

CSO Suggestions and Recommendations for the Review and Update of the Green Climate Fund Gender Policy and Action Plan

I. Introduction

The Green Climate Fund (GCF) was designed by the Transitional Committee (TC) which elaborated the GCF Governing Instrument to be a paradigm shifting, transformational fund that goes beyond business-as-usual (BAU) approaches in supporting developing countries in the context of sustainable development in their climate actions toward low-emission and climate-resilient development. The TC recognized that a commitment to support gender equality and women's empowerment in climate actions is a fundamental part of such a paradigm shift and transformational change that the GCF seeks to engender through its investments in recipient countries. With key references to gender in the Governing Instrument, including the mandate for a gender-mainstreaming approach as a key objective and guiding principle (in para.3), the GCF became the first multilateral climate fund to commit to integrating gender considerations from the very outset in its operationalization.

When the GCF Gender Policy and Gender Action Plan (GCF GP/GAP) were approved at the 9th GCF Board meeting in March 2015 with decision B.09/11, both documents codified the GCF's commitment to further improve the integration of gender considerations throughout all of the GCF's actions and policies by taking a gender mainstreaming approach. As such, the GCF Gender Policy and Gender Action Plan acted as an overarching framework, but not as a replacement for continued necessary gender considerations in the elaboration of specific operational policies, processes, and procedures. In fact, a number of gender mainstreaming-relevant decisions had been taken before the approval and articulation of the GCF Gender Policy and Gender Action plan, including on Options for a Fund-wide gender-sensitive approach (Decision B.06/07), the Accreditation Framework (Decisions B.07/02 and B.08/02), the Initial Proposal Approval Process (Decision B.07/03), the Initial Investment Framework (Decision B.07/06), the Results Management Framework (Decisions B.07/04 and B.08/07), Country Ownership (Decision B.08/10), and the Readiness Support Programme (Decision B.08/11).

By articulating specific overarching principles in its gender policy, and specific activities and approaches in the 3-year Gender Action Plan, the Fund consciously created a transparency and accountability framework in order to hold to account the decision-making by the GCF Board; the relevant oversight and due diligence as well as guidance provided by the GCF Secretariat to the GCF partners; the strategic planning and promotion of country ownership by the National Designated Authorities (NDAs) and focal points in recipient countries; and lastly the Accredited Entities (AEs) and all implementation partners for how well they do on the integration of gender equity and equality concerns and empowerment actions in all of their respective responsibilities and activities.

With the GCF now fully operational and with 43 project/programme proposals worth US\$2.2bn in GCF support already approved, the review of the GCF Gender Policy and Gender Action Plan comes at an important time to apply first lessons learned and improve policies, guidance, processes, and procedures throughout GCF operations. Thus, the GCF Gender Policy and Gender Action Plan should not be looked at in isolation, but in conjunction and coordinated with other important GCF policy (review and further development/improvement) mandates, including for, *inter alia*:

- The review of observer participation in Board proceedings
- The elaboration of country ownership guidelines
- The efforts for the revision of the proposal approval process
- The development of a simplified approval process
- Implementation efforts under existing GCF pilot programmes, such as the Enhanced Direct Access and Private Sector Micro-, Small- and Medium-Sized Enterprises Pilot Programmes
- The full operationalization of the GCF Accountability Mechanisms, in particular through the ongoing review of the terms of reference for the Independent Redress Mechanism and development of its procedures, and the elaboration of the Independent Evaluation Unit work programme
- The development of further sub-criteria and benchmark criteria for the Investment Framework
- The further development of the Performance Measurement Frameworks for adaptation and mitigation, including through the refinement and articulation of additional indicators and relevant methodologies
- Ongoing reviews of the Independent Technical Advisory Panel and the Accreditation Panel respectively
- The further elaboration of the Environmental and Social Management System (ESMS) of the GCF, including the articulation of its Environmental and Social Policy (ESP) and the development of the GCF's own environmental and social safeguards (ESSs)
- The development of an Indigenous Peoples Policy
- The application of results-based payment approaches in the GCF, including with the upcoming request for proposal for results-based payments for REDD+

II. Inputs requested

In its call for public submissions on the review of the GCF Gender Policy and Gender Action Plan, the Secretariat provided a list of questions for consideration to be addressed and to guide public response. We welcome the opportunity for CSO observers to provide critical input, as CSOs have been instrumental in both the advocacy push for the GCF Gender Policy and Gender Action Plan and its original development. We would urge the Secretariat to utilise the gender expertise among CSO observer organizations in the further review process beyond just this call for public input, including through comments on the findings of the analytical desk review as well as on the draft updated Gender Policy and Gender Action Plan, before its scheduled consideration and approval by the Board at its 18th Board meeting.

Below are comments in response to those questions submitted on behalf of numerous civil society organizations¹ who follow and work to ensure that the GCF maintains the highest standards and that GCF projects and programmes not only do not harm people or the environment, but take proactive steps to promote gender equality and to support women's empowerment, in particular through the participation of marginalised and vulnerable individuals and communities in the design, development, implementation, and monitoring of those strategies and activities. CSOs engaged in the GCF through their responses provided here would also like to ensure that the operational policies, Board decisions, Secretariat actions, implementing partners' practices, and recipient country structures and procedures for engagement with the Fund are likewise in support of these objectives.

Some key observations:

CSOs working on this submission felt that it would have been helpful to base our inputs on a policy review of experiences and lessons of the current Gender Policy and Gender Action Plan (GP/GAP). As outlined in the terms of reference for the review of the Gender Policy and Gender Action Plan², such a desk policy and project review of the extent to which gender considerations are taken into account in the GCF should have been the first step in preparing an updated Gender Policy and Gender Action Plan. Such an analysis should cover: a) experiences from implementation, including a thorough analysis of the extent to which gender is considered in all the 43 projects and programmes approved so far (with recommendations for project/programme-specific improvements, since so far only one of the projects is under implementation), and b) the identification of lacunae in the existing GP/GAP to be addressed urgently as part of the update.

A similar policy review was carried out by the World Bank's Climate Investment Funds (CIFs)³ in preparing their first Gender Action Plan as well as for its phase 2 adopted in December 2016⁴ and would be useful for the GCF. Should such a policy review and analysis still be planned by the GCF Secretariat, it would be useful for CSOs active on gender and climate change issues to be able to review such an analytic report and to provide comments.

Further, a review of the GCF Gender Policy and Gender Action Plan should draw on learning experiences from gender action plans, gender mainstreaming efforts, and experiences of other climate funds such as the CIFs⁵, the GEF⁶, the Adaptation Fund⁷, and other international financial

¹ A number of civil society organizations provided input to this submission and additional civil society organizations signed-on in support of the joint CSO submission. They are listed at the end of this submission.

² See GCF Board decision in-between meetings B.BM-2016/12; available at: https://www.greenclimate.fund/documents/20182/183823/B.BM-2016_12_-_Updating_the_Green_Climate_Fund's_Gender_Policy_and_Action_Plan.pdf/7f9c1d0e-88c2-4be8-8a92-91fc994e0377.

³ See http://www.climateinvestmentfunds.org/sites/default/files/CIF_GENDER_REVIEW_FINAL_March_11.pdf

⁴ See https://www.climateinvestmentfunds.org/sites/default/files/ctf_scf_decision_by_mail_cif_gender_action_plan_phase_2_final_revised.pdf.

⁵ <http://www.climateinvestmentfunds.org/about/gender>.

⁶ <https://www.thegef.org/topics/gender>.

⁷ https://www.adaptation-fund.org/wp-content/uploads/2016/04/OPG-ANNEX4_Gender-Policies-and-Action-Plan_approved-in-March-2016.pdf.

institutions that have produced considerable output of knowledge products, exchanges, training resources, etc. on gender work.

The review of the GCF GP/GAP should work towards better alignment with gender policies and action plans of other climate funds and UN bodies, including the UNFCCC (which is in the process of developing its own gender action plan⁸) and promote knowledge exchange on the development, implementation, and monitoring of these policies and plans, for example through regular, more formalized meetings between gender focal points of the different funds and representatives of UN agencies, including the UNFCCC and UN Women.

In the long-term, collaborative efforts among climate funds could focus on jointly elaborating and agreeing on a consistent set of standards for environmental and social safeguards and related management systems, as well as for gender equality support and gender mainstreaming efforts. Such a harmonization would need to reflect international best practices, have a strong human and women's rights framing, and build on the strongest policies that funds currently have in place.⁹

- (a) **Accountability: What are some mechanisms that need to be put in place to ensure quality and enhanced results of the existing GCF Gender Policy and Action plan, including activities and processes related to their development, implementation, and reporting?**

The GCF Gender Policy focuses on accountability as one of its core principles, with the GCF Gender Action Plan outlining how accountability can be strengthened through focus on improving governance and strengthening key institutional players and their respective responsibilities, the processes and guidelines necessary in supporting the implementation of those responsibilities, including through capacity-building, and what indicators are needed for monitoring and reporting purposes. Both documents already articulate a number of key measures and actions that, in theory, if followed through would go a long way towards ensuring enhanced gender equality and women's empowerment results in GCF actions.

Improve Follow-Through:

While additional actions could be outlined as part of the revision, going forward, the primary impetus must be on ensuring implementation of already agreed upon principles and ideas articulated in the GP/GAP necessary for mainstreaming gender into GCF operations. This can be facilitated by creating a detailed action plan beyond the current insufficient descriptive narrative. The detailed action plan must list clear required actions, identifies the responsible actors, timelines, and deadlines, identify indicators to measure the outputs and outcomes of required

⁸ At SB46 in May 2017, the UNFCCC held a workshop related to development of its Gender Action Plan, http://unfccc.int/files/gender_and_climate_change/application/pdf/170517_sbi_informal_workshop_summary_web.pdf.

⁹ See for example the recent WRI report, *The Future of Funds*, available at: <http://www.wri.org/publication/future-of-the-funds>.

actions, and describe sanctions or mandatory follow-ups in cases where they are not taken or unsuccessful. Such a detailed gender action plan was originally outlined for Board consideration at the 9th GCF Board meeting, but was not approved.¹⁰ This has to be remedied as part of the review and upgrade going forward. Further, such an expanded gender action plan to accompany a strengthened gender policy must include clear budgetary/cost requirements. It would have to be updated regularly in conjunction with annual reviews on implementation progress of the GP/GAP. It should also be correlated with the annual work programmes of the GCF Board and Secretariat to ensure that policy development and required policy and operational guidelines updates include gender considerations and are gender-responsive.

Regular reporting on the implementation progress of the GP/GAP is indispensable to strengthen accountability. The GP/GAP foresees **an annual progress report to the Board**, but such a report was not submitted for Board consideration over the last two years. Going forward, regular progress reporting should be instituted, for example, in the form of an annual progress report (such as is the practice in the GEF or CIFs respectively) or even **in the form of a standing Board agenda item** (similar to regular progress reports on the project pipeline or the readiness program at each Board meeting).

Such an annual progress report by the Secretariat to the Board could include coordinated input/commentary from implementing partners and stakeholders to include institutional as well as portfolio and project-level review.

A **GCF annual gender mainstreaming progress report to the Board** should be timed mid-year so as to **include summary gender findings into crucial external accountability reporting**, such as the mandatory annual GCF report to the COP. This would not only increase the accountability of gender mainstreaming progress (or lack thereof) to UNFCCC parties, but also allow for improved guidance on gender efforts by parties toward the UNFCCC's financial mechanism and a better alignment with UNFCCC COP decisions and mandates, including on gender and climate change and the UNFCCC's own gender action plan.

Both quantitative and qualitative indicators are crucially important to track progress on gender mainstreaming and gender-responsive implementation in the actions of all GCF bodies and partners at the portfolio level as well as at project level and in in-country engagements. They should be articulated and included in an updated and detailed revised gender action plan.

On the **portfolio level**, the GAP currently already foresees two **gender-focused portfolio indicators**, neither of which are currently applied (GAP, para. 12). While a **quantitative assessment** of how many GCF projects include gender elements at the proposal stage is a first start, it needs to be complemented by a **qualitative assessment** of the level of gender-responsiveness at project entry. The GAP already proposes the development of a portfolio classification system to that effect, which has not been realized yet. Such a classification should not only **look at quantity and quality at entry, but also throughout implementation and at project end**. Thus, the integration of gender reporting in the monitoring and accountability framework, particularly in the annual self-

¹⁰ See Annex IV of the draft Gender Policy and Gender Action Plan submitted for Board consideration at the 9th GCF Board meeting; available at: http://www.greenclimate.fund/documents/20182/24949/GCF_B.09_10_-_Gender_Policy_and_Action_Plan.pdf/fb4d0d6c-3e78-4111-a01a-e5488f9ed167

reporting, half-time project assessments, and final project assessments must be strengthened, including through Secretariat and independent/third party verification. This is the prerequisite to allow for **aggregated portfolio-level reporting on quantity and quality in implementation and at exit** by the Secretariat, for example as part of its regular gender progress reports. Such a portfolio overview would be also what the **Independent Evaluation Unit** could build on in separate gender impact evaluation reports, for example, at the end of a time-bound updated GCF GAP.

Gender-specific portfolio indicators are adding to already mandated **gender-responsive results management (RMF) and performance measurement frameworks (PMF)** (decision B.08/07) for which gender-disaggregated and gender qualitative data collection at the project level related to core and outcome indicators is the prerequisite. The PMFs for mitigation and adaptation with their respective indicators need further strengthening, including through **better guidance for Accredited Entities (AEs) on the methodologies for gender-disaggregated data collection** for those already approved indicators to increase their gender-responsiveness. For example, with the GCF moving ahead with large infrastructure investment under adaptation (impact area “the built environment”), it is crucial that related indicators are gender-responsive and ensure such investments meet the needs of both men and women and do not add extra burden on women. **The further improvement of the gender-responsiveness of the PMFs should be an action item under the revised GAP.** Likewise the **development of the sustainable development co-benefit indicator**, already foreseen under the mitigation PMF, should be a priority going forward and a similar indicator should be established for adaptation performance measurements to look at.

At the **project level**, Accredited Entities (AEs) should be mandated to **collect and provide gender-disaggregated baseline and progress data throughout the project cycle**. The updated GP/GAP should **include a clear requirement for the use of gender-disaggregated data and gender analysis at all stages of a project**, including planning; risk assessment; assessment of impacts on land, forests, income, property; consultation; participation; implementation; monitoring; reporting; identification of harms caused by a project; correction of harms caused by a project, etc. Qualitative and quantitative indicators must take into account the local realities of the communities that the projects are addressing and should be developed in consultation with the communities as part of a **participatory monitoring approach**, which is already mandated under the Initial Monitoring and Accountability Framework. The GAP should include as one action item the **development of metrics assessing the extent of use of gender-disaggregated data** in all proposals and all aspects of GCF projects.

Improvements in Accreditation Practice:

The GCF implements through **Accredited Entities (AEs)**, which therefore must be held accountable as key actors in how gender-responsive GCF projects/programmes are and to what extent they promote gender equality and the empowerment and agency of women in recipient countries. Their ability to do so is checked via the **fit-for-purpose accreditation approach (decision B.08/02)** with **proof of relevant gender-competence as requirement for any applicant entity** irrespective of scale, risk-level, or fiduciary complexity of its accreditation request. This should be maintained in a possible review of the GCF’s accreditation approach.

Nevertheless, the **accreditation practice over the last few years has revealed some weaknesses that the GP/GAP should address in its upgrade.** For example, despite the clear requirement for applicant entities to demonstrate gender competency (such as in the form of an own gender policy) a number of entities were accredited “conditionally” without having such institutional gender policy, procedures, or competencies in place. It is not transparent, how and when the Secretariat and the Accreditation Panel decide that an organisation has fulfilled the requirement in a substantive as well as timely manner. Moreover, and even more worrisome, the writing of a missing gender policy (often through an external consultant) to fulfill an accreditation condition is not proof of the establishment of relevant institutional gender competency in the accredited organization, and thus contributes to the sidelining of gender within the accredited entity, which keeps on preparing its project and program proposals for the GCF without gender mainstreaming them.

To address those weaknesses, with respect to gender accountability through accreditation of AEs, the GCF GP/GAP should focus on **developing better gender policy guidance for applicant entities** as well as **improving the gender due diligence for the application review.** For example, by its own admission, the Accreditation Panel (AP) is lacking social and gender expertise among its technical experts. Currently, in evaluating if the accreditation requirements for compliance with the GCF gender policy are fulfilled by the applicant entity, the AP focuses primarily on whether a gender policy/procedures/capacity exists at the applicant entity (the paper trail) instead of looking at the actual implementation experiences and its real impacts on project/programme affected people (the entity’s gender-related internal and external track record). This is also a problem with respect to evaluating the ability of applicants to implement environmental and social safeguards and should be improved. The current review process of the mandate and work of the Accreditation Panel provides an opportunity. In addition, the **strengthening of the gender expertise of core GCF technical and review panel such as the AP, should be a strong focus of the GCF GAP going forward.**

Additionally, more **capacity building for institutional gender capacity for applicant entities, particularly direct access and private sector entities, as well as continued gender capacity building once entities are accredited,** is clearly needed and should be a focused action under the updated GCF GAP. For applicant entities, this must be provided as part of readiness financing. While currently readiness financing, including for support for the accreditation of direct access entities, is only provided at the request of the National Designated Authorities (NDAs), which have to endorse direct access entities’ application, the GCF Secretariat should retain the ability to use readiness finance to support institutional gender capacity building for applicant entities, even in cases where the NDAs do not specifically request for it, or for international access or private sector applicant entities with significant gender capacity weaknesses (which do not need NDA endorsement). With support measures in place, **proven applicant entity gender capacity should be first verified, and only then should the accreditation take place.** Ultimately, no applicant entity should be accredited without exhibiting a strong gender policy and/or strong institutional gender commitments and procedures (including their own staff’s gender capacity and expertise). **Otherwise, the ability of the AE to meet the GCF gender policy requirements in implementation is in doubt.**

Accredited Entities (AEs) and gender-responsive project/programme implementation:

According to the GCF GP/GAP, the AE will be responsible for implementing the GCF gender policy as it relates to Fund-approved projects and programmes through in-country project identification and implementation, as well as for results reporting (GP, para. 12). This responsibility covers project design and development; gender equitable stakeholder consultations; the mandatory initial socioeconomic and gender assessment with collection of gender-disaggregated baseline data, implementation budget, and impact indicators; and screening for gender-responsiveness at various stages of the project cycle (GAP, para. 7).

Although the AE's responsibilities are clearly outlined in the GCF GP/GAP, the **implementation of these responsibilities by the AEs so far has been highly uneven and often lackluster**. While currently only one of 43 approved GCF projects/programs is under implementation, the preliminary analysis of the publicly available project/programme proposal documents for these approved projects/programmes and related support documents show some significant weaknesses. It is here that the planned analytic desk review as part of the GCF GP/GAP update should focus particular attention.

While all publicly available project documents for the 43 projects/programmes do make some reference to gender, in a significant number of project documentations it is only **cursory and not as part of a gender-mainstreaming approach**. For example, a number of project/programme proposals assess the role of women in the country where the project is to be implemented very generically, but do not take the next step and develop project-specific implementation actions to address some of the reported gender inequalities or challenges. Where project-specific activities are elaborated in the narrative, frequently they are not reflected in the implementation budget as specified budget line items. Likewise, the integration of gender-specific actions in the risk management or as project-specific gender-responsive indicators in the performance measurement log-frame is often missing. Quite frequently, gender-specific activities are "outsourced" and actions merely are "adding women", thus reducing the likelihood of their thorough integration with the rest of the project activities. This also undermines the ability of the AE project team, which very often does not include a gender and social expert but relies on consultants, to provide sufficient oversight of executing entities during implementation, including in backstopping them with gender expertise as needed.

It is noteworthy that the **mandatory initial socioeconomic and gender assessment**, which the GCF Secretariat likes to see accompanied by a **project-specific gender action plan**, is usually included in the project documentation to the Secretariat as a separate annex. This annex has only been provided to the public since the 15th Board meeting, with project approval occurring since the 11th Board meeting. Thus, there is no public record of the existence of an initial gender assessment and related gender action plan for the first 27 approved GCF projects. It is to be feared that in some cases, they simply do not exist. In contrast, **publishing the gender assessments and project-specific gender action plans on the GCF website**, as has happened for the last 16 project/program proposals approved, **creates accountability through transparency**. These documents should be **included in the project/programme-specific sub-pages on the GCF website**.

Increasing accountability through more transparency also holds true for the **detailed description of in-country stakeholders' consultations** during project design and development, which in line with the GCF GAP **should be conducted by the AE in a gender equitable way** and which is a requirement for all projects/programs irrespective of risk categorization under the interim environmental and social safeguards (ESS) process and performance standards (as PS 1 applies to all projects/programmes). However, the description of stakeholder consultation in published project documentation is often only cursory and with few details. The **annexes detailing consultations during the project preparation phase as well as those for a stakeholder engagement plan during project implementation are currently not publicly available**. Thus, how gender equitable and gender-responsive they are is unknown to the public. Again, the mandatory disclosure of these project-related documents will contribute to GCF and AE gender accountability. **Increasing the transparent and early disclosure of gender relevant project/programme documentation** should be an important priority to the GCF GP/GAP review and update.

Under the GCF **initial monitoring and accountability framework, the review of project/programme implementation progress by the AEs currently takes the form of annual self-reporting**. While the GCF Secretariat might do spot-checks, those are likely to be cursory and infrequent. As part of the GAP and to improve the learning on gender mainstreaming efforts in project/programme implementation, the **Secretariat should commit to do regular "gender checks" of project/programmes under implementation**. To ensure that the AEs in their self-reporting pay detailed attention to a quantitative and qualitative analysis of gender mainstreaming efforts and successes during implementation, the **Secretariat should provide some guidance for AEs on how to report gender mainstreaming successes, challenges or failures** during project / programme implementation.

Gender-related due diligence in project/program proposal review:

The GCF Secretariat and the Independent Technical Advisory Panel (ITAP) share duties in providing **due diligence review for project/program proposals, including for the quality of their gender-consideration**. While the Secretariat performs a completeness check of required documentation and provides a thorough assessment against the ESSs and the gender policy, the ITAP focuses on evaluating proposals against the investment framework criteria (which include some gender-relevant components). The **Board then provides the ultimate check through its approval or rejection of the project**.

Unfortunately, despite uneven and often lackluster attention to gender in the project/programme proposals submitted up to now by AEs for Board consideration, these existing due diligence systems and procedures currently do not **hold AEs sufficiently to account for poor or non-compliance with the GP/gender mandates**. While the Secretariat assesses gender performance as part of its due diligence, the Secretariat's project proposal reviews are currently not made public. This should be remedied immediately and could be done by a simple management decision. The ITAP's project proposal review on the other hand is publicly available, but the ITAP very inconsistently reflects on the quality of gender integration; instead, it often only mentions (and not for all project proposals) that a proposal pays some attention to gender (a mere existence, not a

quality check). This **lack of attention to gender in the technical experts' assessment** probably reflects largely the fact that the ITAP members, often with specific sectoral expertise, have very little gender and broader social expertise. This should be tackled with a **focus in the GCF GAP on increasing the gender expertise in technical expert panels**, for example through expansion of the number of ITAP members, or by focusing on recruiting candidates with both sector and gender/social expertise. The relative neglect of gender-specific assessment by the ITAP also means that up to now the lack of sufficient gender analysis or a missing project-specific gender action plan have not resulted in a conditional approval stipulating that those shortcomings are to be remedied prior to project finance disbursement, although hopefully this is changing. GCF project FP042 in Morocco, approved by the Board in April 2017, is the first one where the submission of a comprehensive gender analysis and a project gender action plan to the satisfaction of the Secretariat was made a condition for finance release. This actually should become the norm, not the outlier. Relatedly, **the GCF GP in its revised version should make very clear that the GCF will not fund any project/programme without sufficient gender consideration and integration** (as, for example, the recent Adaptation Fund gender policy states).

Strengthening gender-related country-level accountability:

With country ownership a core principle of the Fund's engagement with eligible developing countries, those countries' National Designated Authorities (NDAs) and focal points (FPs) play an important role in the GCF process, and consequently for the full implementation of the GCF GP/GAP and the success of GCF gender mainstreaming efforts. They do this particularly through functions that they are supposed to fulfill with respect to country coordination and stakeholder engagement. The **development of relevant guidance and guidelines for best practice gender-responsive country coordination and stakeholder consultation efforts** in the engagement of NDAs/FPs with the GCF should be one priority action under the updated GAP. Current country ownership guidance and guidelines are weak, and largely miss the opportunity to provide clarity on how to ensure that women and men participate equally in determining a country's funding priorities for engagement with the GCF. Under the GCF readiness support program, NDAs/FPs can receive financial support for such coordination and outreach activities.

Detailed guidance should encourage NDAs/FPs to **identify and reach out to national women's machineries (such as the government agencies and offices charged with national commitments to implement CEDAW) as well as national and local women's organizations and networks as part of a wider engagement of civil society**. Such gender-inclusive outreach is crucial, as the NDAs/FPs are also **charged with the development of GCF country programmes** which are to detail national funding priorities and their alignment with national climate plans and development strategies and form the basis for engagement with AEs for concrete project development. In order for these **country programmes to be gender-informed**, national level gender expertise has to be brought in, as does the experience of women at the grassroots and local levels, who are directly affected by climate change and often leading the local response to address its challenges. Representatives from national women's machineries as well as women's groups including indigenous women and gender experts should also be included in the **regional structured dialogues hosted by the GCF Secretariat**, which serve as match-making

opportunities to bring NDAs/FPs and national-level stakeholders from several countries in the region into contact with AEs to develop a GCF project pipeline based on country programmes/country priorities.

The **setup of an effective gender-responsive outreach and communications mechanism by the NDA/FP** to notify stakeholders about GCF-related reports and activities that are taking place at the national and regional level in a timely manner is crucial to ensure true country-ownership. This would involve for example the timely notification about upcoming projects for which the NDA/FP has to issue a letter-of-no-objection to hear if there are stakeholder objections and concerns that would prohibit or should delay such a letter being issued.

Such communication and outreach efforts must be gender-equitable and proactive, especially by encouraging and supporting the active participation of CSO organisations, particularly those focused on women's rights as well as from local women's grassroots groups and including indigenous women. GCF readiness funding for NDAs/FPs could for example be used for a **mapping or census exercise to identify gender agencies and women's groups that should be involved in the development, implementation, monitoring, and reporting of projects and activities, at the national and sub-national levels**. NDAs could be encouraged to set up a database of relevant women's groups in their country. For this, NDAs could link up, as an example, with existing national and regional women's funds, who have a clear overview of the women's groups that are active at the national and local level.

(b) Management response: What type of GCF management-related recommendations can the review recommend and what type of pursuant actions need to be considered in the updated Gender Policy and Action Plan?

The GCF GP must be implemented throughout the Fund's administrative and operational processes. Both, the **Board and the Secretariat through their respective roles and interactions share responsibility** and must be held to account for how well the GCF GP/GAP are implemented and the GCF mandate for gender-responsiveness in all its actions is achieved.

The Role of the Board

The role of **the Board** in the current GP/GAP is highlighted as that of final arbiter on how well the GCF does in implementing its gender mandate and the GP/GAP through regular reporting by the Secretariat to the Board on progress. This is however a **very narrow reflection of the role the GCF Board should play and should be expanded in an updated GP/GAP**. In order to ensure that draft policies and project/programme proposals brought by the Secretariat to the Board for its consideration and approval are sufficiently gender-responsive, the Board's own capacity on gender issues and gender mainstreaming needs to be enhanced, including through **learning events for the Board or targeted information sessions**. A commitment to such knowledge-sharing with the Board should be part of the updated GCF GAP. The **composition of relevant Board Committees and Groups**, including the Investment Committee, the Accreditation Committee, the Risk Management

Committee, and the Budget Committee, should include Board members with relevant gender and social competencies.

The Board could also consider the **creation of a formal Gender Advisory Group**, bringing together Board members, experts from developing and developed countries and observers, including civil society observers representing women's groups and networks. Such an advisory group could be modeled after the existing Private Sector Advisory Group (PSAG) and like in the case of the PSAG would highlight the priority attention that the Board and the Fund convey to have the concerns of this particular stakeholder group given Board and technical expert attention.

Lastly, in its own composition the Board and its member country constituencies need to make **progress toward the Governing Instrument mandate of gender balance in the Board**. As of May 2017, only 4 of the 24 Board members are women (and 8 of the 24 alternate members). Regional Board member groups should ensure female Board member candidates are prioritized in rotation. Likewise, those developed countries sending both a member and alternate member to the Board (the United States, the UK, France, Germany, and Japan) should commit to being represented by one man and one woman at all times as the rule.

The Role of the Secretariat

The Secretariat needs to ensure that its own administrative and human resource policies reflect the mandate of the gender policy, for example in ensuring that **Secretariat staff in its annual performance review is held accountable for improving gender results**. Being a gender champion within the Secretariat should be a plus, for example for staff advancement or bonus pay. Likewise the mandate for gender equality and giving men and women equal opportunities must be reflected in **human resource policies in hiring, compensation, and in the procurement of contractors**.

According to the Governing Instrument, Secretariat staff has to strive toward regional and gender balance. While with the expansion of the Secretariat the percentage of female staff members has increased and is nominally approaching balance, female staff remains underrepresented in the professional level international positions and overrepresented in the administrative support function. Thus, with many professional international positions in an expanding Secretariat yet to be filled, **active head-hunting for female talent, especially from developing countries**, should be pursued.

The current GCF GAP had specified the **hiring of a senior social development and gender specialist**. While the fact that this position was quickly filled is welcome, it is also clear that it is **impossible for one dedicated gender specialist to ensure that gender considerations are effectively mainstreamed across the different GCF Secretariat divisions and policies**. With the assignment of the existing position under the country programming division (responsible for accreditation, readiness and engagement with NDAs/FP), at a bare **minimum a corresponding position under the Mitigation/Adaptation Project Division** should be created under the updated GAP to better help in engaging with implementing entities to improve gender integration and provide gender capacity support during project development from concept stage to project proposal submission and then throughout project management.

Additionally, the Fund management should **prioritize the hiring of Secretariat with gender and social expertise as added qualification to specific sector expertise**. Such “gender + sector” expertise would be particularly important for private sector engagement experts or Secretariat experts dealing with REDD+, agriculture, and the land sector more broadly and in leadership positions (for example for the director of a Secretariat division). Ultimately, the commitment to gender equality and the protection of women’s human rights must be shared by all GCF Secretariat staff members. Thus, **initial and refresher in-depth gender mainstreaming capacity building and training sessions should be mandatory for all GCF staff**, in particular for new hires and professional staff.

Even with an expanding number of staff, the Secretariat will be reliant on outside gender and social expertise to supplement its internal capacity. Thus, one action under the updated GAP should be to **develop a roster of gender and social experts** who can be on call to provide gender and sector-specific expertise and regional or national support to all GCF entities, for example capacity-building support to NDAs and FPs, gender analytic support to implementing entities, support in proposal reviews for the ITAP or for accreditation reviews for the AP. Such a roster should focus on the inclusion of expertise from developing countries, including engagement on the grassroots and local levels.

Following the example of the GEF, which established a Gender Partnership as an inter-agency working group involving all of its partners under its own gender equality action plan (GEAP), the Secretariat could also consider setting up a similar **inter-agency coordination and exchange mechanism on gender**. It should involve all GCF partners, including representatives from different divisions of the GCF Secretariat, NDAs, AEs, other support providers (for readiness), as well as observers and including civil society as a way to facilitate communication and coordination on implementation of the GCF gender mandates.

The Secretariat should greatly **expand development of gender-informed guidance documents** for various operational policies and processes. While the GCF Secretariat, in collaboration with UN Women, has recently published a guidebook on *Mainstreaming Gender Considerations in Climate Change Projects*¹¹, this document misses some specificity and contextualization related to the GCF templates and procedures related to project proposal development, submission, due diligence review, and Board consideration. Many AEs and GCF partners need more concrete guidance, maybe using some real practice examples from actual GCF projects -- in an effort to support peer-to-peer-learning. Some **sector-specific guidance material** could be extremely helpful, for example regarding the engagement of private sector actors or related to results-based payment approaches as those pursued through REDD+ projects.

One concrete example for the need for better integration of gender considerations in developing Secretariat guidance is the case of current guidance provided on ESSs, for example through GCF readiness support providers.¹² As the GCF is currently in the process of developing missing elements

¹¹ Available at: <http://www.greenclimate.fund/documents/20182/194568/LEVERAGING+CO-BENEFITS+BETWEEN+GENDER+EQUALITY+AND+CLIMATE+ACTION.pdf/95dd0426-6d58-4413-bbbc-45e4d6c7e7d5>

¹² Available at: <http://www.gcfreadinessprogramme.org/sites/default/files/Environmental%20and%20Social%20Safeguards%20at%20the%20Green%20Climate%20Fund.pdf>.

of its Environmental and Social Management System (ESMS), including an Environmental and Social Policy (ESP) and its eventual development of its own ESSs (instead of using the IFC performance standards as it is doing in the interim), relevant guidance to be elaborated by the Secretariat for AEs and GCF partners will need to clarify the **need for gender-responsive actions at each stage of ESMS operations**. Explicit gender-responsive language regarding required steps for ensuring gender equity, use of gender disaggregated data, etc. is needed in all elements and policy articulations of the ESMS (in all phrases and paragraphs) requiring actions (including related to project design, consultation, participation, implementation, monitoring, response to harm, assessment, etc.) Relevant guidance documents must detail that each action must be taken also with respect to gender, gender issues, using gender-disaggregated data, and in a gender-responsive manner that promotes gender equality and women's empowerment. The ADB's safeguard elaboration on involuntary resettlement, for instance provides some good practice examples.¹³ Without such explicit requirement, those responsible for implementing or monitoring safeguards or responding to safeguard violations are unlikely to take the steps necessary to ensure that women and men benefit equally from GCF projects and are not harmed by them.

Gender-mainstreaming and gender-capacity building and learning events are an important way that the GCF Secretariat can further the implementation of the GCF GP/GAP. Activities already happening under the readiness support programme should be expanded and related activities should be made more inclusive by bringing in representatives from national women's machineries and in particular more civil society actors, including women from the grassroots level and indigenous women, with local experience and local/traditional knowledge.

The Secretariat's and Fund's external communication and the GCF website should highlight, in a much stronger way than it currently does, the Fund's commitment on gender equality and gender-mainstreaming efforts and articulate that ensuring gender-responsiveness in all its funding actions is seen by the GCF as an integral part of the paradigm shift and transformative change that it wants to support in recipient developing countries. As an action item under an updated GCF GAP, the **development of a GCF gender webpage with technical resources, tools, and relevant guidance documents, but also documenting lessons learned and showcasing best practice examples** of gender-responsiveness in implementation from among the GCF family should be encouraged.

¹³ At the ADB gender-related requirements are placed in most of the detailed ADB safeguard requirements, meaning that, in theory, at every step, gender issues must be addressed. The examples below from the ADB's Involuntary Resettlement safeguard may be instructive. (Similar language is found in ADB Environment and Indigenous Peoples' safeguards). ADB Involuntary Resettlement policy principles for example state: *"1. Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of displaced persons, including a gender analysis, specifically related to resettlement impacts and risks. 2. Pay particular attention to the needs of vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and Indigenous Peoples, and those without legal title to land, and ensure their participation in consultations. ... 5. Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards. In rural areas provide them with legal and affordable access to land and resources, and in urban areas provide them with appropriate income sources and legal and affordable access to adequate housing."* [emphasis added].

Likewise, the GCF's **external communication strategy** should ensure that **GCF senior management**, starting with the Executive Director, prominently discuss the commitment to gender-responsiveness of all Fund actions in their outreach and advocacy efforts, and not just at gender conferences or at "gender days", but mainstreamed into broader technical climate change and finance discourse in all international and national appearances. This responsibility is shared by **GCF Board Members, with a particular role for the GCF Board Co-Chairs.**

I(c) Engendering climate change: What are some principles of gender mainstreaming that could be integrated into the GCF and in the delivery of climate change results in programmes/projects?

The GCF Governing Instrument places all climate actions by the Fund "in the context of sustainable development". Thus, in looking at engendering climate change and in delivering gender-responsive climate change results in GCF projects/programmes, the Fund needs to be mindful and cognizant of this much broader context, for example by drawing on discourses and work (including for indicators) done with respect to the 2030 Sustainable Development Goals (SDGs).

Gender bias and social exclusion reduce women's access to resources and their public voice in decision-making. Climate shocks exacerbate women's vulnerability. This results in gender differences in outcomes. Women are also over-represented in natural resource-based occupations such as agriculture, with consequences for livelihoods. Engendering climate change thus goes beyond a narrow understanding of how to reduce emissions or build resilience. At the programming level, it should focus on how its support for climate actions for example addresses **food security** (in line with SDG Goal 2); **health, including sexual and reproductive health** (in line with SDG Goal 3); **gender-based violence** (in line with SDG Goal 5); **access to clean water and sanitation** (in line with Goal 6); **access to energy and clean cooking solutions** (in line with Goal 7), and the **full and effective participation of women** -- focusing particularly on the inclusion of grassroots women groups and gender and human rights groups --**throughout the project/programme cycle, and gender budgeting.**

Given that the discriminations and inequalities that women are facing are **multi-dimensional** (social, cultural, economic, political, and legal) and **intersectional** (often compounded by age, race, religion, and class) **effective gender-responsive climate change actions financed by the GCF must focus on addressing multiple challenges and providing multiple benefits.**

Of course, gender mainstreaming priority results areas are very project-specific and should be elaborated as the result of a comprehensive gender analysis with gender-disaggregated baseline data on a project-by-project basis. Nevertheless, some **recurring priority issue areas for gender mainstreaming in climate actions** can be identified.

While the following is not an exhaustive list, engendering climate change thus means, for example, that the following concerns need to be recognized and addressed in GCF-funded mitigation and adaptation projects, including through mandatory collection and analysis of gender-disaggregated data:

- **Access to resources and services:** the requirements that projects/programmes establish procedures to ensure that women have access and/or control of necessary resources for their livelihoods such as water, forests and lands and that their access to productive assets and services, including energy services, is increased.
- **Income:** the requirement that projects/programmes ensure an increase in women's income and livelihood status as well as access to financial resources and credit, and that they prevent any degradation/decrease in income or livelihood as a result of project/programme impacts; gender-disaggregated assessments of economic impact of projects/programmes on women with careful attention to informal sector economic activities and activities dependent on location of housing and community networks should be provided.
- **Providing opportunities:** the requirement that projects/programmes should contribute to narrowing opportunity and outcome gaps between males and females and provide women with employment and job opportunities; projects/programmes should look at pro-actively supporting women as professionals and business entrepreneurs in providing clean energy and climate adaptation services.
- **Climate-induced displacement and migration:** the requirement that projects/programmes analyze and address the gender differences among environmental refugees as women, adolescents, and young girls are the most vulnerable when facing different climate phenomena.
- **Land rights:** the requirement that women's landholdings and land and forest use are clearly documented prior to project/programme design, are protected during project/programme design, implementation, and assessment and that there is no loss of land or forest or loss of access to land or forest by women. Instead, projects/programmes should support women's improved tenure security and forest resource use.
- **Gender-based violence:** the requirement that mandatory steps to prevent gender-based violence often associated with the presence of security forces to "protect" projects/programmes are taken. In post-climate chaos environments, women are at risk of sexual violence and rape.
- **Gendered focus on health and well-being:** the requirement that mandatory steps be taken to provide information and services on sexual and reproductive health to prevent sexually transmitted infections (STIs), including HIV and AIDS, which is associated with the presence of largely male labor forces and security forces associated with construction/infrastructure projects/programmes. As such awareness and educational programmes, support, and referral services should be made accessible, available, and at no cost to women and girls who are at risk of STIs. Additionally, beyond women's mortality rate and vulnerability to disease, the physical and mental well being of women also need to be taken into account and post-trauma mechanisms should be available.

(d) Key priority/results areas: What type of gender-informed key priority and results areas should the review of the existing Gender Policy and Action Plan consider at both the institutional and programming levels?

In order to make substantial progress with gender mainstreaming in all GCF-funded actions and in the engagement with the Fund by all relevant internal and external actors (including the GCF Board, the Secretariat with top management, the Accredited Entities and their executing partners, readiness support implementation partners, National Designated Authorities/Focal Points, observers, and in-country stakeholders), a few key priority and results areas stand out. The following, *inter alia*, provides a short overview of some of these key areas.

Full and effective participation of women: Probably the most important single results area -- which involves a comprehensive set of necessary actions and priority activities -- is to **focus on the full and effective participation of women in all aspects of the Fund's operations**. This includes amplifying women's voices as observers and input providers in GCF Board decision-making on operational policies and in mandatory policy reviews and the elaboration by the GCF Secretariat of those draft policies and guidance documents. It most fundamentally has to focus on including grassroots civil society organizations, especially women's groups, gender and human rights groups, and indigenous women as those most vulnerable to and affected by climate change throughout the project/programme cycle in recipient countries (to be further elaborated under question (g)).

Full and effective participation cannot be limited to proof that a consultation has happened or to counting attendance, but means a prioritized focus on increasing women's **agency and decision-making power**. While this is important at any level, it must be especially enforced by empowering local women's role in adaptation, transport, land-use, and energy-related decision-making processes throughout the GCF project/programme cycle.

Early and improved access to information: An important corollary is improved and early **access to information for local stakeholders, in particular grassroots and indigenous women**. The early and comprehensive disclosure via gender-responsive approaches of project/programme proposal related information for early consultations on project design with communities (for example at the pre- or concept stage), for NDAs' no-objection- letter and for timely feedback before Board consideration and approval is a key example. Such information provision and consultations need to take place through communications means and in places that are easily accessible by the women of the communities, and in languages that are understood by them. **Here the Secretariat, the Board, the AEs, and NDAs/FPs are equally responsible to ensure that this happens as a high priority focus.**

Participatory monitoring: Early and comprehensive access to information in turn is the requirement for **successful participatory monitoring by local women stakeholders, in particular grassroots and indigenous women**. Enshrined as a mandated approach under the GCF Monitoring and Accountability Framework, its current definition and application as an annual stakeholder forum organized at the national level by the NDA/FP needs to be significantly expanded. Participatory monitoring means for example also **involving local stakeholder women in elaborating project-specific performance indicators**. Grassroots and indigenous women who are supposed to benefit from GCF project/programme implementation should have a say in what they would see as indication of success. Likewise, in giving them a say in defining appropriate indicators, they can actively contribute to monitoring such indicators

in their respective communities and thus **provide “red flag early warning”** to the AE and the Secretariat if the local execution of project/programmes goes awry and to prevent significant environmental and social harm from occurring in the first place.

Gender budgeting and gender financial audits/financial accountability: In most cases, proponents of GCF project/programme proposals perform the mandatory initial gender assessment and might even articulate priority measures in a project/programme specific gender action plan (which is not required but encouraged by the GCF Secretariat). However, such **mainstreaming measures are rarely fully costed and integrated in the overall project/programme budget**. In general, a **gender-responsive budgeting approach for GCF projects/programmes is missing** as that would require an analysis of the budget’s differing impacts on men and women and allocating money accordingly, including by setting targets in a project/programme gender action plan and directing funds to meet them. At the moment, AEs do not account for and report to the Secretariat the amount of GCF funding for projects/programmes that supports target actions in support of gender equality and women’s empowerment. Such **gender financial reporting should be included as part of AEs regular monitoring and reporting requirements**. Correspondingly, without relevant AE reporting, there is no accounting, and thus **no accountability for how much of the overall GCF portfolio funding is supportive of gender mainstreaming goals**. Ultimately, as **part of the regular GCF financial audit process, gender financial audits should be performed**. The GAP should **set minimum gender financial targets for the GCF portfolio, to be progressively raised**.

Resource allocation and accessibility: the GCF GP/GAP allows currently for **targeted funding support for women’s climate action** if deemed necessary to correct existing discriminations and inequalities and suggests that projects/programmes with well-designed gender mainstreaming elements might be looked on favorably in project/programme assessment and Board consideration. However, this has so far has mostly not been the case. On the contrary, two adaptation project proposals focused specifically on addressing gender vulnerabilities (one proposed by UNDP in Bangladesh at the 15th GCF Board meeting and one proposed by UNDP in Ethiopia at the 16th) did not find the support of the Board with a number of developed Board members arguing that those proposals were **too development oriented. Such an argumentation is detrimental to women’s climate change needs**. As poor women’s vulnerability to climate change is often made worse by their low economic development status, addressing the social support systems of the poorest women affected by climate change is a core adaptation measure and needs to be supported by the Fund.

A gender bonus for project/programme proposal consideration should for example **apply in scorecard approaches** where extra percentage points could be added for project/programme proposals with thorough gender mainstreaming efforts. The GCF Secretariat uses such scorecards for special requests-for-proposals (RFPs), where only concept notes with a minimum percentage score are invited to be developed into full proposals for GCF funding. Correspondingly, as is the practice in the Adaptation Fund, **project/programme proposals without sufficiently articulated gender components should not be considered for funding until improvements have been made**. Targeted funding support could also come in the form of a **GCF dedicated funding mechanism in support of women’s climate actions**. Some best practice examples for such set-aside funding in climate funds exist, for example in form of the Forest Investment Program’s (FIP) Dedicated Grant Mechanism for Indigenous Peoples and Local

Communities¹⁴. An updated GCF GP/GAP should strengthen the commitment to targeted funding support for women's climate action with a focus on grassroots and indigenous women and **consider the establishment of a dedicated funding support for this purpose, ideally in the form of a small grant facility.**

(e) Scope and principles of the updated Gender Policy

The GCF GP is based on core principles. This principles-based approach should be maintained. However it might be necessary to adjust the scope and principles of the GCF GP in an update to reflect not only some early learning, but also some initial weaknesses of the policy as adopted (which civil society in the lead-up and during the 9th GCF Board meeting highlighted, including in its intervention and outreach to the Board¹⁵).

In the following, *inter alia*, some specific recommendations for strengthening/improving the GCF Gender Policy are proposed. These should be seen as a first step of non-exhaustive input into what we hope will be further participatory discussion with the Secretariat on updating the GP that involves CSO observers and gender and climate change experts. (Some preliminary textual edits by CSOs to the current language of the existing GP are suggested in Annex I. CSOs would welcome the opportunity to discuss and engage with the Secretariat further on the specific language updates of the GCF GP):

- **Non-regression:** the updated policy should include a non-regression principle (a prohibition to go back on the protection achieved; norms which have already been adopted cannot be revised in a way that weakens them).
- **Strengthening of the human/women's rights framing:** The GCF Gender Policy must be human-rights based. As such, the policy should state very clearly that it is implemented in all GCF funding actions in accordance with international agreements on human rights, such as the Universal Declaration of Human Rights and the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) and core conventions of the International Labour Organization (ILO). It should also reference the Paris Agreement's commitment to human rights and gender equality, as the GCF serves as an operating entity of the financial mechanism of the Paris Agreement.
- **Evolving from gender-sensitivity to gender-responsiveness:** language in the GCF GP should be updated to reflect a clear commitment to gender-responsiveness as best practice standard (from the weaker language on gender-sensitivity). This is also necessary to bring the GCF as an operating entity of the financial mechanism of the UNFCCC and of the Paris Agreement in line with language used in UNFCCC decision 18/CP.20 and the Paris Agreement (see in particular Article 7 and Article 11).

¹⁴ For more information, see <http://www.dgmglobal.org/>.

¹⁵ See for example detailed commentary and textual edits provided by the Heinrich Böll Stiftung North America; available at: https://us.boell.org/sites/default/files/uploads/2014/10/boellfoundation_commentary_gcf_bm9_and_gender.pdf.

- **Increase the focus on women’s agency:** Throughout the GP, specifically in its Rationale and Objectives and Commitment sections, the update should better balance a focus on the vulnerability of women with a focus on increasing women’s agency to address climate change as consumers, community leaders, resource managers, and entrepreneurs. This is, for example, crucial for the measurement of outcomes and impacts of Fund activities (in the Commitment section), which currently only focuses on resilience building.
- **Clarify that international commitments as ratified by nations supersede national policies in GP implementation:** While country ownership is a core principle and should be maintained in an updated policy, there should be more clarity of the procedures to be followed. For example, what the GCF will do and how the GP will be complied with when national policies and/or NDAs do not align with the GCF gender policy as well as how the different national realities are going to be considered in the scope and coverage on the GP.
- **Address both allocation and accessibility of resources:** The current language indicating the possibility of targeted allocation of GCF funding in support of women’s climate change actions should be strengthened with a commitment to also address and improve the access of women’s groups to such funding. This will help to ensure funds are allocated for women’s issues and concerns. It can also enable women’s stand alone projects.

(f) Outline and content of the updated Gender Action Plan.

CSO responses to questions (a), (b), and (d) have already highlighted a number of recommended actions to be addressed in the updated GCF GAP. Thus, in this section, we focus only on some additional considerations for strengthening/improving the GCF Gender Action Plan.

These should be seen as a first step and non-exhaustive input into what we hope will be a further participatory discussion with the Secretariat on updating the GAP, which should involve CSO gender and climate change experts. (Some preliminary textual edits by CSOs to the current language of the existing GAP are suggested in Annex II. CSO would welcome the opportunity to discuss and engage with the Secretariat further on the specific language and content updates to the GCF GAP).

First, the purpose of a gender action plan is to provide a time-bound accountability tool for the GCF on concrete actions, steps, and measures that should be taken in order to achieve progress in the Fund-wide implementation of the GP. The current GAP for 2015-2017 as decided by the Board at its 9th Board meeting falls way short of this goal. Although the draft gender action plan included a table overview outlining specific actions, responsibilities, time-lines, and indicative indicators on their accomplishment¹⁶, the Board in March 2015 decided to approve the GCF GAP without such an articulated workplan. This needs to be urgently remedied in an update and is a required and necessary upgrade. A GCF GAP needs a

¹⁶ See Annex IV of GCF Board document GCF/B.09/10. Available at: http://www.greenclimate.fund/documents/20182/24949/GCF_B.09_10_-_Gender_Policy_and_Action_Plan.pdf/fb4d0d6c-3e78-4111-a01a-e5488f9ed167.

list of actions correlated with relevant time-lines, responsible actors, indicators, and budget lines and staff requirements in order to be both credible and actionable.

Such an upgraded GAP needs to have its **own results and performance measurement log-frame with qualitative and quantitative results and performance indicators and articulating concrete staffing and budgetary requirements** for its implementation. It should identify concrete actions and key entry points -- building on an evaluation of progress in GCF gender mainstreaming achieved to date -- throughout Fund activities and **covering all Fund partners, thus including specific responsibilities for Board, Secretariat, AEs, readiness implementation partners, NDAs/FP**, and a wider set of in-country stakeholders and international counterparts respectively.

The GAP should not be handled as a static document, valid for three years (presumably 2017-2020), but as a **“living document” to be updated at least yearly in conjunction with the Board’s annual work plan and through ongoing engagement with stakeholders and outside experts**, for example via a newly formed Gender Advisory Group. Thus, the GCF GP/GAP should include the explicit mandate for an **ongoing cross-checking and cross-referencing with the Board work plans as well as with other relevant operational policies and procedures to be developed or refined** during that time. For example, the GAP should include a time-bound framework for integration of language pertaining to gender requirements into various aspects of the ESMS, such as the ESP and the development of the Fund’s own ESSs as well as the articulation of detailed relevant guidance for AEs and other implementation partners.

The new updated GAP should have an expanded **section addressing resource allocation, resource accessibility, and budgeting**. It must include a clear commitment for the GCF proposal approval process (currently under Board review) to ensure that the **gender-relevant elements of a project/programme are fully funded** with guidance provided by the Secretariat to AEs on how to do **gender-budgeting for GCF proposals**. As part of the AEs regular monitoring and accounting under provisions of the GCF Monitoring & Accountability Framework, for example, AEs should indicate the **actual percentage of the project’s budget allocated to addressing specific gender elements and gender-responsive implementation** arrangements. Likewise, NDAs/FPs should disclose transparently how much of the readiness financing they receive, such as for country coordination, multi-stakeholder engagement country programme development, and project pipeline preparation is supporting efforts to improve their respective gender-responsiveness. It should also clearly elaborate that the Fund’s administrative budget must include **adequate dedicated resources for the full implementation of the gender policy** and that there will be overall **gender financial auditing** of the Fund’s activities to find out on the portfolio level how much of the GCF resources are actually contributing to enhancing gender equality and women’s empowerment through GCF-funded climate actions.

An updated GCF GAP should also further expand commitments and planned activities under the **knowledge generation and communication section**. One concrete activity to be included would be the creation of a **web-based “knowledge hub/exchange”** to allow for gender-relevant reviews and reporting, resources and tools on processes, lessons learned, and best practices to be shared across the Fund and its partner spectrum. The GCF GAP should state a **commitment to contribute to research and knowledge generation** and what transformative and paradigm-shifting gender-responsive climate action

looks like. For example, this could include some analytical work on large-scale renewable energy infrastructure, and its gender impacts or research, possible as a joint work program with the UNFCCC's technology mechanism, the **Climate Technology Centre & Network (CTCN)**, into what type of energy technologies and projects are supportive of gender and social inclusion and how this fit into the GCF's current impact areas for mitigation and its performance measurement framework with gender-disaggregated indicators. Also, the GCF GAP should focus on contributing to **knowledge generation on how the fulfillment of GP requirements can be assured in GCF equity investments, such as fund-of-fund approaches**, through work with public and private sector financial intermediaries, which account for the largest GCF financial commitments and which dwarf traditional public sector project approaches.

Finally, part of the commitments and actions outlined in an updated GAP under knowledge generation and communication should be **an iterative engagement with stakeholders, in particular women from grassroots civil society organizations, gender and women's rights groups, and representatives of indigenous groups**, through joint events and learning and exchange sessions. It is not enough to ask for public input in the form of submissions at the end of a review period only. **Grassroots and indigenous women's traditional and specific knowledge**, experiences, and capacities on addressing local climate change impacts and drivers need to be considered in GCF actions. Lastly, as intended beneficiaries of the implementation of GCF-funded climate investments, a continuous and regular check-back with civil society and community stakeholders provides a **participatory monitoring approach to whether the GCF GP/GAP is on track and achieving the desired results**.

(g) Entry points for engagement and participation of women and men of all ages from most vulnerable communities.

CSO responses to questions (a) and (d) have already highlighted a number of entry points and recommended actions to improve the engagement and participation of men and women of all ages from the most marginalised and vulnerable communities in GCF funding actions. Thus, in this section here, we highlight only some additional considerations to ensure that marginalised and vulnerable individuals and communities benefit equally from GCF projects and programmes.

In the recipient countries, the NDAs/FPs and AEs have the main responsibility for ensuring inclusive engagement of those most marginalised and vulnerable individuals and communities in national-level planning processes and throughout the project/programme cycle as well as gender-equitable benefit-sharing of GCF-supported outputs and outcomes with communities most affected by climate change impacts. Some potential entry points include:

- **Early, comprehensive, and meaningful multi-stakeholder engagement in national level planning processes** that focuses on involving men and women from grassroots and community-based organizations with a specific focus on the **inclusion and pro-active outreach to local community women and indigenous women**. This is relevant for NDAs/FPs as part of their country coordination efforts for the development of GCF country programmes as well as for AEs in project design and early project development phases.

- NDAs/FPs should use part of the GCF's readiness and preparatory support for their country to **build the capacity of local CSOs that focus on local women, communities, and women's rights to engage at every level of decision-making on climate projects/programmes**, such as in interactions with the NDA, the AEs, and executing entities and advocating for their needs and rights with the GCF Board.
- **Gender-responsive assessments of both the needs and capabilities of women and men from the most marginalized and vulnerable communities** that are supposed to benefit from proposed projects/programmes are needed. Such assessments, which should also **take into account traditional and local knowledge**, should be undertaken and GCF-supported interventions should reflect the results of such local community needs and capabilities assessments. It may be necessary to ground truth the consultations and needs assessment done by the project/programme proponents with local stakeholders from vulnerable communities. This should be done through GCF CSO observer organizations to avoid objections to the project on the ground of missing consultations with proposed beneficiaries, or the absence of **free, prior and informed consent (FPIC)** as is required for indigenous communities and which **should be the best practice standard for engagement with all, particularly marginalised and vulnerable individuals and communities**.
- **Focus on gender-responsive social mobilization and institutional development through enhancing the agency/leadership role of local women in local resource governance**, such as water user organizations or local cooperatives. As recent experience with some GCF adaptation water infrastructure projects has highlighted, in order for such projects to provide guaranteed benefits for the most marginalized and vulnerable women and men **affordability and accessibility as well as multiple-use of resources** such as land or water to include household use need to be taken into account.
- **Clear articulation of project/programme benefits for the most vulnerable men and women from climate change affected communities**. To ensure that the most marginalised and vulnerable individuals and communities receive benefits from the GCF's projects/programmes, those should include **clear gender targets in employment, training, and governance; quotas or reservations for grants to women and/or female-headed households** for local adaptation activities; **targeted awareness and outreach campaigns** including demand-side management; **development of women's leadership, skill, and mobility opportunities**; or **identifying potential benefits for women's economic opportunities and leadership**.
- **Increased access to GCF projects/programme funding for the most vulnerable communities, for example as beneficiaries of national small grant approaches under the Enhanced Direct Access Pilot Programme**. Local women's groups, including women's cooperatives, should also be considered as **possible partners of AEs in project/programme implementation, for example as Executing Entities for certain project/programme (sub-)components**. Such engagement should become the norm, not the exception. It would be strengthened if GCF project/programme implementation would be **guided by the principle of subsidiarity**, namely the notion that GCF funding should be implemented through **the most local executing entity possible**.

(h) Human and financial resource requirements and roles and responsibilities in operationalizing the updated Gender Policy and Action Plan.

Operationalizing the updated GCF GP/GAP is the responsibility of all GCF institutions and partners, in particular that of the GCF Secretariat, the AEs, and the NDAs/FPs as articulated elsewhere in this submission already in some detail. GCF observer organizations, especially **CSO observer organizations, also play a key role in advocating on behalf of local women’s groups and by giving voice to the concerns of grassroots women in GCF proceedings and policy development** as well as in sharing information about the GCF with women’s groups and building their capacity to engage on GCF-related matters, for example in interactions with the NDA/FP or project/programme proponent.

The Secretariat has a core role in coordinating the efforts of all GCF institutional partners to operationalize the updated GP/GAP. Therefore, it is essential that both the GCF administrative budget managed by the Secretariat as well the Secretariat’s staffing plan reflect the financial and human resource needs for the implementation of the GCF gender mainstreaming mandate. Within the Secretariat, this means **building the gender competency of its staff beyond the current one staff person assigned as a gender focal point** by ensuring that in hiring new staff, preference is given to candidates that have gender and social expertise on top of specialised technical expertise. Only then is it possible to provide the gender-related due diligence as part of the accreditation and proposal approval processes, to integrate gender considerations into policy documents and operational guidelines, or to engage with NDAs/FPs to enhance their gender awareness and the gender-responsiveness of country programmes and readiness and preparatory support activities.

The need to **build their own gender competency, and not to rely on the ability to outsource it**, for example by engaging external gender experts as consultants, is also fundamental for the engagement of AEs in the gender mainstreaming of GCF-funded climate actions. AE project/programme teams need to have the **gender capacity to supervise and guide concrete gender actions implemented by executive entities**. For financial intermediaries working with the GCF, an in-house gender specialist must become as important as an in-house financing expert. **NDAs/FPs should actively reach out to women’s machineries in their own country as part of their country coordination efforts** and to domestic and local gender experts and women’s groups as part of their wider stakeholder outreach and engagement. They can support those activities through GCF readiness and preparatory support financing.

While those gender-capacity-building efforts and gender-mainstreaming actions mandated in an updated GP/GAP will not be without initial costs, they should pay for themselves in the form of **better implemented, more effective, and sustainable GCF projects and programmes with multiple benefits that equally benefit both men and women in GCF recipient countries.**

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This submission was written by the Heinrich Böll Stiftung North America based on inputs provided by the following civil society organizations (CSOs) in support of this submission (in alphabetical order):

- Aksi! for gender, social and ecological justice, Indonesia
- Asian-Pacific Resource and Research Centre for Women (Arrow), Malaysia
- Asia Pacific Forum on Women, Law and Development (APWLD), Thailand
- Church World Service, United States
- Center for International Environmental Law (CIEL), United States
- Centre for 21st Century Issues, Nigeria
- Fondo Centroamericano de Mujeres (FCAM), Nicaragua
- Global Alliance for Green and Gender Action (GAGGA), Nicaragua/The Netherlands
- Global Forest Coalition, Paraguay
- Heinrich Böll Stiftung North America
- Hivos International/Energia, The Netherlands
- Ulu Foundation, United States

Additionally, the following civil society organizations (CSOs) have signed on in support of this submission (in alphabetical order):

- Asian Indigenous Women Network, Asia
- Asian Peoples Movement on Debt and Development (APMDD), Philippines
- Association du développement et de la promotion des droits de l'homme, Mauritania
- Both ENDS, the Netherlands
- Bretton Woods Project, United Kingdom
- Center of Indigenous Cultures of Peru (CHIRAPAQ), Peru
- Chinn Human Rights Organization, Myanmar
- Diverse Voices and Action for Equality, Fiji
- Friends of the Earth US, United States
- Forest Peoples Programme, United States
- Fundación M'Biguá, Argentina
- Gender and Development for Cambodia, Thailand
- Germanwatch, Germany
- Global Greengrants Fund (GGF), United States
- Green Development Advocates (GDA), Cameroon

- Green Community Development Association, Laos
- Highleader Association, Laos
- Human Rights Foundation Aotearoa, New Zealand
- Institute for Agriculture and Trade Policy (IATP), United States
- International-Lawyers.Org (INTLawyers), Switzerland
- International Work Group for Indigenous Affairs (IWGIA), Denmark
- Labour,Health and Human Rights Development Centre, Nigeria
- Pacific Partnerships on Gender, Climate Change and Sustainable Development (PPGCCSD), Pacific SIDS
- Pacos Trust, Malaysia
- Power Shift Malaysia, Malaysia
- Prospera International Network of Women's Funds, Canada/Mexico
- Rachna Satri (RS) ,Cambodia
- Sindh Community Foundation, Pakistan
- Solidaritas Perempuan, Indonesia
- STAR Kampuchea, Cambodia
- Support Organization for Rural Farmers (SORF), Cambodia
- Sustainable Development Foundation, Thailand
- Third World Network, Malaysia
- Transparency International-Korea
- Women Engage for a Common Future (WECF) International, Germany
- Women's Environment and Development Organization (WEDO), United States

Annex I:

CSO suggested textual edits to the GCF Gender Policy

I. Background

1. The Governing Instrument gives the Fund a clear mandate to enhance a gender sensitive approach in its processes and operations. It recognizes the importance of gender considerations in terms of impact and access to climate funding:

“3. ... The Fund will strive to maximize the impact of its funding for adaptation and mitigation, and seek a balance between the two, while promoting environmental, social, economic and development co-benefits and taking a gender-sensitive approach”.

“31. The Fund will provide simplified and improved access to funding, including direct access, basing its activities on a country-driven approach and will encourage the involvement of relevant stakeholders, including vulnerable groups and addressing gender aspects”.

2. Paragraph 71 lists women explicitly amongst the Fund’s stakeholders. Finally, the Governing Instrument calls for gender balance among members of the Board (paragraph 11) and staff of the Secretariat (paragraph 21).

3. The Fund’s gender policy is **human-rights based and complies with the principle of non-regression.**¹ It is guided by the United Nations Framework Convention on Climate Change (UNFCCC), which refers in its Article 2 to “anthropogenic interference” – interference of both men and women – within the climate system. (Parties to the UNFCCC have adopted a number of resolutions on gender since 2001).² **It is also guided by the Paris Agreement, which in its preamble urges Parties in their climate actions to “respect, promote and consider their respective obligations on human rights, the right to health, the rights of indigenous peoples, local communities, migrants, children, persons with disabilities and people in vulnerable situations and the right to development, as well as gender equality, empowerment of women and intergenerational equity.”**³ The Fund’s gender policy is congruent with international agreements, in particular with the Universal Declaration of Human Rights, the Convention on the Elimination of All Forms of Discrimination against Women,⁴ the

¹ **The Principle of Non-Regression is an International Law Principle known by Human Rights specialists requiring that norms which have already been adopted by States not be revised, if this implies going backwards on the subject of standards of protection of collective and individual rights.**

² Women’s Environment & Development Organization and the Global Gender and Climate Alliance, “Gender equality and the United Nations Framework Convention on Climate Change: A compilation of decision text”. Available from <http://www.wedo.org/wp-content/uploads/united-nations-web.pdf>.

³ See < http://unfccc.int/files/essential_background/convention/application/pdf/english_paris_agreement.pdf>

⁴ See <<http://www.un.org/womenwatch/daw/cedaw/cedaw.htm>>.

Millennium Development Goals⁵ and follows up on the Sustainable Development Goals⁶, and the International Labour Organization's core conventions,⁷ in that it recognizes the equal rights of women and men to access the Fund's services in order to adapt to and mitigate against the impact of climate change in the context of sustainable development.

4. Key gender definitions are listed below:

(a) **Gender:** Refers to how societies and specific cultures assign roles and responsibilities and ascribe characteristics to men and women on the basis of their sex;

(b) **Gender equality:** As enshrined in international agreements and national constitutions, refers to equal rights, power, responsibilities and opportunities for women and men, as well as equal consideration of the interests, needs and priorities of women and men; gender equality therefore entails that society values men and women and the roles they play equally;

(c) **Gender equity:** Refers to the process of being fair to women and men. To ensure equity, measures often need to be taken to compensate for (or reduce) disparity for historical and social disadvantages that prevent women and men from otherwise operating on an equitable basis. Equity, therefore, leads to equality; and

(d) **Gender sensitivity:** Refers to the understanding of the ways in which people think about gender and the sociocultural factors underlying gender inequality, and how they might be addressed. Gender sensitivity implies a consideration of the potential contribution of women and men to societal changes as well as the methods and tools used to: promote gender equity, reduce gender disparities, and measure the impact of climate change and impacts of actions for climate change, and other development activities on men and women.

(e) **Gender responsiveness:** Refers to an approach that does not only identify gender issues or work under the "do not harm" principle, but will substantially help to overcome historical gender biases in order for women to truly engage and benefit from gender-responsive actions. It refers to the consideration of gender norms, roles and relations and to addressing inequality generated by unequal norms, roles and relations through changes within a given social setting through remedial action.

⁵ See <<http://www.un.org/millenniumgoals/bkgd.shtml>>; and United Nations Economic and Social Council, "Challenges and achievements in the implementation of the Millennium Development Goals for women and girls (E/CN.6/2014/L.7).

⁶ See <<http://sustainabledevelopment.un.org/index.php?menu=1300>>.

⁷ See <<http://ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>>.

(f) Women’s empowerment⁸: can be best understood as an expansion of agency throughout women’s lives, especially via participation and decision-making. It generally refers to differential or pro-active support to increase:

- i. women’s sense of self-worth;
- ii. women’s right to have and determine choices;
- iii. women’s right to have access to opportunities and resources;
- iv. women’s right to have power to control own lives both within and outside the home; and
- v. women’s ability to influence the direction of social change to create a more just social and economic order, nationally and internationally.

II. Rationale

5. There are three compelling reasons for the Fund’s mandate on gender sensitivity/responsiveness:

- (a) Women, as well as men significantly contribute to combating climate change. Shifting the paradigm towards low-emission and climate-resilient development pathways, which is the Fund’s mandate, requires a large number of individual and collective decisions by women and men. A gender-responsivesensitive approach is therefore part of a paradigm shift;
- (b) Climate change impacts women and men differently, to the detriment of women, and existing gender inequalities are likely to be exacerbated by climate change and actions for climate change,⁹ and
- (c) Gender inequality, exacerbated by climate change, is linked, as are other development areas, to vulnerability and risks.¹⁰ The greater vulnerability of women to climate change stems from gender norms and discrimination that result in the imbalanced division of labour, lower income, and lesser livelihood opportunities; lower education, less access and control over land and other productive assets and in decision makings; fewer

⁸ UNFPA.

⁹ GCF/B.06/13.

¹⁰ These risks include gender violence during climate-related extreme events stemming from complex social behaviours between women and men. See Emma Fulu and others, Why Do Some Men Use Violence against Women and How Can We Prevent It? Quantitative Findings from the United Nations Multi-country Study on Men and Violence in Asia and the Pacific (Bangkok, United Nations Development Programme, United Nations Population Fund, United Nations Entity for Gender Equality and the Empowerment of Women, and United Nations Volunteers, 2013).

Available from

http://www.undp.org/content/dam/rbap/docs/Research%20&%20Publications/womens_empowerment/RBAP-Gender-2013-P4P-VAW-Report.pdf

Comment [1]: It is important to highlight education of girls is also affected by climate change. During climate change, girls have to drop out of school to help with household chores (e.g., fetch water etc) and taking care of the young and elderly.

legal rights; less influence, power and autonomy in the domestic arena; lesser mobility and lesser political and professional representation.¹¹ Gender vulnerability to climate change is further exacerbated by other discriminatory factors, such as geography, poverty, age, indigenous or minority status, national or social origin, disability, etc. It is therefore crucial that the Fund's mandate on gender responsiveness integrates an intersectional approach.

III. Objectives

6. The Fund's gender policy has four main objectives:

- (a) To ensure that by adopting a gender-~~sensitive~~-responsive approach, the Fund will achieve greater, more effective, sustainable, and equitable climate change results, outcomes and impacts, in an efficient and comprehensive manner in both its internal and external procedures and activities;
- (b) To build equally women and men's resilience to, and ability and agency to address climate change, and to ensure that women and men are will equally empowered to contribute to, and benefit from activities supported by the Fund;
- (c) To recognize and address women's and men's needs and capabilities in potential projects/programmes and address and mitigate against assessed potential project/programme risks for women and men associated with adaptation and mitigation activities financed by the Fund; and,
- (d) To contribute to reducing the gender gap of climate change-exacerbated social, economic and environmental vulnerabilities and exclusions, in particular by empowering women.

IV. Principles

7. The Fund's gender policy consists of the following six elements:

4.1 Commitment

- 8. By adopting a gender-~~sensitive~~-responsive approach in its mandate on climate change, the Fund commits to contributing to gender equality, as enshrined in international agreements and national constitutions, and other human rights agreements.¹²
- 9. The Fund thereby also commits to:

Comment [2]: with positive action applying the principle of "due diligence"

¹¹ GCF/B.06/13.

¹² This approach takes into account equal rights, power, responsibilities and opportunities for women and men, as well as equal consideration of the interests, needs and priorities of women and men.

- (a) Understand the sociocultural factors underlying climate change-exacerbated gender inequality, and the potential contribution of women and men to societal changes in order to build resilience to, and the ability to address, climate change;
- (b) Adopt methods and tools to promote gender equality and reduce gender disparities in its climate funding, including by updating the ESMF to include specific gender requirements for all actionable steps; and
- (c) Measure the outcomes and impacts of its activities on women and men's resilience to and ability to address climate change by, among other things, specifically requiring gender-disaggregated data to be used throughout all stages of all GCF projects.¹³

4.2 Comprehensiveness, in scope and coverage

- 10. The Fund applies its gender policy to all its climate mitigation and adaptation activities, whether implemented by international, regional, national or subnational, public or private entities that are accredited to the Fund.

4.3 Accountability

- 11. The Fund accounts to its Board for gender and climate change results and outcomes, and reports annually in a transparent manner. Qualitative and quantitative gender monitoring, impact, and outcome indicators are included in the results management and performance measurement frameworks (GCF/B.08/07). Progress on gender integration results is also reported to UNFCCC parties as part of the Fund's annual report to the COP.
- 12. Through the accreditation process and taking into account the fit-for-purpose accreditation approach,¹⁴ entities will be required to meet the Fund's gender policy and gender requirements of the ESMF as a condition for accreditation. They will also be required to have policies, procedures and competencies in place with which to implement the Fund's gender policy, including the use of gender-disaggregated data throughout all GCF-supported activities. After accreditation, and at the project/programme level, the Accredited Entity will be responsible for implementing the gender policy as it relates to the Fund-approved project/programme through in-country project identification and implementation, as well as for results reporting. The application of the Fund's

¹³ Resilience to climate change to be understood as (1) the capacity to absorb stresses and maintain function in the face of external stresses imposed upon it by climate change, and (2) adapt, reorganize and evolve into more sustainable socioeconomic behaviors, leading people to be better prepared for future climate change impacts". (See C. Folke, "Resilience: The emergence of a perspective for social-ecological systems analyses", *Global Environmental Change*, vol. 16 (2006) pp. 253–267; and Donald R. Nelson, W. Neil Adger and Katrina Brown, "Adaptation to environmental change: contributions of a resilience framework", *Annual Review of Environment and Resources* Vol. 32 (2007) pp. 395–419.)

¹⁴ Decision B.08/02.

guidelines on the initial socioeconomic and gender assessments and the Fund's environmental and social safeguards (ESS) as it relates to the project/programme¹⁵ is mandatory.

13. Gender-related complaints and grievances that may occur in projects and programmes are processed through the Fund's redress mechanism.

14. The Fund's management and staff are accountable for gender results, including as part of their annual performance review. All staff are expected to build their gender capacity. This is reflected in the Fund's administrative policies and procedures, including human resource management and the procurement of contractors.

4.4 Country ownership

15. The Fund informs national designated authorities (NDAs) and focal points (FPs) that proposed projects or programmes submitted to the Fund are required to be aligned with national policies and priorities on gender¹⁶ and with the Fund's gender policy, in the framework of international human and women's rights agreements.

16. The Fund requires that women and men, especially those from marginalized and vulnerable groups and communities, be provided with equal and equitable opportunity to be included in meaningful stakeholder consultations and decision-making during project and programme preparation, implementation¹⁷ and evaluation.¹⁸

Comment [3]: related international gender safeguards and

Comment [4]: direct beneficiaries and stakeholders

4.5 Competencies¹⁹

17. The Fund strives to reach gender balance in all key advisory and decision-making bodies, including in the appointments of its members of the Board and Secretariat management and staff. The Secretariat ~~also will~~ increase the number of ~~appoint a~~ senior staff member(s) with additional competencies in gender and social development; a senior gender coordinator reporting directly to the Executive Director will in order to lead the implementation of the policy; ~~the senior staff members(s) will report to the head of accreditation within the Secretariat.~~ In addition, the Secretariat strives for the relevant gender and climate change competencies to be included in the Accreditation Panel,²⁰ the Accreditation Committee, the Investment Committee, the Risk

¹⁵ GCF/B.07/03, paragraph 20.

¹⁶ Many countries have national and sector gender policies (e.g. for energy, water, forestry and climate change), but relatively few have gender and climate change policies.

¹⁷ GCF/B.07/03.

¹⁸ GCF/B.06/06.

¹⁹ Competencies are defined as a set of skills, knowledge, and behaviours acquired from training and experience, that allow individuals and organizations to perform a specific role or task.

²⁰ Annex V to decision B.07/02, Annex V, where gender is listed as an aspect within the Fund's ESS.

Management Committee and the Private Sector Advisory Group,²¹ as well as [in the Independent Technical Advisory Panel.](#)²² ~~amongst technical advisers.~~¹⁹

18. The Fund's accreditation process²³ and fit-for-purpose approach²⁴ recognize that there is a wide range of types of organizations and institutional capacities. In the accreditation process, entities will be required to have policies, procedures and competencies in place [and a clear track record of a gender-responsive approach to project/programme implementation](#) in order to implement the Fund's gender policy.

19. NDAs/FPs and entities may request readiness and preparatory support from the Fund²⁵ so as to enhance their capacity to implement the gender policy.

20. The Fund commits to knowledge generation ~~as experience is gained~~ on gender and climate change [through its actions such as the generation of relevant gender-disaggregated data and learning from best-practice implementation of its partners.](#) It also commits to capitalize on knowledge and expertise gained from other organizations. Such knowledge is to be used to strengthen the competencies of all stakeholders.

4.6 Resource allocation [and accessibility](#)

21. The Fund's resource allocation for adaptation and mitigation projects and programmes contributes to gender equality and women's empowerment. The Fund seeks to ensure that its projects and programmes support initiatives addressing the inequities^{iesy} of climate change impacts, to provide gender-[sensitive responsive](#) solutions to climate change mitigation, adaptation or readiness, [and to address any unprecedented impacts from climate actions-taken.](#) When it is necessary to correct for climate change-exacerbated gender inequities^{iesy} which affects women, the Fund will [provide targeted funding target funds](#) to support women's climate change adaptation and mitigation initiatives [and in particular, through -addressing and improving the access of women's groups to such funding. Fund projects and programmes without articulated gender considerations shall not receive Fund resources.](#)

V. Implementation framework

22. The Fund adopts a gender action plan in order to implement its gender policy. The plan includes six priority areas as follows:

²¹ GCF/B.05/13 and GCF/B.06/18, Annex I, paragraph II.

²² [GCF/B.08/21.](#)

²³ Decision B.07/02.

²⁴ Decision B.08/02.

²⁵ Decision B.05/14 para (b): "(iii) Enable implementing entities and intermediaries to meet the Fund's fiduciary principles and standards, and environmental and social safeguards, in order to directly access the Fund", and document GCF/B.06/14.

- (a) Governance and institutional structure;
- (b) Operational guidelines;
- (c) Capacity building;
- (d) Outputs, outcomes, impacts and paradigm-shift objectives used for monitoring, reporting and evaluation;
- (e) Resource allocation, [accessibility](#) and budgeting; and
- (f) Knowledge generation and communications.

23. The proposed duration of the gender action plan is three years, in order to allow the Fund to ~~get activities off the ground and then~~ assess the implementation after this three-year period. Subsequently, the duration of the gender action plan is expected to align with the Fund's business cycle.

VI. Review and revisions

The Fund is a nascent, growing and learning institution. As experience is gained and lessons are learned in the implementation of the gender policy in the Fund's activities and operational modalities – including activities with the private sector – the Fund will be able to adjust its policies, processes, procedures, and project and programme design. In the light of this, the Fund will review its gender policy after three years of being operational [through an independent impact report either provided through the Independent Evaluation Unit or a third-party](#).

Annex II:

CSO suggested textual edits to the GCF Gender Action Plan 2015–2017

1. The purpose of the gender action plan is to provide a time-bound framework within which to operationalize the gender policy and to ensure inclusion of gender-related requirements at all levels of the ESMF and project implementation. A detailed set of specific actions, responsibilities, time-lines and indicative indicators for its implementation are provided in a tabular overview in an Annex. Implementation of the gender action plan will provide the Fund and all implementation partners, public or private, with the tools and processes in order to achieve gender sensitivity-responsiveness and contribute to gender equality and women's empowerment in all areas within the Fund's mandate. It will also provide the Board with the necessary information to exercise its oversight responsibility for the Fund's gender policy as mandated by the Governing Instrument.

2. The gender action plan is a living document to be updated yearly in conjunction with the Board's and Secretariat's annual work plans. It also requires regular cross-checking and cross-referencing with other relevant operational policies and procedures to be developed or refined by the Fund during its duration. It is structured into six priority areas and details the implementation actions required for each priority area.

I. Governance and institutional structure

3. The overall implementation of the gender policy will be the responsibility of all components of the Fund's operational structure and of the national designated authorities (NDAs) with the Secretariat taking the lead. The main operational responsibility for the implementation of the gender policy will be with the Secretariat providing oversight of, guidance to and working closely with-the accredited entities (AEs), including implementing entities (IEs) and intermediaries.

4. The Board approves the gender policy and will oversee the implementation of the action plan, at least once per year, through the review of periodic monitoring reports from the Secretariat, impact evaluation reports from the Evaluation Unit and reports from the redress mechanism. The Secretariat will take responsibility undertake its due diligence for the implementation of the gender policy and process of including gender-related requirements throughout the ESMF and strive to increase the gender and social development competencies of staff in all divisions of the Secretariat. It will provide due diligence for the compliance of the GCF funded activities with the gender policy through the accreditation of IEs and intermediaries, and the project approval and monitoring process. Furthermore, it will report to the Board at least annually on the progress made towards implementing

the policy and action plan.¹ The current A-senior social development and gender specialist will be appointed within the Country Programming Division, with operational responsibility to manage the implementation of the gender policy and action plan will be aided by at least another senior social development and gender specialist within the Adaptation and Mitigation Programming Division. They will be supported by both a Board-appointed Gender Advisory Group.

5. The NDAs will verify through the no-objection procedure that project proposals are aligned with the countries' gender policies, as well as with their climate change policies and priorities and with its international women's rights obligations. The Fund will expect that the NDAs use, as appropriate, the countries' gender competencies and reach out to the countries' women's machineries in order to review their climate change plans, programmes and projects.

6. Through the accreditation process, and taking into account the fit-for-purpose accreditation approach,² entities will be required to have policies, procedures and competencies in place and a demonstrable track record of gender-responsive project/programme management in order to implement the Fund's gender policy. In case where those do not exist yet, the accreditation will be withheld until the Accredited Entity adopts relevant policies, procedures and competencies. After accreditation and at the project/programme level, the Accredited Entity will be responsible for implementing the gender policy as it relates to the Fund-approved project/programme, through in-country project identification and implementation, as well as for results reporting. Entities may request readiness and preparatory support from the Fund in order to develop and/or strengthen their policies, procedures and competencies to meet the requirements of the Fund's gender policy.

II. Operational guidelines

7. The policy will be implemented throughout the Fund's administrative³ and operational processes and the ESMF will be updated to include clear gender-related requirements, including for the collection and use of gender-disaggregated data for all aspects of a project, including assessment, planning, consultation, implementation, monitoring, reporting, correction of ESMF violations, and response to harm. Guidelines will be issued for the benefit of external partners: NDAs and AEs. The guidelines will apply to all activities, including private sector activities, and to the Fund's project/activity cycle described in document GCF/B.07/03. Core elements will include:

- (a) A mandatory initial socioeconomic and gender assessment accompanied by a fully funded project/programme-specific gender action plan, complementary to the environmental and social safeguards (ESS) process, which accredited entities AEs will be required to undertake in order to collect gender-disaggregated baseline data, and to:

Comment [LS5]: Needs to be in line with the review of the proposal approval process, currently underway

¹ The gender specialist will consider establishing a formal partnership with an advisory group of experts on gender and climate change in order to enrich the implementation of the gender policy.

² Decision B.08/02.

³ The Administrative Manual will specify the Fund's internal accountability structure and processes for gender results, including the staff's annual performance review.

- (i) Determine how the project/programme can respond to the needs of women and men in view of the specific climate change issues to be addressed;
- (ii) Identify the drivers of change and the gender dynamics in order to achieve the project/programme adaptation or mitigation goals;
- (iii) Identify and design the specific gender elements to be included in the project/programme activities;
- (iv) Estimate the implementation budgets;
- (v) Select quantitative and qualitative gender-specific output, outcome and impact indicators and integrate them into the project/programme results log-frame; and
- (vi) Design project/programme implementation and monitoring institutional arrangements, including participatory monitoring approaches involving designated project beneficiaries;

(b) Gender equitable stakeholders' consultations with the gender parameters provided in the policy and develop specific measures to enhance women's participation in the consultations; moreover, gender sensitive information disclosure for consultation purposes, provided in time and location that are easily accessed by the affected women, and in languages understood by them;

(c) Inclusion of gender perspective in the application of the mandatory project/programme social and environmental safeguards in line with project/programme-specific requirements of the Fund's ESS in accordance with decision B.07/02;⁴ and

(d) Project screening for gender sensitivity responsiveness at the various stages of the project preparation, appraisal, approval, and monitoring process, by the relevant bodies (NDAs, AEs, the Secretariat, and the Independent Technical Advisory Panel).

8. While a large number of guidelines, toolkits and sourcebooks have already been published by a range of institutions, Rather than issuing similar tools, the Fund, after will reviewing the existing stock of material, will issue necessary Fund-specific detailed guidance to provide its partners with the specificity and backstopping they need to be successful in gender-responsive implementation efforts, and recommend the most relevant items to its partners to use.

⁴ The initial socioeconomic and gender assessment and the accompanying project/programme-specific gender action plan are is recommended for the Fund to proactively build in a gender-responsive sensitive approach to project planning design and implementation arrangements, by contrast to the Fund's ESS, which employs the conventional 'do no harm' approach in order to ensure that all project/programme potential environmental risks are addressed and that measures are identified to offset these risks.

III. Capacity-building

9. Gender training and gender information sessions will be regularly provided for the Board and the Secretariat staff in order to build up the Fund's gender sensitivityresponsiveness. It is expected that the Fund will complement its own staff capacity-with consultants and build a roster of gender and climate change experts., and that additional gender-competent staff will be recruited as its activities and staffing increase over time.
10. NDAs and entities may request readiness and preparatory support from the Fund related to gender training and capacity-building in particular to meet the requirements of GAP such as gender assessment, provision of gender sensitive information and measures for enhancing women's participation. They may also obtain gender training and capacity-building through their partnerships with other organizations (such as bilateral, multilateral and international organizations as well as NGOs).

IV. Outputs, outcomes and impact indicators for monitoring and reporting purposes

11. Gender responsiveness through quantitative and qualitative indicatorssensitivity has been applied to the Fund's initial results management framework (GCF/B.07/04) and further development document (GCF/B.08/07) for both adaptation and mitigation. Further work must focus on the methodologies for gender-disaggregated data collection of relevant indicators. Common to both adaptation and mitigation are the gender measurement of the climate change resilience of women and men, and of women and men's behaviours to sustain low-emission development.
12. To monitor the gender policy implementation, two specific portfolio indicators are proposed:
 - (a) For quality at entry: The percentage of adaptation and mitigation projects that include specific gender elements and gender-sensitive-responsive implementation arrangements; the extent to which gender-disaggregated data is being used in current activities; without the use of such data, commitments to "gender-responsiveness" are illusory; and
 - (b) On the basis of best practices from other organizations, a portfolio classification system, which consists of a project rating at entry and at closure for gender responsivenesssensitivity, will be adopted.⁵ Such a system allows for a global analysis of the portfolio from a gender perspective, an assessment of effectiveness and, eventually, corrective action to be taken.

⁵It involves giving a rating to projects on a scale from those with a significant gender focus to those with a marginal gender focus (e.g. just the safeguards) or with no gender element at all. The Fund could initially apply the Organisation for Economic Co-operation and Development's gender equality policy intention marker.

V. Resource allocation, accessibility and budgeting

13. The Secretariat's administrative budget will include adequate dedicated resources for the implementation of the gender policy. Gender-related expenditures will be reported annually as part of the financial audits of the Fund's activities and reflected in the Fund's financial statements.

14. As the rationale for the Fund's gender policy is to generate greater and more sustainable gender-equitable climate change results, the project approval process ~~may-should~~ consider giving additional weight to projects with well-designed gender ~~considerations such as elements, gender analysis and the use of gender-disaggregated data,~~ assessment of gendered solutions, planning of gendered solutions, gender-responsive budgeting, gender mainstreaming in monitoring and evaluation, and reporting on gender outputs, outcomes and impacts.

15. The project approval process shall ensure that the project's gender considerations are fully funded with guidance provided by the Secretariat to accredited entities on how to do adequate gender budgeting for GCF proposals. Project consideration and approval should be conditional the inclusion of sufficiently elaborated and adequately funded gender elements.

16. As part of their reporting to the Fund under the Monitoring and Accountability Framework, the AEs will report on the actual percentage of the project's budget allocated to addressing specific gender elements and gender-responsive implementation arrangements.

5.1 Knowledge generation and communications

174. As a learning institution, the Fund will document the experience and knowledge that it will acquire from the implementation of its gender policy and action plan. In particular, it will seek to identify and show-case good practices from countries and AEs and encourage and support South-South peer-to-peer learning efforts. At the same time, it must tap into the considerable knowledge already available on gender and climate mitigation and adaptation programmes and projects implemented by other partners. The Fund will support knowledge exchange activities on gender and climate change finance and collaborate specifically with other climate funds and the UNFCCC Secretariat on exchanging best-practice experiences.

185. Fund documented experiences and knowledge will be collated into a web-based "knowledge hub/exchange" to allow for gender-relevant reviews and reporting, resources and tools on processes, lessons learned, and best practices to be shared across the Fund and its partner spectrum.

196. The Fund commits to contribute to research and knowledge generation on the links between gender and climate change, and more specifically, on what transformative and paradigm-shifting

[gender-responsive climate action looks like, for example through a joint work program with the UNFCCC's Climate Technology Centre & Network \(CTCN\);](#)

2045. Communicating the Fund's commitment to gender equality, its gender-~~sensitivity~~ policy and its [varied guidance documents to assist AEs, NDAs/FP and other Fund partners with gender-responsive implementation guidance](#) will be a strategic communications activity and an integral part of the Fund's communications plan. [It should be seen also as a core responsibility of GCF Senior Management as well as the GCF Board members and Co-Chairs.](#) It will be important to communicate to the public not only how the Fund is implementing its gender policy, but also to seek ~~periodic~~ feedback from stakeholders and partners, [in particular women from grassroots civil society organizations, gender and women's rights groups, and representatives of indigenous groups](#), on the implementation of the policy and on possible improvements in the action plan [as an iterative engagement through inter alia call for submissions, joint events and learning and exchange sessions.](#)

The proposed initial duration of the gender action plan is three years so as to allow the Fund to implement these activities and then assess the implementation after this three-year period. Subsequently, the duration of the gender action plan is expected to align [with the Fund's business cycle.](#)

Comment [LS6]: This wording is outdated. Could be tied strategically to the implementation and review period for the strategic plan of the GCF; alternatively, as in other Funds, a link to the replenishment cycle might be considered.