

Joint CSO Submission on Issues to be Addressed and Improved in a Comprehensive Review of the Participation of Observers in the Activities of the GCF Board

I. Background

At its twelfth meeting, the Board initiated the process of developing terms of reference for the review of the GCF guidelines relating to observer participation, accreditation of observer organizations and participation of active observers mandated in decision B.01-13/03. The guidelines called for a comprehensive review of observer participation, including the selection process of active observers, involving a wide range of stakeholders to be undertaken after a trial period of two years with a view to identifying gaps and improvements related to the guidelines.

In decision B.12/24, para. (a), the Board requested “the Co-Chairs to consult with fellow Board members and alternate Board members, active observers and accredited observer organizations in relation to the comprehensive review of the participation of observers in the activities of the Board.” In accordance with decision B.12/24, observer organizations were invited to submit to the Secretariat views on the terms of reference for the review. A group of civil society organizations submitted consolidated views, which informed the terms of reference for the review of observer participation as adopted by the GCF Board with decision B.BM-2016/11. The Secretariat in its call for submissions invited in particular “active observers and accredited observer organizations”, but also “other interested entities” to address, inter alia, the points listed below.

This **joint submission, by a group of civil society organizations active in GCF proceedings and coordinated by the CSO active observers**¹, responds to this request for inputs.

II. Observer participation in GCF processes

(a) Policy and practice of formal observer engagement and representation as well as comparable approaches undertaken by peer institutions and international best practice

With the GCF as a learning institution committed to international excellence and innovation, in order to improve the policy and practice of observer participation in its own processes, it must comprehensively consider:

- How policy and practice of observer participation at the GCF align with international best practice and standards, as well policies and practices at other multilateral funds, such as Global Fund to Fight AIDS, Tuberculosis and Malaria (Global Fund), the Global Partnership for Education (GPE), and the Global Agriculture and Food Security Program (GAFSP). It should draw on internationally recognized fundamental principles on rights to information, public participation and justice in all environmental

¹ For a list of GCF observer organizations and other CSO groups interested in the GCF, which contributed to and endorsed this submission, see the list annexed to this submission. For the purpose of this submission, the GCF CSO active observers, who coordinated this submission, are the contact points.

matters as expressed in Rio Principle 10.² One clear example of a GCF recognizable shortcomings and deviations from best practice is the lack of a dedicated active observer seat for Indigenous Peoples in the GCF. International standards and GCF complementarity and coherence with other multilateral mechanisms and processes would suggest that the GCF establish such a dedicated seat for Indigenous Peoples in line with the Global Environment Facility (GEF), the World Bank's Forest Carbon Partnership Facility (FCPF), the Climate Investment Funds (CIFs), and the UN REDD+ Collaborative Initiative, among others

- How policy and practice of formal stakeholder consultation – at the Board level and in-country – compare with peer institutions and international best practice, such as the Global Fund, GPE or GAFSP.

Survey Recommendation: The Secretariat should consider polling the Board and advisers to generate a broader range of ideas on how observer participation could be strengthened to help advance Board decision-making. One of the primary benefits of meaningful and effective observer participation is to enhance Board decision-making through exposure to a broader range of stakeholder input. Accordingly, we believe that the review of observer participation would benefit from a structured outreach to Board members and alternates to generate ideas on how observer participation could be made more useful to the board. Towards this end, the Secretariat should consider polling the Board and advisers to generate a broader range of ideas on how observer participation could be strengthened to help advance Board decision-making.

In-Country Observer Participation: The GCF's Governing Instrument states that "The Fund will pursue a country-driven approach and promote and strengthen engagement at the country level through effective involvement of relevant institutions and stakeholders." Relevant stakeholders definitely include national and local Civil Society Organizations, especially those with constituencies from affected communities and sectors.

As the Board shifts its focus to consideration of specific funding proposals and accreditation applications, it is increasingly important that this principle is given full effect. Anecdotal experience, however, strongly suggests a serious deficit of in-country engagement with NDAs and accredited entities beyond select government ministries, and even more so engagement with local and national CSOs. The quality of CSO engagement in Board proceedings, and ultimately the quality of the decisions the Board takes on these issues will depend more on the information that comes to the Board through "effective involvement of relevant institutions and stakeholders" at the country level.

² Rio Principle 10, adopted in 1992 and confirmed in subsequent follow up processes states: "Environmental issues are best handled with participation of all concerned citizens, at the relevant level. At the national level, each individual shall have appropriate access to information concerning the environment that is held by public authorities, including information on hazardous materials and activities in their communities, and the opportunity to participate in decision-making processes. States shall facilitate and encourage public awareness and participation by making information widely available. Effective access to judicial and administrative proceedings, including redress and remedy, shall be provided."

<http://www.unep.org/documents.multilingual/default.asp?documentid=78&articleid=1163>.

Subsequent agreements like the Aarhus Convention (<http://ec.europa.eu/environment/aarhus/>) and the Almaty Guidelines (<http://www.unece.org/fileadmin/DAM/env/documents/2005/pp/ece/ece.mp.pp.2005.2.add.5.e.pdf>) reinforce those universally agreed Rio 10 principles in specific regional contexts.

NDAs were supposed to be the primary in-country unit of the GCF, and the real drivers behind the Fund. Unfortunately, we see accredited entities to be more prominent in setting the Fund's direction and dictating its financing than NDAs.

Indeed, much of the GCF's time and energy has been invested in accredited entities, not NDAs. Instead of loci of activity in-country, many NDAs appear to largely serve as rubber stamps for letters of no-objection. In some countries, rather than a vibrant agent-of-change, the NDA merely consists of a single part-time staff person. The reason for this situation sits largely with the Board's failure to set up mandatory requirements and minimum standards for what constitutes an NDA and provide the support required to empower their work. Some countries complained that the GCF shouldn't dictate the composition or functions of an NDA that somehow this could impinge on national sovereignty. However, without better guidelines that clearly outline mandatory requirements and minimum standards, without which an NDA cannot fulfill its functions, and consistent support to enable their work, the GCF will continue working with a deficient system that does not promote country ownership in climate finance.

There is thus an urgent need to set minimums for what constitutes an NDA.

Civil society stakeholders in-country should be engaged in the design of project/program proposals and informed about such opportunities in a timely manner. NDAs/FPs should establish mechanisms to engage and receive input from stakeholders. Information on on-going proposals should be also made available. Such information should be made available with ample time and in local languages to give room for civil society stakeholders' inputs, for example a minimum of 30 days for CSOs and communities to provide comments on a project/program proposal before the NDA/FP issues a letter of no-objection. English language and outreach primarily via internet are potential obstacles to stakeholder engagement.

To that end, the review should consider the nature and quality of engagement of NDAs/focal points and accredited entities with stakeholders within developing countries, including affected communities, Indigenous Peoples, women and other marginalized groups, civil society, local private sector, and local government. This should include assessments of proactive comprehensive outreach to stakeholders in-country by NDAs/focal points, and accredited entities and project implementers. A GCF review aimed at improving observer participation in GCF processes must similarly assess the availability and ease of access to information in-country about the GCF, NDAs/focal points, and accredited entities – via electronic and non-electronic mechanisms. As a possible model for country coordination and stakeholder engagement by the NDAs, the Board should consider implementing a system similar to the the Country Coordinating Mechanisms (CCM) of the Global Fund to Fight AIDS, Tuberculosis, and Malaria. CCMs serve as the chief decision-making body of the Global Fund in-country. CCMs must comply with six eligibility requirements and established minimum standards. Though not perfect, CCMs put a premium on local ownership and participatory decision-making. As UNDP notes, "CCMs have representatives from the public and private sectors including governments, multilateral or bilateral development agencies, NGOs, faith-based organisations (FBOs), academic institutions, private businesses, key populations and people living with and affected by the diseases...CCMs should have equal representation of men and women and possess strong expertise on gender balance in order to ensure effective responses to the three diseases."³

³ <http://www.undp-globalfund-capacitydevelopment.org/en/global-fund/global-fund-structure-and-actors/>.

Applying such requirements and principles in the GCF to strengthen the NDA as a country coordinating mechanism would for example involve modalities to introduce specific indicators at the country level to ensure that Indigenous Peoples' rights are fully enhance, recognized and respected.

In its review, the GCF should also consider processes and practices to remedy the dearth of in-country engagement and the development of a GCF toolkit on best-practice country coordination experiences, to help NDAs/FPs move beyond the broad guidelines established by the Board under country ownership.

(b) The resources provided to support the involvement of observers, including the use of live webcast for meetings of the Board

Live webcasting: The 13th Board meeting was the first that offered live webcasting in accordance with a mandate in the revised GCF Information Disclosure Policy (decision B.12/35). Live webcasting of Board meetings has been a consistent demand of civil society observers to increase transparency and accountability of, and participation in, GCF Board proceedings. While it is too early to fully appreciate this new welcome practice, CSO constituency experience from the 13th Board meeting has clearly highlighted the ability of off-site CSO colleagues from all over the world to consult with their colleagues in Songdo on ongoing Board discussions and to provide valuable input that in particular informed the interventions of the CSO active observers in the Board. Live webcasting has to be understood as a permanent vital and cost-effective component of expanding and improving observer participation in the Board.

The existing GCF observer guidelines (approved at the 3rd Board meeting) need to be brought in line with the GCF Information Disclosure Policy (approved at the 12th Board meeting). This is relevant with respect to the use of live webcast of Board meetings, but even more importantly to ensure CSO observer best practice access to information to improve their participation in Board proceedings.

Timely access to complete Board documents: The Rules of Procedure of the Board (approved at the 3rd Board meeting) stipulate that Board documents are to be made public at least 21 calendar days before the first meeting day. The failure to comply with this stipulation has had serious negative repercussions for the effective engagement and deliberations of both the Board and observers. For observers, including the active observers, to play a constructive part in Board proceedings, the timely release of all Board documents in a complete form (meaning including all relevant annexes, f.ex. for project/program proposals) well in advance of both formal and informal Board meetings is required.

Documents should be made public to observers complete, without missing relevant annexes or otherwise redacted. This is a particular hindrance to the ability of CSO observers to provide well-informed input (including highlighting shortcomings or problems) in the case of project/program proposals coming before the Board. For example, documentation for projects/programs publicly available before Board meetings is often significantly redacted and, in the case of private sector proposals, presented only as a summary and thus lacking required documentation provided by the project proponent, such as the project/program gender action plan, or the detailed documentation of required stakeholder consultation (including the names and affiliations of individuals and organizations being consulted), which makes it difficult to double-check and verify whether communities, women, Indigenous Peoples and broader civil society have been engaged in project development. Often,

annexes containing, for example, feasibility studies or economic assessments and detailed financial terms are not part of the published funding proposal package on the website. It would significantly increase transparency, accountability and observer participation in Board proceedings if these documents are disclosed by default. While the public release of the Independent Technical Advisory Panel's assessments and recommendations of funding proposals at the 13th Board meeting was a welcome and necessary step, in order for observers to adequately input into and assess funding proposals, this should also be the case for the Secretariat's reviews, the list of proposed conditions and recommendations, and the term sheets. Likewise, the responses and clarifications of accredited entities to ITAP assessment of their projects should be made public to give observers a more comprehensive picture.

There are also difficulties accessing Board documents during Board meetings. Draft decisions are not made available to the wider CSO observer community, making it difficult to follow the discussions. In the Board room, the active observers receive updated draft decisions late and are not given any opportunity to comment on them with an intervention to the Board. The collated decisions of Board meetings are frequently only published and shared with observers weeks after the actual meeting.

The Board documents for decisions in-between-meetings are not shared with observers at all, not even the active observers, preventing any observer participation in the decision-making process for issues addressed in-between Board meetings, including issues of paramount relevance for GCF observers (an example would be the recent approval of a decision in-between meetings of the terms of reference for a review of the GCF gender policy and action plan⁴). Decisions taken in-between meetings are likewise often shared with the wider public and observers only after considerable delay (if they are posted on the GCF website at all).

(c) The use of the GCF website, including the online registration system to support observers

Utility of the GCF Website to support the participation of observers: - The GCF website should be the main tool to provide access to information on the GCF, yet given its current state, it makes it very difficult for observers to benefit from it.

The GCF website requires further improvement to make it more user-friendly and to allow for easy access to relevant information. Observer participation could be strengthened through the enhanced provision and better organization of information on the GCF website. For example it should include a search function, which is a basic component for utility, and a project/programmes section that is (or has the option to be) organized on a regional or country-specific basis.

In particular, the work of the Board could be made significantly more accessible to observers and other stakeholders by making the following readily available on the website:

- Previous board decisions compiled by topic, so that all Board decisions on a given issue can be accessed on one page;

⁴ It should be noted that the GCF gender policy is one prime example where extensive CSO observer input and participation has shaped and improved its development through a GCF consultative process considered by CSO observers to be encouraging and forward looking. It is thus not understandable why the ToR for the review would be developed without any opportunity for CSO observers to provide input.

- A list of all committees and subcommittees and their current membership;
- For each committee and subcommittee, (a) a list of the pending tasks that have been delegated by the Board, and other issues under consideration, and (b) a Chair's summary of recent teleconferences or deliberations, posted shortly after each session.
- Updated lists, with contact information, also for all Board approved panels and advisory groups, including the Accreditation Panel, iTAP, or the Private Sector Advisory Group, etc.
- An easily accessible presentation (organized by country/region) of the full documentation for projects including project budget information that are already approved or awaiting approval (including ESS disclosures that are available in advance of other public information). Project documentation should also be tagged in such a way that it is possible to sort this information according to the portfolio of any particular accredited entity.
- An easily accessible consolidated presentation of the basic governance and accountability policies and practical information of the Fund. This section should then also include the same basic information of all accredited entities including but not limited to the AEs' respective policies and procedures regarding public engagement and consultations, information disclosure, grievance handling, procurement and integrity.

(d) The scope and capacity of the assistance and engagement to be provided by the Secretariat

CSO engagement with secretariat work is critically important for the GCF, and will only become more so. This includes much more than having a single CSO point person on the Secretariat, who assists CSO observers with some information requests or procedural informal (although appreciated), but more fundamentally speaks to the opportunities for participation and contribution of CSO observers in operational procedures and policy development conducted by the GCF Secretariat as tasked by the Board. However, to date, such engagement between Board meetings has been largely ad hoc and limited. There have been a few notable exceptions where the Board mandated robust engagement of stakeholders by the Secretariat, such as in the development of the Fund's gender policy and action plan. Established regimes of standardized consultations, according to international best practice, should be the norm.

Among others, substantial improvements are necessary with regard to the ability of observers to input on the development of Board policy papers and on the accreditation, readiness and project pipelines. Current practice, including regarding confidentiality of draft papers, severely limits the ability of observers to provide useful input. Observers' input – including constructive feedback and possible red flags around problematic areas – would be significantly more useful were it to be provided earlier in the process rather than backloaded around Board meetings when discussions may be more politicized and rushed.

Also, an easily accessible directory of Secretariat staff should be made available on the GCF website. At present, it is often difficult for observers to figure out who to contact on particular topics, and how to do so. Moreover, for those who follow the GCF closely, the responsiveness of the Secretariat often depends on the individual - with some Secretariat staff highly responsive while others are far less so.

(e) *The rules and procedures for the registration of observers for meetings of the Board.*

Current restrictions on registration of observers for Board meetings– The current practice applied by the Secretariat that permits each accredited observer organization to register only up to three people, regardless of whether it is a small NGO or a large international CSO network, has discouraged the participation of members of civil society, particularly from developing countries, and should be lifted. Especially in light of actual attendance numbers, there is no justification for such a blanket limitation.

III. The accreditation process of observer organizations

(a) *The frequency of rounds of accreditation;*

The Secretariat should at a minimum allow for new accreditations leading up to each Board meeting. As projects are now being considered by the Board, there will be new stakeholders from project/program-affected countries with an interest in following Board meetings and proceedings before and after each meeting.

In order to allow for a strengthened voice for affected communities, the Secretariat should allow for the accreditation of community-based organizations (CBOs) when the need arises on an ad hoc basis, through a process not constrained by narrow deadlines (given that CBOs face particular challenges in providing the required documentation in a timely manner, particularly if translation is necessary). In general, supporting documents for developing countries CSOs seeking accreditation should be accepted in all of the UN languages. Likewise, the requirement to submit the application form in English should be handled with the utmost flexibility possible (for example, drawing on the international background of GCF Secretariat staff and consultants).

(b) *The lead time and communication channels for calls for applications for accreditation*

In line with the mandates expressed in Rio Principle 10 and follow-up agreements⁵, the Secretariat should take special measures to ensure that affected communities are reached each time a call for application is posted. Calls for applications should be posted in all UN languages by the Secretariat, with active outreach to NDAs/focal points with a request to post the calls in their respective countries also in the native languages of affected communities. Processes should also be put in place for other related networks and lists - such as those used by the GEF, UNDP, GAFSP, SE4ALL, etc. - to distribute calls for GCF accreditation applications.

(c) *The timeline for accreditation*

The accreditation process should take no longer than 2 weeks.

⁵ Including, for example, the Aarhus Convention and the Almaty Guidelines.

(d) The duration of accredited status

The accreditation for observer organizations should be for a period of up to 10 years.

(e) The utility (form and function) of the application form;

The form and a number of questions in the application form could make it particularly difficult for community-based organizations (CBOs) to provide the required information, f.ex. the requirement to list “well-organized administrative structure” or “information on climate change activities undertaken.” The closer a CBO is to the community and community needs, the more difficult it might be to fulfill this requirements, although it is particularly these voices that are currently significantly under-represented in Board proceedings. The application form in its current form could serve as a deterrent -- as does the requirement to submit the application form in English and supporting documentation in English translation. In order to encourage and facilitate the application and engagement of CBOs, different forms of information provision (videos or community testimonials) might have to be considered as proof of the relevance and benefit of an applicant CBO’s engagement as observer with the Fund.

IV. Participation of active observers in meetings of the Board**(a) Observer constituency representation arrangements;**

We strongly advocate for an expansion of GCF constituency representation, with consideration of additional active observers for Indigenous Peoples given priority consideration. The GCF should assess the modalities required to recognize Indigenous Peoples as separate constituency, in line with UNFCCC and GEF practice.

The current allocation of 2 seats for CSO active observers (one from developed and one from developing countries) makes it very challenging for them to effectively represent their diverse constituencies. While the GCF only recognizes two observer constituencies -- civil society and private sector -- the UNFCCC recognizes nine. However, it should be noted that the UNFCCC initially started out with just two constituencies -- business and industry, and environmental NGOs. Because of the recognition of the diversity of concerns represented, UNFCCC constituencies now also include local government and municipal authorities, Indigenous Peoples Organizations (IPO), research and independent NGOs, trade union NGOs, farmers and agricultural NGOs, women and gender NGOs, and youth NGOs.

The best practice experiences of several existing multilateral funds (in the climate field and in the areas of food and health) reveal that the GCF currently utilizes more restrictive observer constituency representation arrangements than most of its peers. For example, in addition to representatives from CSOs and the private sector, the Global Fund to Fight AIDS, Tuberculosis and Malaria provides for representation on the Board (with voice and vote) of specially targeted stakeholders and beneficiary groups such as communities affected by HIV, TB and malaria.⁶ In the Climate Investment Fund’s Pilot Program for Climate Resilience Sub-Committee, one representative “from a community dependent on adaptation approaches to secure

⁶ <http://www.theglobalfund.org/en/board/>.

livelihoods” is also given active observer status.⁷ In several existing multilateral climate funds, Indigenous People have full member or active observer representation separate from that of CSOs. The UN REDD Programme has a permanent observer from Indigenous Peoples in its Executive Board.⁸ All of the CIFs (the Clean Technology Fund, Strategic Climate Fund and its three subcommittees) have at a minimum each two IP active observers.⁹ And in the GEF, in addition to their designated representatives in the GEF CSO Network, there is a separate Indigenous Peoples Advisory Council.¹⁰

(b) The role of alternate active observers;

The role of alternate active observers should be strengthened to better support the representation of diverse constituencies, including by formally recognizing alternative active observers (and posting their names and affiliations on the GCF website) and allowing them into the Boardroom.

The observer participation guidelines should be updated to allow at the minimum one alternate observer per active observer to be in the Board room at the same time as the active observer. This is already best practice at the GAFSP, where each active observer has one or more alternates sitting behind them and also able to take the floor if needed¹¹. Even with one alternate active observer allowed in the room, the level of representation and counsel would be less than that allotted to a Board member - each of whom has an Alternate Board member and two advisors (for the Board member and his/her Alternate). Alternate active observers should be allowed to speak on behalf of CSOs when the active observer has left the Board room.

Given the workload and vast swath of constituency representation expected of the active observers, alternate active observers should receive the same level of Board/Secretariat access and communication as the active observers. At the moment, neither the GCF Rules of Procedure nor its observer participation guidelines formally recognize the designation of permanent alternate active observers. Given the minimal representation of two CSO active observers in Board proceedings (who are technically tasked to consider the inputs of eight UNFCCC stakeholder constituencies, including women, Indigenous Peoples, farmers and academia), formal recognition of and support for alternate CSO active observers becomes even more important. CSOs engaged in the GCF already select alternate active observers through the same self-selection process as the active observers.

Pending a formal GCF decision and/or COP guidance on a dedicated seat for Indigenous Peoples at the GCF, the Rules of Procedure should allow for the possibility of rotation of seats for Indigenous Peoples observers to act as active observers within the recognized constituencies and on the occasion of Board decisions that have particular relevance to Indigenous Peoples.

⁷ CIF (2009), Guidelines for inviting representatives of civil society to observe meetings of the CIF Trust Fund Committees, para. 7, p. 3. See: <https://www-cif.climateinvestmentfunds.org/sites/default/files/Guidelines%20for%20Inviting%20Reps%20of%20Civil%20Society...pdf>.

⁸ <http://www.unredd.net/about/un-redd-programme-governance/executive-board.html>.

⁹ http://www-cif.climateinvestmentfunds.org/sites/default/files/web_page_observer_representation.pdf.

¹⁰ <https://www.thegef.org/gef/indigenous-peoples>.

¹¹ Drawn from authors’ written exchange with the developed country CSO active observer in the GAFSP on their Board room practices.

(c) Observer engagement in Board committees and in decisions taken between meetings

Observer engagement in Board committees and decisions taken between meetings leaves much to be desired. It is also not in line with the practice of other funds, for example the GAFSP where the active observers and their alternates are not only active observers in all working groups and their proceedings between sessions, but even can propose for a working group on a specific issue to be created. They can also ask for another CSO representative to participate in working groups if they have a particular expertise.¹² Likewise, CSO observers in the GPE are participating in all committees in between Board meetings.¹³

The current GCF practice that limits active observer participation to Board meetings does not give full effect to the Board's Rules of Procedure (para. 37) that provides that active observers may participate in the proceedings of the Board, which would also include work in committees and between meeting decisions. The work of committees and "between meeting" decisions should be significantly more transparent, including through timely access to information, and more open to civil society inputs.

For example:

- In line with the Rules of Procedure (para. 41), active observers should receive copies of proposed between meeting decisions at the same time as Board members to allow them to share CSO concerns and recommendations with Board members.
- CSO participation in Board committees could be strengthened and the committees' work made more transparent by, for example, posting more information on the work of the committees, including their up-to-date composition and timely Chair summaries of committee discussions on the GCF website.
- The CSO active observers and their alternates should be allowed to attend and participate in Board committee meetings, with the CSO active observers in charge of assigning their alternates to participate in specific committees on their behalf. The existing observer guidelines, especially para.14, should be changed to allow active observers and alternates to attend meetings of Board committees or working groups by default unless deliberations unambiguously fall under the GCF information disclosure policy on instances justifying non-disclosure.

(d) The seating of active observers in the Board room

Currently, the physical accommodation of active observers -- "hidden" on a separate side table at the very back-end of the Board room -- sends an unwelcome signal regarding the importance of active observer participation in the GCF Board. The seating arrangement short-changes effective engagement with the Board, as it makes it harder for GCF Board members to hear and react to active observer inputs. Seating the active observers at the same table as Board members, as is existing practice for example in the CIFs, GPA and the GAFSP would also visibly designate active observers and their inputs as an integral part of Board proceedings.

The physical presence of active observers providing real-time input into Board room discussions is an indispensable way of connecting the decision-making by the GCF Board to the needs and concerns of a wider set of stakeholders. Innovative new funds like the GAVI Alliance and the Global Fund have recognized this by not

¹² Ibid.

¹³ Drawn from the authors' exchange with the Northern CSO observer in the GPA on their practices.

only giving CSO representatives a (literal) seat at their respective Board tables, but also a formal decision-making voice and vote. While in the GCF the active observers, of course, do not have decision-making power in the Board (nor are we seeking such power), there is no reason under the Governing Instrument to relegate them to a literal backbench in GCF Board proceedings.

(e) *Active observer participation in Board discussions*

In addition to what has been mentioned above, the Board should reconsider the informal practice whereby the co-chairs permit the active observers to speak from the floor only when the discussion of an agenda item is largely completed, and often do not allow comments on new draft decision text brought up for Board consideration. It is also frustrating that when time is tight, our interventions are almost always the first to be cut off. To be maximally effective, and to demonstrate due respect to the input of civil society, active observers' interventions must not be treated as an add-on or token window dressing and instead be heard as part of the ongoing Board discourse. Further, active observers should be given the floor more than once, if necessary, should the discussion demand it.

Additionally, we encourage the GCF Board to emulate the practices of the CIF Trust Fund Committee, whereby active observers have the right to request the addition of items to the meetings' provisional agenda and to request expert presentations.¹⁴ In the GAFSP and the GPA likewise, active observers can propose agenda items and can even propose for working groups to be created to explore an issue they raise.¹⁵ These practices should be emulated in the GCF Board discussions.

(f) *Financial support for developing country observers*

The current practice of not providing financial support for developing country observer participation is a main hindrance to stronger engagement of developing country CSOs in Board proceedings. We would hope that we don't have to provide further explanation as to why much stronger engagement by developing country CSO is fundamental to the DNA and the legitimacy of the Fund. As the biggest multilateral public climate fund, the GCF should be able to afford financial support for a select number of developing country CSO observers under the Secretariat's administrative budget. Such financial support for CSO observer participation would be in line with that provided by the UNFCCC financial mechanism's other operating entity, the GEF, which covers the travel costs of CSO representatives from recipient countries to attend its Council meetings.¹⁶ As early as 1995, the GEF Administrative Budget set aside US\$ 50,000 annually for that purpose, and has increased resources for this purpose significantly since then.¹⁷ The work of the GEF CSO Network is also supported by a GEF CSO Voluntary (Trust) Fund. Likewise, the CIF Administrative Unit covers travel costs for observers from developing countries

¹⁴ CIF (2009), Guidelines for inviting representatives of civil society to observe meetings of the CIF Trust Fund Committees, para. 3, p. 2. See: <https://www-cif.climateinvestmentfunds.org/sites/default/files/Guidelines%20for%20Inviting%20Reps%20of%20Civil%20Society...pdf>.

¹⁵ Drawn from authors' written exchange with the developed country CSO active observer in the GAFSP on their Board room practices.

¹⁶ GEF (2010), The GEF and Civil Society Organizations: A strategic Partnership

¹⁷ GEF document GEF/C.34/9. See:

https://www.thegef.org/gef/sites/thegef.org/files/documents/C.34.9%20Summary_English.pdf.

attending the Trust Fund Committee meetings upon request.¹⁸ In both funding mechanisms, civil society self-selects which CSO colleagues should be financially supported to attend the meetings of the funds' decision-making bodies, taking into account gender and geographical balance, among other considerations.

The Global Agriculture and Food Security Program (GAFSP) goes even further by supporting the travel of its developing country (active) CSO observers not only to GAFSP meetings, but also to GAFSP recipient countries to visit project sites. In the GAFSP, up to US\$ 200,000 per developing country active observer representative (the GAFSP has two) could be committed for this purpose and to ensure greater developing country civil society participation.¹⁹ In the GCF likewise, better financial support for developing country CSO participation at the country and Board level needs to be supported (for example with targeted funding via readiness programming in addition to direct Secretariat financial support).

Given these funds' better practices, at a minimum, financial support for developing country active observers and their designated alternates should be provided for participation in all Board proceedings, including informal Board meetings and relevant committees and expert panel groups with Board participation, such as the PSAG, in line with the GCF's practice of financial support for participation in such meetings for developing country Board members, alternates and their advisors. To that effect, a line item "observer support" should be added to the GCF Administrative Budget for 2017, which the GCF Board will consider at its 15th meeting in December.

Contact points for questions or comments regarding this joint CSO submission:

Liane Schalatek
Developed Countries CSO Active Observer
Heinrich Böll Stiftung North America
Liane.schalatek@us.boell.org
Ph: +1-202-290-0956

Lidy Nacpil
Developing Country CSO Active Observer
Asian Peoples Movement on Debt and Development (APMDD)
lnacpil@gmail.com
Ph: +6329253036

¹⁸ CIF (2009), Guidelines for inviting representatives of civil society to observe meetings of the CIF Trust Fund Committees, para. 17, p. 5. See: <https://www-cif.climateinvestmentfunds.org/sites/default/files/Guidelines%20for%20Inviting%20Reps%20of%20Civil%20Society...pdf>.

¹⁹ <http://www.gafspfund.org/content/civil-society-organizations>.

ANNEX:

List of CSOs having contributed to this submission (in alphabetical order):

- ActionAid International
- Asian Peoples Movement on Debt and Development (APMDD), Philippines
- Centre for 21st Century Issues (C21st), Nigeria
- Friends of the Earth US, United States of America
- Heinrich Böll Stiftung North America, United States of America
- Interamerican Association for Environmental Defense (AIDA), Latin America
- HELVETAS Swiss Intercooperation, Switzerland
- Sierra Club, United States of America
- Tebtebba (Indigenous Peoples' International Centre for Policy Research and Education), Philippines
- Third World Network, Malaysia
- Transparency International, Germany
- University of Manchester, Institute for Development Policy and Management, United Kingdom

List of CSOs supporting this submission (in alphabetical order):

- Abibiman Foundation, Ghana
- Alliance of Community Cooperatives of Ethnic Groups, Vietnam
- All Nepal Women Association (ANWA), Nepal
- Asia Indigenous Peoples Pact (AIPP), Thailand
- Association Nigérienne de Scouts de l'Environnement de Niger, Niger
- Both ENDS, the Netherlands
- Carbon Market Watch, Belgium
- CARE International
- Center for International Environmental Law (CIEL), United States of America
- Centre for Socio-Economic Research and Development Nepal (CERDN), Nepal
- Centre for Research and Development in Upland Area (CERDA), Vietnam
- Centre pout L'Environnement et le Developement Cameroun/Friends of the Earth Cameroon
- Circle of Reflection and Action for Sustainable Development (CeRADD NGO), Benin
- Civic Concern Nepal (CCN), Nepal
- Derecho, Ambiente y Recursos Naturales (DAR), Perú
- Environmental Rights Action/Friends of the Earth Nigeria
- Foundation for Gaia (GAIA), UK
- Freedom From Debt Coalition, Philippines
- Friends of the Earth Canada
- Friends of the Earth Togo
- Germanwatch, Germany
- Global Ecovillage Network (GEN), UK
- Greater Active Reconstruction & Justice Action Network-Nepal (GARJAN-Nepal)

- Green Development Advocates (GDA), Cameroon
- Humanist Institute for Co-operation with Developing Countries (HIVOS), The Netherlands
- Institute for Policy Studies, United States of America
- Intercooperation Social Development India (ICSD), India
- International Rivers
- Kitanglad Integrated NGOs (KIN), Philippines
- Koalisyon Pabaha ng Pilipinas, Philippines
- Labour, Health and Human Rights Development Centre, Nigeria
- Make it Real with Africa (MIR AFRICA)
- Maleya Foundation, Bangladesh
- Maudesco/Friends of the Earth Mauritius
- The Network of African Youths for Development (NAYD), Continental Africa
- Oxfam
- Pakistan Fisherfolk Forum, Pakistan
- Pan African Climate Justice Alliance (PACJA), Kenya
- Planetary Association for Clean Energy (PACE), Canada
- Prakriti Resources Centre (PRC), Nepal
- SANLAKAS Philippines
- SustainUS: U.S. Youth for Justice, United States of America
- Women's Environment and Development Organization (WEDO), United States of America
- Women Welfare Society (WWS), Nepal
- WWF International