restructuring of the fund.⁸

The Gender Relevance of the LDCF's Funding Mandate

The adverse effects of climate change, including extreme weather variability with increased natural disasters and droughts, are already felt acutely in many parts of the developing world and nowhere more so than in the poorest countries, as these countries lack the resources and capacities to address urgent adaptation challenges head-on. They threaten to negate or even reverse many development gains of the last two decades. The poorest and most disenfranchised population groups in LDCs (many of them Sub-Sahara African and Small Island Developing States) in turn are those the most vulnerable to climate change impacts, many of them women.

Climate change impacts are not gender-neutral, as a growing body of scientific studies underscores. As the majority of the world's poor and as primary caretakers for families, women are affected differently, and often disproportionately worse than men by climate change. Their traditional roles in the provision of food, water, care and health services for their families and local communities forces them to rely heavily on the use and management of natural resources for their survival and livelihood. At the same time, women have often untapped existing knowledge of coping strategies already utilized at the grassroots level. Many of these employ cost-effective, low-technology strategies which could be beneficial if included in national and international adaptation response strategies and plans.

With the LDCF being narrowly focused on financial assistance for the completion and implementation of country-owned NAPAs, the action plans in which LDCs prioritize the most urgent and immediate projects to address vulnerabilities to climate change, it is mainly through

the NAPAs, their development and implementation that the LDCF relates most directly to poor women and men's livelihoods.

Status Report on Gender Considerations in the LDCF

UNFCCC COP Decision 28/CP.7 identifies gender equality as a guiding principle for NAPAs. In fact, the guidelines for NAPA preparation which were developed by a Least Developed Countries Expert Group (LEG) established by the UNFCCC, spell out the need for participatory processes with the involvement of a wide array of stakeholders, including men and women at the community level, in formulating a country's NAPA. While these guidelines are not meant to be prescriptive and give countries flexibility to address individual country circumstances, they nevertheless stress that "Women are often the main repositories of vital local and traditional knowledge, and they need to be recognized as key stakeholders in the consultations and in decision-making."⁹

Unfortunately, expert reviews and analysis of most of the 43 NAPA reports financed through the LDCF and submitted to the UNFCCC to date¹⁰ show that the majority fails to sufficiently incorporate and acknowledge either gender differentiated vulnerabilities to climate change or the specific contribution of women to adaptation efforts.¹¹ This is despite the fact that almost all of the submitted NAPAs identify for their country significant climate change impacts on food security, water resources, health, early warning and disaster relief, or sanitation—all areas where men and women are affected differently, as the experience from the development sector shows. In fact, of over 400 priority projects identified in completed NAPAs, more than 100 projects related to food security, an area with clear gender implications. Management of water resources, another area where gender differences are apparent, was the focus of another 57 priority projects.

Where NAPAs reference gender equality explicitly, it is more often than not in general, broad terms. And few NAPAs address women's adaptation needs and contributions other than in terms of their vulnerability. They focus solely on women as victims of climate change, not as powerful actors with the capacity to initiate and contribute to change through participation in strategic adaptation project planning, decision-making and implementation.

There are positive examples of NAPAs that successfully integrate at least some gender concerns and address gender equality as imperative for climate-resilient development (see Box 2)¹². However, mainstreaming gender into NAPAs remains the exception rather than the rule, and none of the NAPAs so far could be cited as best practice in showcasing a comprehensive and systematic gender mainstreaming effort.

BOX 2: SOME POSITIVE EXAMPLES OF EFFORTS TO ENGENDER NAPAS

The Malawi NAPA, submitted to the UNFCCC in March 2006, is the only NAPA to identify gender as a sector of action of equal importance with agriculture or water management, not just as a cross-cutting issue addressed to varying degree within other sectors. It lists several interventions that target women in highly vulnerable situations, including empowering women through access to microfinance; diversifying their earning potential; ensuring their easier access to water and energy sources by drilling wells and planting trees and through a focus on rural electrification programs.

Several countries—among them Bangladesh, Burkina Faso, Mali, Samoa, Senegal and Tanzania—followed UNFCCC guidelines and consulted with women's groups, including indigenous women, in preparing their NAPAs. Women are among the beneficiaries (although not the sole beneficiary group) of projects prioritized in the NAPAs of Bangladesh, Eritrea, Mauritania, Niger and Senegal. And the inclusion of women or of a gendered or gender-equality approach was used as selection criteria for priority strategic actions in the NAPAs of Burundi, Guinea-Bissau, Lesotho, Niger, Samoa, Solomon Islands and Zambia.

To date, most of the NAPAs requested under the UNFCCC have already been written (43 of 48 possible). Nevertheless, in understanding NAPAs as flexible planning tool and part of an ongoing process (rather than an end in themselves), their very existence represents a tremendous opportunity to advance gender equality in LDCF adaptation financing. Fittingly, the LEG advises least developed countries to consider regularly updating and re-structuring NAPAs, for example on a biannual basis, in order to better align them with national budget processes.¹³ Gender concerns could thus be directly injected, refined or improved upon in any future update of a country's NAPA.

With few actual LDCF funded NAPA implementation projects of the ground, it is also still possible to refine and strengthen existing NAPAs in the national contexts (f.ex. where a reference to “most vulnerable” groups as target of an action is mentioned) by introducing gender-awareness and gender criteria in a NAPA *post ante* at the project level. Likewise, least developed countries in preparing projects for implementation approval by the LDCF should work with the ten GEF implementing agencies in mainstreaming gender into those projects. Most of them—although not the GEF itself (see Box 3)—have an institutional approach to gender equality in the form of formalized gender policies or gender plans of action.¹⁴

This could be done by developing gender-sensitive indicators for a project to allow the tracking of progress or through the inclusion of quantitative and qualitative targets—measurable and verifiable of course—which address gender considerations and women's needs and capabilities in the specific project. Likewise, the project budget should be developed gender-responsive, and expenditures tracked and monitored accordingly.

BOX 3: THE GEF AND GENDER MAINSTREAMING

The GEF does not have a specific gender policy or strategy except for a Public Involvement Policy which includes gender provisions. This is despite the fact that almost all of the GEF Agencies, as well as the Conventions for which the GEF acts as financial mechanisms—with the notable exception of the UNFCCC—have a gender equality mandate. Currently, the GEF relies on its ten implementing agencies to mainstream gender into its portfolio, leading to uneven results. A 2008 internal analysis of GEF projects across all of its six focal areas, the first ever GEF report on the status of its gender mainstreaming efforts, found that for climate change only 11 percent of the examined GEF projects made an attempt to incorporate gender considerations (other focal areas, for example biodiversity, fared much better).¹

Some initial steps were taken to overcome these shortcomings. A gender focal point from within the Secretariat's circle of environmental experts was recently appointed. And there are suggestions that the GEF might be working towards adapting a gender strategy or guidance in the near future.

SOURCE: GEF (2008). Mainstreaming at the GEF. October, Washington, DC.

That the level of gender-awareness in LDCF funded adaptation measures is lacking, is revealed by a review of several LDCF implementation project documents. Even projects in countries which had elaborated a gender-aware NAPA, gender issues and women's roles as participants, beneficiaries and actors in adaptation efforts were addressed only sporadic—or not at all. A more thorough research and analysis is needed, and should be taken up as task by the LDCF team at the GEF. Looking at the project documents for more than a third of the currently 29 full-sized implementation projects, only the ones for the projects in Bangladesh (see Box 4), Bhutan and Malawi make any mention of gender or women.¹⁵

While many of the documents publicly available correspond to early stages of the GEF project cycle (the project identification form, PIF, or the project preparation grant, PPF), the absence of any consideration of gender issues and women as a group in these documents—be it as part of the project analysis, as indicator for the success of the project, as target group for priority actions under the project, as expertise for the job description of project leaders and specialists—does not bode well for the project implementation. It is at these earlier stages of the LDCF project cycle that a systematic inclusion of gender equality in planning documents is needed.

The task falls equally to experts and officials from the recipient country, the GEF implementing agency, the LDCF staff at the staff, and hired project consultants).

In their quest to mainstream gender into LDCF projects, least developed countries should also be able to rely on expertise and recommendations from the LEG, whose gender awareness could likewise be improved. Of the twelve experts (nine from least developed countries) making up the LEG, only one is currently a woman. And a newly UNFCCC published *Least Developed Countries Step-by-Step Guide to Implementing National Adaptation Plans of Action*, which the LEP developed in collaboration with the GEF and its agencies, mentions gender mainstreaming just once as adaptation strategy to reduce vulnerability, but not as cross-cutting intervention in other nine identified adaptation sectors such as food security or water resources management.¹⁶

BOX 4: A GENDER-AWARE LDCF PROJECT FROM BANGLADESH

The four-year *Community-Based Adaptation to Climate Change through Coastal Afforestation* project in Bangladesh, which began in Spring 2009, is funded with USD 3.5 million by the LDCF and USD 7.1 million in co-financing from the Government of Bangladesh and UNDP. It plans to use the LDCF resources “to empower women through engagement in the planning and design of activities to build long-term adaptive capacity, such as the development of household- and community-level risk reduction plans, identifying climate-resilient livelihoods, and improving information flows regarding extreme events”¹

The project plan lists specific indicators for gender, including the number of women farmers to be trained in suitable agricultural cultivation technologies in coastal areas and the number of women to be reached in community-based training programs on climate risk reduction. Significantly, proven gender expertise is also mentioned as a criterion for selecting and hiring staff involved in the project implementation (although not at the management and project leader level), as well as in selecting UNDP Bangladesh as the project’s implementing agency.

SOURCE: Project appraisal document (for CEO endorsement), p. 10; can be downloaded from: <http://www.gefonline.org/projectDetailsSQL.cfm?projID=3287>.

Providing the Missing Gender Link at the LDCF—Some Important Steps Forward

Several steps should be taken to improve the consideration of gender equality in the preparation and implementation of LDCF funded adaptation projects:

- **Prepare and institute a strong gender-mainstreaming policy and/or a Gender Plan of Action at the GEF:** A formalized gender policy at the GEF would give GEF staff clear directives, incentives and specific mandates to systematically incorporate social and gender analysis in its approval processes.
- **Develop a coordinated joint gender approach to adaptation among GEF and its partner agencies:** The GEF should coordinate and consult with its partner agencies to develop a common understanding and practice on how to incorporate gender awareness in LDCF funded adaptation projects and how to monitor them for concrete gender outcomes. For example, they should develop minimum gender standards or a gender safeguard policy, applicable to all LDCF funded projects.
- **Use gender indicators to track progress toward gender equality in LDCF project implementation:** Developing countries should work with GEF implementing agencies in order to mainstream gender into projects that are being prepared for implementation approval by the LDCF. Countries should develop gender-sensitive indicators for projects to allow the tracking of progress, or include measurable and verifiable

quantitative and qualitative targets that address gender considerations and women's needs and capabilities.

- **Generate and disseminate knowledge products on gender and adaptation:** The Climate Change and LDCF teams in the GEF Secretariat should generate and disseminate knowledge products that identify how LDCF adaptation projects can address gender equality issues and support women as agents of adaptation. They should compile existing research, identify research gaps relevant to their work, and request and fund additional research.
- **Provide gender training to staff:** Joint workshops involving relevant staff of all GEF agencies should be held regularly focusing on the correlation between gender equality and improved adaptation outcomes. By utilizing periodic gender audits for implementation projects, the GEF experts should showcase “best practices” and formulate recommendations on LDCF project implementation to be shared with donor and recipient countries and implementing agencies.
- **Refine and strengthen existing NAPAs:** LDCF recipient countries should include gender considerations in all stages of NAPA preparation and updating, as well as in the design of adaptation projects. They should ensure and foster women's direct **Use existing gender tools early and systematically:** Adaptation projects under the LDCF should take the differentiated impacts on and contributions of men and women into account in project development and implementation by utilizing tools such as gender indicators, social and gender analysis, gender-differentiated data-sets, gender documented in the development context (f.ex. gender-responsive budgeting) and **Include gender equality in all LDCF funding decisions:** LDCF donor as well as recipient countries should ask the GEF and the LDCF/SCCF council to include gender equality in all their funding decisions. Donor countries should provide tied or earmarked additional resources for gender equality projects under the fund; they should also significantly increase the amount and reliability of their financial contributions to multilateral adaptation funding mechanisms, including to the LDCF.
- **Allow funding access for non-governmental and community-based organizations:** The LDCF/SCCF Council should consider new approaches to financing projects under the LDCF, including opening a window to support the implementation of climate change adaptation projects by non-governmental and community-based organizations, giving special consideration to women's and gender groups. For such a funding window, the project approval process should be significantly shortened and the project documentation requirements reduced. Project preparation funding should provide sufficient resources for community consultations and targeted outreach to marginalized groups, especially women.
- **Adapt gender equality language for the Convention and make gender equality a guiding principle for national actions on climate change:** The UNFCCC COP should adapt gender equality language for the Convention and request its Secretariat to initiate a work program on gender and climate change, particularly on adaptation, financing and technology transfer. The COP should also request that expert groups involved in preparing NAPA guidelines and national communications incorporate gender considerations and women's roles in adaptation, and develop training workshops and capacity-building activities related to the guidelines.
- **Focus research and lobby efforts on adaptation on the benefits of gender equality for building climate resilience:** Civil society organizations and gender advocates in multilateral and government institutions and agencies can contribute to fill the perception and knowledge gap on utility of considering gender in adaptation projects by conducting relevant research, especially by documenting best practices of successful gender-aware projects in community settings. They can also help by attending stakeholder consultation meetings, and by lobbying their national governments to ensure that gender equality is an important criterion of project selection and approval.

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also www.climatefundsupdate.org

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ENDNOTES:

¹ These are LDCs that are parties to the UNFCCC; as only recognized LDC, Somalia is not a party to the UNFCCC.

² Those are: Australia, Austria, Canada, Denmark, Finland, France, Germany, Ireland, Italy, Japan, Luxembourg, Netherlands, New Zealand, Norway, Portugal, Spain, Sweden, Switzerland and United Kingdom.

³ Global Environment Facility, GEF (2009a), Status Report on the Special Climate Change Fund and the Least Developed Countries Fund (Prepared by the World Bank as Trustee); GEF/LDCF.SCCF.7/Inf.2, October 14, 2009; document for the LDCF/SCCF Council Meeting, November 12, 2009, Washington, D.C.

⁴ GEF (2009b). Draft Adaptation to the Climate Change Programming Strategy; GEF/LDCF?SCCF.6/Inf.4, June 2, 2009; document prepared for the LDCF/SCCF Council Meeting, June 24, 2009.

⁵ IIED briefing (2009). "National adaptation funding: ways forward for the poorest countries". April. Available at: <http://www.iied.org/pubs/pdfs/17054IIED.pdf>.

⁶ GEF (2009c), Progress Report on the Least Developed Countries Fund (LDCF) and the Special Climate Change Fund (SCCF), GEF/LDCF.SCCF.7/Inf.3, October 15, 2009; document for LDCF/SCCF Council Meeting, November 12, 2009 in Washington, DC.

⁷ Ibid.

⁸ GEF. (2009d). Joint External Evaluation: Operation of the Least Developed Countries Fund for Adaptation to Climate Change. Prepared by DANIDA Evaluation Department and the GEF Evaluation Office.

GEF/LDCF.SCCF.7/Inf.4; document for LDCF/SCCF Council Meeting, November 12, 2009 in Washington, DC. Available at:

http://www.thegef.org/uploadedfiles/Documents/LDCFSCCF_Council_Documents/LDCFSCCF7_November_2009/GEF-LDCF7-Inf4-101309.pdf.

⁹ United Nations Framework Convention on Climate Change, UNFCCC (2002). "Annotated Guidelines for the Preparation of National Adaptation Programmes of Action". Least Developed Countries Expert Group. July, page 3; available at: http://unfccc.int/files/cooperation_and_support/ldc/application/pdf/annguide.pdf.

¹⁰ A listing of NAPAs received by the UNFCCC Secretariat is available at

http://unfccc.int/cooperation_support/least_developed_countries_portal/submitted_napas/items/4585.php.

¹¹ United Nations Population Fund (UNFPA) and WEDO. (2009). Climate Change Connections. A Resource Kit on Climate, Populations and Gender; available at <http://www.unfpa.org/public/site/global/lang/en/pid/4028> ; see also Annex V. "Review of the NAPAs", available at http://www.um.dk/NR/rdonlyres/6C0CB5B9-4EF9-4F3B-9C75-E9F714442779/0/Annex_V_Review_NAPAs.pdf (accessed on November 7, 2009); NOTE: Annex V was not included in the external evaluation document of the LDCF -- see in: GEF (2009d -- submitted by the GEF Secretariat for GEF Council notice and approval during the 7th LDCF/SCCF Meeting in November 2009 in Washington.

¹² UNFPA and WEDO (2009)..

¹³ LDC Expert Group (2009). The Least Developed Countries National Adaptation Programmes of Action: Overview of preparation, design of Implementation strategies and submission of revised project lists and profiles. UNFCCC Secretariat.

¹⁴ Of the 10 GEF implementing agencies, only UNIDO does not yet have a specific policy or strategy related to gender. The nine other agencies address gender in varying degrees and with varying commitment levels via Gender Plans of Action (AfDB, EBRD, IFAD, UNEP, FAO) or Gender Policies or Gender Equality Strategies (ADB, IADB, World Bank, UNDP). For a short description of these gender plans and policies, see: GEF (2008).

Mainstreaming Gender at the GEF. October; available at

<http://www.gefweb.org/uploadedFiles/Publications/mainstreaming-gender-at-the-GEF.pdf>.

¹⁵ For this brief overview, the documents for full-size LDCF projects which are available via the GEF online database (<http://www.gefonline.org/projectListSQL.cfm>; accessed November 8, 2009) were reviewed for the following countries : Bangladesh, Benin, Bhutan, Congo DR, Eritrea, Malawi, both Mali projects, Niger, Sudan, and Vanuatu.

¹⁶ UNFCCC (2009). "Least Developed Countries Step-by-Step Guide to Implementing National Adaptation Programmes of Action". Least Developed Countries Expert Group in collaboration with GEF and its Agencies. September. Available at: http://unfccc.int/resource/docs/publications/ldc_napa2009.pdf.