We welcome the fact that Enhanced Direct Access (EDA) is moving forward and would appreciate an update on the RFP.

We are excited to see a small grants facility that aims to get funding directly to the community level and involve communities in project design and implementation. However, we are not 100% clear as to why the grant facility pre-defined 3 types of grants. It should have been possible to keep it open to provide grants for issues identified via the climate vulnerabilities and capacities assessments. We worry that this could potentially make it difficult to respond to some of the needs identified by communities.

The proposal could do more to address gender issues. Some suggestions include:
- Ensuring trainings and technical support provided to CBOs include opportunities for both women and men to participate
- Prioritizing capacity building to carry out gender sensitive climate change analysis
- Providing details about gender issues in CBO governance

While it is good that they recognize limits on the capacity of CBOs to manage significant funds, relying on service organizations to support the CBOs may also have some negative consequences.

With regard to the proposal approval process, it is not clear whether or not civil society will be involved in the proposal review/approval process in any way. This is something we are looking for in EDA.

We also have several concerns about the ITAP’s assessment.
- While we agree with them that some adjustments to assessment criteria may be necessary for EDA proposals, in this case as well as others, we find the ITAP’s assessment to be biased against smaller national entities. The ITAP frequently requests additional details of smaller scale, direct access projects that it does not request of big international entities seeking much larger sums of money where crucial details are missing.
- The ITAP’s concern as to whether EDA funded sub-projects will be economically viable could also be seen as a double standard. In programmatic funding proposals offered by international entities, such as the EBRD SEFF and the IDB SEF proposals, the ITAP does not take issue with not being able to know the financial viability of individual subprojects (which are likewise unknown at the time that the funding proposal is put forward).
- We find the condition that the AE make all the details about the projects to be funded via the grant facility available prior to the second disbursement of funds to be an onerous condition that goes against the spirit of EDA.
- We strongly disagree with the ITAP’s suggestion to cut the investments in CBO governance. This is a critical part of building local capacity to support communities in the long term and a good use of GCF resources.
- Similarly we aren’t sure it is wise to limit the support costs for component 2 at this stage. This is a pilot project for the GCF to gain experience and learn from – and this should be one of the issues or lessons to reflect upon at the end of the pilot.