

CSO Comments on the Draft Gender and Social Inclusion (GESI) Policy and Action Plan

We appreciate the progress the GCF is making on developing a best-practice gender mainstreaming and social inclusion approach for the Fund. We welcome that the new draft released for Board consideration and adoption at B.19 has some positive changes to strengthen the updated GESI policy and action plan with a view to clarifying responsibilities and improving accountability for gender equality, women's empowerment and social inclusion results for the GCF and all its implementation partners. In this regard we are pleased to see concrete CSO recommendations from our comprehensive joint submission¹ incorporated in the updated draft, such as firmly anchoring a comprehensive human-rights based approach grounded in international agreements and commitments, addressing the intersectionality of gender equality and women's empowerment to ensure more inclusive societies as well as making at the individual project/program level both a GESI analysis and a fully costed GESI action plan mandatory.

As representatives of civil societies, who have engaged in the efforts of the Fund to develop a gender policy and action plan and incorporate gender-responsiveness into GCF operational policies from the beginning of the Fund's design process, we urge the Board to adopt this draft during B.19; while continuing to make progress on gender equality, women's empowerment and social inclusion efforts in the Fund's policies and the implementation of funded projects and programs. We would also like to reiterate our conviction that a strong GESI policy, a state-of-the-art Indigenous Peoples policy and a comprehensive Environmental and Social Management System (ESMS) with a best-practice Environmental and Social Policy (ESP) are mutually reinforcing and should be adopted together at B.19.

Nevertheless, we believe that the current GESI policy draft could still be improved with some selected modifications, and we appreciate the opportunity to provide our suggestions and some general comments in this regard.

General Comments:

Approve the whole GESI policy package: As we had previously stated, it is crucial that the Board does not only approve the GESI policy (in Annex II) and action plan (in Annex III), but also adopts the performance measurement log frame (in Annex IV). The omission of the log frame in the Gender Policy and Gender Action Plan 2015-2017 was one of the weaknesses of the previous gender policy. Thus, Annex IV must be approved as a core part of the GESI policy package this time around. The log frame which includes the indicators, responsibilities, time-frames and financial commitments holds the GCF accountable for GESI 2018-2020 implementation.

Broadening of GESI policy mandate not accompanied by a commitment to more GCF staff/financial resources: We are encouraged by some language improvements in the new GESI draft policy and action plan that make it much clearer that -- despite the widening of the policy mandate to include broader social inclusion taking into account the intersectionality of gender with other sociocultural factors (such as race, ethnicity, status, age, class or religion) -- a commitment to gender equality and women's empowerment remains at the core of the revised draft GESI policy and action plan. However, we remain concerned that this broadened mandate is not reflected in a commitment to more staff and financial resources devoted within the Secretariat to GESI implementation. In the policy (under Section 7.1.) and the action plan (under Section 1.2.) a clear reference should include establishing a GESI team within the Secretariat (not just a gender focal point). This would entail increasing the number of gender and social inclusion experts and their placement in core Secretariat divisions, not just in the ESS unit under the CPU, but also PMU,

¹ Available at: https://us.boell.org/sites/default/files/uploads/2012/10/gcf_gesi_draft_policy_-_joint_cso_submission_final_version_0.pdf

DMA and PSF.² We also urge the establishment of a gender advisory group of experts (Section 7.1 (I)), currently only held out as an option. . Sufficient funding should be made available for the establishment of the GESI team within the Secretariat and the gender advisory group.

On Annex II: GESI Policy

Role and responsibilities of the GCF (Secretariat and Board): The draft policy no longer contains a reference (included in an earlier draft) to the role of the Board, including by improving the gender-balance of its own composition in line with the Governing Instrument mandate. Therefore, we suggest that the “Board responsibilities” be incorporated in the GESI policy (in Section VII: Policy Requirement). Implementing the GESI policy is the responsibility of all members of the GCF family, and we appreciate that the role of NDAs/focal point and the recognition of country ownership in the draft policy was strengthened. The focus of the policy on implementation at the project/programme-level is understandable, but the responsibility for following the letter of the GESI policy cannot be transferred primarily to the AEs, but must remain solidly with the Secretariat and Board. Therefore, we would also like to see under Section 7.1 on “GCF responsibilities” a clear policy statement, as is articulated for example in the Gender Policy of the Adaptation Fund, that the Secretariat will not advance, and the Board will not approve any project proposals without adequate GESI assessment and a fully costed project/program-level gender action plan.

Compliance of GCF partners with human-rights based approach of GESI policy: We welcome the policy’s commitment to a strong human-rights based approach. However, we would like to see reference to a GCF compliance mechanism to ensure adherence by AEs and NDAs/focal points with the international human rights principles in their application of the GESI policy restored in Section 7.2. In this respect, it would be important to clarify that para.37 of the policy does not undermine such compliance by AEs, for example in the case of MDBs or other implementation partners, which do not anchor a human-rights based approach in their own operational, safeguards or gender policies. The policy should make it clear that there will be no acceptance of a false “equivalency approach.” by making it clear that GESI.

Coherence of context: The last sentence for the paragraph on Intersectionality (5 (I) under Section II: Definitions) should be equivalent to the sentence in paragraph 12 (under Section IV: Objectives). For coherence, we would like to suggest that an ambiguous reference to “inclusion and exclusion” in the last sentence of 5 (I) be deleted.

On Annex III: GESI Action Plan

Resource allocation, accessibility and budgeting: We appreciate the inclusion of Priority Area 3 in the GESI action plan, although a corresponding section in the GESI policy is missing (in a weakening against the current gender policy). We think this section could be further strengthened by indicating: a) that the GCF will not fund projects and programs without sufficiently articulated gender equality, women’s empowerment and social inclusion considerations, and b) more clearly articulating that GCF strategies for targeted gender-responsive climate financing to support grassroots activities should include regular financial set-asides allowing for simplified access procedures, for example, under small grants approaches (either through EDA, or special request for proposals from marginalized groups and communities).

² Note that the Board approved Secretariat staffing plan (GCF/B.18/10), foreseeing a staff expansion to 250 people by end of 2018, only expects four staff positions for environmental and social safeguards (ESS) and gender combined. This is not enough to address the broadened GESI policy mandate.