JOINT CSO SUBMISSION ON STRATEGIC PROGRAMMING

I. Introduction

The Green Climate Fund (GCF) Board in decision B.21/18 requested the Secretariat to prepare, for consideration by the Board and the other actors in the replenishment process, a strategic programming document outlining scenarios for the GCF's first replenishment period. These were to be guided by ambition mitigation and adaptation scenarios based on the GCF's implementation potential, while taking into account the needs of developing countries. A first version of this document was discussed at B.22[1]. Based on comments received by members of the GCF Board, a second version of the strategic programming document[2] was then shared for discussion at the First Replenishment Consultation Meeting in Oslo/Norway on April 4 and 5, 2019. The Global Facilitator of the GCF replenishment process, who chaired the Oslo meeting, invited participants of the Oslo meeting to provide comments by April 26, 2019[3].

This joint submission by civil society organizations active in the GCF, coordinated by the CSO Active Observers[4], responds to this invitation. This is also the first opportunity for CSOs to formally provide more detailed comments in addition to a short intervention given at B.22, where the first version of the document was presented, since the CSO active observer present at the Oslo meeting was not given the opportunity to speak.

In Oslo, discussions highlighted the urgent need to act and the GCF's ability to disrupt business-as-usual approaches, especially in the wake of the IPCC special report on 1.5 degrees. For the GCF to be a leading force for transformation, it has to maintain and expand its position as the main multilateral financing channel under the UNFCCC and as the primary financial mechanism supporting the implementation of the Paris Agreement by assisting developing country Parties in implementing their Nationally Determined Contributions (NDCs) and National Adaptation Plans (NAPs). The replenishment process therefore must send the signal that the GCF can act at scale to give developing countries the confidence needed to increase the ambition of their NDCs in 2020 *both* in process (by involving a wide range of in-country stakeholders, especially civil society) and output and align them with a 1.5 degree pathway. CSOs active in the GCF therefore call on developed country Parties to contribute their fair share to ensure that the GCF replenishment process mobilizes significantly beyond double the commitments made during the initial resource mobilization (IRM). These contributions should overwhelmingly be given as grants, not loans or capital contributions, to provide the GCF with the maximum flexibility and the risk appetite to fulfill its mission.

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[1] https://www.greenclimate.fund/documents/20182/1424894/GCF_B.22_Inf.12_-_Strategic_Programming_for_the_Green_Climate_Fund_First_Replenishment.pdf/9933d93d-2673-022c-8c1b-cd5213973674.

[2] https://www.greenclimate.fund/documents/20182/1429983/RC1-2_Strategic+programming_version2_consultation+meeting_oslo_20190321.pdf/0caf3e45-be5a-7b86-01d6-c3008fe25424.

[3] https://www.greenclimate.fund/documents/20182/1429983/Summation+by+the+Global+Facilitator_First+Replenishment+of+the+GCF_First+Consultation+Meeting.pdf/77da221f-ec42-9449-a759-0e32eebe8ae7.

[4] A list of CSOs active in the GCF, which have contributed and signed on to this submission, is provided at the end of this document.

II. Unique role of GCF

The GCF is the largest dedicated climate fund, and it serves as the operating entity of the financial mechanism under the UNFCCC and the Paris Agreement. Unlike other financial mechanisms, the GCF has several core objectives, unique features and guiding principles referenced in the Governing Instrument, which should guide and be further amplified in the Fund's strategic programming during its first Replenishment phase (R-1), including in particular: placing all climate investments in the broader context of sustainable investment (maximizing synergies to achieve SDGs within a rights-based framework); pursuing a multiple benefits approach to investment in realizing that scarce funding is used best when it delivers climate and core development outcomes at the same time; unlike any other climate fund, starting out its operations with a mandate to gender mainstream its actions; mandating to enhance direct access and improve overall funding accessibility; and seeking a balanced, 50/50 allocation between mitigation and adaptation, with a clear focus on the most vulnerable countries, communities, and people.

Thus the purpose of the GCF, built into the DNA of the Fund's genesis, was to go beyond a focus on just effectiveness and efficiency in its climate action to also provide equity, and these understandings of the GCF's unique commitment to sustainable development, gender, direct access, and vulnerable populations should inform the GCF's strategic programming. The principles-based guidance from the Governing Instrument is a comparative advantage and distinguishes the GCF in the global climate finance architecture, and correspondingly, a robust understanding of achievement must be deployed alongside operational goals. Being effective and efficient cannot be limited to mere financial terms, but instead effectiveness should be considered more holistically.

While this speaks to the increased quality of the climate investments the GCF should be pursuing during R-1, the GCF's raison d'etre as the most important multilateral climate fund for the implementation of the UNFCCC and Paris Agreement commitments indicates that a focus on quality must be matched by a focus on increasing the quantity of funding that the GCF channels. During R-1, the GCF must be further capacitated (including through necessary Secretariat capacity increases, building a regional presence and realizing necessary governance improvements, such as in particular in GCF Board operations) to channel a growing share of the USD 100 billion per year by 2020 climate finance commitment made by developed countries during COP15 in Copenhagen, and post 2025, a commensurately growing share of the new collective financing goal commitment, including in particular for multilateral adaptation financing, through financial resources to be provided largely by developed countries that are new, additional, adequate, and predictable.

The GCF is uniquely positioned to "catalyse climate finance, both public and private, and at the international and national levels", as the Governing Instruments demands (para.3), both in quantitative and qualitative terms through its partnership approach. Working through a diverse and multi-faceted network of accredited entities, now counting 84 implementing partners (and growing), and bringing together a large variety of actors that need to be engaged in climate change investments to support transformational change in recipient developing countries, allows the GCF to significantly "punch above its weight" in the climate finance architecture. This should not only be looked at in purely financial terms, as a competition to leverage ever more co-financing, but rather as an opportunity to provide leadership on climate finance, with GCF accreditations driving broader institutional and attitude shifts. The GCF can use its accreditation process to promote a paradigm shift to low-carbon and climate resilient development, including through encouraging its partners to adopt best practice gender, environmental and social safeguards, and related standards as core building blocks for ensuring this paradigm shift.

To achieve this transformational impact, the GCF must keep its attention on the long-term need for a transition to a low-carbon and climate-resilient development. Focusing only on R-1, for example, could lead to an embrace of the project-specific assessment approach (PSAA) for entities otherwise capable of being accredited, with success judged by short-term impact in terms of tons mitigated or quantitative claims about beneficiaries reached instead of a broader sense of how the GCF can contribute to lasting change. The accreditation process is one of the levers that the GCF has at its disposal to bend the trajectory of institutional investment toward a 1.5 degree pathway for 2030 and beyond. R-1 must not be perceived as a proving ground for the GCF so much so as an opportunity to build the foundation for ever-increasing impact that will fundamentally and significantly contribute to global goals around climate justice outcomes.

III. Discussion of “Pursuit of Impact Programming” (Investment Scenarios Discourse)

CSOs active in the GCF agree with the core sentiment already expressed during the Oslo First Replenishment Consultation Meeting that in moving into its first replenishment period, the GCF must focus on “programming for impact” as the preferred approach to reach its highest ambition (“upper frontier”) in both mitigation and adaptation funding and that business as usual (BAU) for the first replenishment period is not an option.

In our view, for the GCF to reach its highest funding ambition is dependent on a pursuit of impact programming approach that is solidly people-centred and human-rights based and more explicitly focuses on driving longer-term shifts rather than too narrow a focus on outcomes. Such a focus on longer-term sustained shifts need to also be much better defined and reflected in the GCF’s results management and performance measurement frameworks, which need further development during R-1.

Mitigation impact

As currently presented, the strategic programming document focuses too much on the role of cost-effectiveness of emissions reduction efforts and/or co-financing (leveraging) in mitigation. Making emissions reductions cheaper cannot be the primary goal if it leaves people behind. Such a quantitative emissions reduction calculation based on mitigation finance provided and leveraged is biased in favor of large-scale banked intermediation of mitigation investments and discouraging of non-bank direct access actions. It is too narrow to gauge the overall effectiveness of GCF programming over the first replenishment period. Effectiveness does not only mean cost-effectiveness considerations, but instead must take into account qualitative criteria to assess the impacts of GCF funded actions. As such, some of the outcomes that we are looking for require time to come to full fruition. A focus on supporting country-driven behavioral and policy changes reflecting broad country-ownership beyond a narrow government focus to also include a wide range of in-country stakeholders, organizations, and specifically communities in recipient countries must be part of the GCF’s efforts to maximize investment impacts. This requires iterative and generous investing in institutional and human capacity to ensure lasting societal and institutional change.

During the Oslo First Replenishment Consultation Meeting, there was discussion on achieving better value and greater impact. A multiple benefit approach is smarter investment, embedding climate action in a broader pursuit of other environmental, social, economic, and gender equality outcomes. This is also consistent with the mandate of the Governing Instrument, which demands that all GCF investments are placed in the context of sustainable development. In our view, this is the best way to increase the overall effectiveness, efficiency, and lasting impact of GCF investments. As the capacity of the Independent Evaluation Unit develops, along with the reporting functions of the accredited entities, we hope new ways of capturing and sharing these process and outcome results will provide a richer measure of impact.

Adaptation Impact

In its next iteration, the strategic programming document needs to better elaborate scenarios for pursuit of adaptation impact programming. It needs to start out with a clear commitment to an understanding that the balance in funding allocation between mitigation and adaptation that the GCF pursues in line with its Governing Instrument needs to be in nominal terms, not grant-equivalent terms, if the GCF is to fulfill its mandated role in the global climate finance architecture, including by addressing the systematic underfunding of adaptation.

In this context, it is crucial that the GCF agrees on a clear adaptation approach that is grounded in supporting interventions that both address climate risks and underlying vulnerabilities. The GCF's approach to adaptation funding, to have maximum impact, must allow for programming based on local context with the goal of reaching and supporting the most vulnerable and marginalized population groups in the most severely affected communities, counties, countries, and regions. Such tailored interventions must uphold the rights of people and communities, including the right to food, access to water and energy and adequate housing. Further, measuring the impact of adaptation efforts must go beyond the narrow quantitative indicator of direct/indirect beneficiaries reached (as the IEU's recent evaluation of the GCF results management frameworks also highlighted). Instead, there need to be indicators (both quantitative and qualitative) to understand whether and how interventions have made vulnerable communities more resilient to climate impacts.

There also needs to be a stronger focus on the National Adaptation Plan (NAP) support provided through GCF readiness financing. In particular, funding for NAPs can help countries to consider long-term climate risks (moving past the 5-10 year time horizon) to develop better interventions and avoid potential maladaptation. In addition, it is critical that NAP processes ensure more active participation of CSOs and particularly affected population groups and communities as a matter of GCF best practice.

CSOs active in the GCF therefore argue that the current efforts of artificially differentiating between development vs. adaptation in investments that try to reach the vulnerable and marginalized population groups at the "bottom-of-pyramid" is counterproductive. The ongoing attempt to apply an incremental cost reasoning to GCF adaptation funding undermines effective and sustainable adaptation interventions. An incremental cost approach assumes that there is a hypothetical development baseline that will be met by other funding, which is both impractical and counter-productive for the poorest and most vulnerable. Applying such an approach will steer the GCF away from actions that help people who need it the most due to sheer technical difficulty of calculating incremental costs in underserved areas. The GCF's pursuit of strategic adaptation impact programming must support full-cost grant adaptation finance without prescribed co-financing requirements and incremental cost approaches.

CSOs' Role

We would also like to highlight that civil society aids in increasing the impact of the Fund and ensuring it fulfills its mandate. While principles such as enhancing accessibility and unlocking the full potential of the

GCF were discussed within the presentations in Oslo, the role of civil society in these activities, including knowledge and awareness building, contributing technical expertise, and ensuring policies reflect best practice, was not acknowledged. As the Fund develops, so does our CSO community. An important part of increasing the GCF's programming impact during R-1 thus comes from reviewing and upgrading the participation of civil society observers throughout GCF processes and at all levels from the project/country level to the engagement at Board meetings and with the GCF secretariat.

In this respect, the review of (CSO) observer participation in Board proceedings should be seen as only the first long-overdue step to fill a significant policy gap on the outset of R-1. Further development of stakeholder engagement and participation mechanisms throughout the GCF processes are necessary. As the Governing Instrument in para. 71 clearly recognized, the participatory design of projects and programs will enhance GCF impact, effectiveness, and efficiency. Thus, the next iteration of the strategic programming document needs to put much more focus on facilitating the development of participatory modalities for (sub-)national planning and broad and well elaborated stakeholder engagement as a necessary requirement to develop priority action plans and translate them into impact investments. The GCF in its strategic programming must address this weakness of current NDC planning and GCF country programme development.

Private Sector Role

One of the key focal areas of GCF programming is its dedicated private sector engagement focus. In this respect, we welcome the discussion in the strategic programming document of the desired role of the GCF's Private Sector Facility (PSF) in pursuing programming for impact. In the case of private sector financing, for example, the strategic programming document references some findings of the upcoming new GCF private sector strategy (to be discussed by the GCF Board in B.23 or B.24) by identifying as crucial "key gaps in the financial ecosystem" where the GCF could focus its private sector financing for maximized impacts smaller scale financing, financing for BOP (bottom of pyramid) projects, early-stage project preparation and technical assistance, local currency lending and guarantees. We would encourage a stronger focus of GCF private sector engagement in these areas. In relation to this, it is encouraging to see that energy generation and access funding would include a focus on institutional, planning and policy support in countries where markets are nascent or least mature (p.65). However, overall, it should be noted that the proposals elaborated in the programming document do not consistently address the need for BOP and smaller scale financing.

Skills training, technical support, and greater capacity building (p.33) are also vital since in many cases the GCF is working in areas where a strong base of local private companies does not yet exist. This requires grant financing. Portfolio-level co-financing and/or leverage goals (p.40) could hinder the objective of targeting BOP projects, or those in LDCs and nascent markets, however.

Further work to improve the capacity and engagement of NDAs with private stakeholders (p.34) is also welcome. While public-private partnerships (PPPs) can be one way to better engage the private sector, it does not follow that they should be prioritised. Indeed, the strategic programming document in its next iteration should do a better job in articulating both the potential and the limits of PPPs. PPPs often come with several considerable drawbacks. While it is the private sector that stands to profit from PPPs, the public sector (or the GCF itself) assumes the risks and liabilities in case of loss, which can result in citizens facing higher costs of the provision of basic services such as access to energy or water. provision. PPPs can also lead to higher cost infrastructure.. The private capital used to fund programmes is often more expensive than its public equivalent because of higher interest rates; private financiers often expect a higher expected rate of return on their investments; the complex structure of deals can lead to higher transaction costs; and private procurement processes can result in higher overall construction costs. There are also a number of hidden costs due to high levels of contingent liabilities (such as those related to currency fluctuations). Other potential issues include a lack of transparency and accountability, a poor track record of achieving pro-poor benefits, and the building of lower quality infrastructure. The GCF should fully evaluate this track record and exercise caution in its plans to increase the number of PPPs that it supports and by no means portray PPPs as the panacea for impactful private sector engagement.

Selected Impact Areas

The strategic programming document version 2 highlighted a number of impact areas across the GCF's result areas where it was recommended that the GCF focus some of its programming during R-1 as a way to maximize impact. From the CSO side, there are a number of concerns with some of the proposed programming directions, namely *inter alia*:

- **Energy generation and access** -- We object to the inclusion of carbon capture and storage (CCS) as one of the technologies the GCF should pursue in order to reduce costs and shift markets in the "energy generation and access" impact area. The GCF should not be funding CCS that perpetuates the continuation of the fossil fuel industry and contravenes the efforts of shifting portfolios of accredited entities away from fossil fuels. Also within energy access, we urge recognition of the need to pursue both on grid (smart grid) and off-grid solutions, such as clean cooking, delivering strongly on impact rather than volume.

- **Forests and land-use** -- A broader conception of forests, land-use, and the benefits of nature-based solutions should be integrated into an understanding of impact programming. The programming document focuses unduly on REDD+ results based financing, including prototyping private sector investments in REDD+ markets. (the latter in the absence of finalized negotiations on Art.6 of the Paris Agreement). Instead a much broader attention to agroforestry, sustainable livelihoods, and addressing the core drivers of deforestation needs to be articulated across the entire spectrum of actors: agroforestry and sustainable livelihoods is not just for indigenous peoples and local communities. Conversely, it seems very telling that the current elaboration in the paper sees REDD+ engagement as the prerequisite of governments and the private sector, when indeed recognition of indigenous peoples' land rights and the protection of biological diversity should not be seen as "co-benefits" of REDD+, but as main outputs of REDD+ programs. Indigenous peoples and local communities are key actors in REDD+ as well as in 'forest value chains'. The next iteration of the paper needs to make a much more enlightened case for the capabilities and role of indigenous peoples and local communities in relation to landscape level planning and protection.

  A landscape approach as pursued by the GCF in its forestry-and land-use related financing should not dichotomize land according to its use. In many instances, local communities and indigenous peoples look at land in a holistic manner, beyond just as carbon storage. This also means more focus on funding for 'land rights', especially in securing indigenous peoples' land rights. The GCF should focus on the economic and climate change benefits associated with secure tenure by indicating the relation between a) secure tenure and reduced deforestation, and b) secure tenure and *farmer willingness to plant orchard groups / pursue agroforestry solutions,* since the time horizons for profits from tree crops are much longer than for grains or other annual crops.

Lastly, the current document in this impact area does little to recognize the importance of primary/natural forests and of maintaining and supporting ecosystem integrity, as opposed to just speaking about forest cover, which could allow for plantations in place of natural forests. More should be said on the importance of protecting these systems – also in relation to water and coastal security -- for which ecosystems such as mangroves, seagrasses, and natural estuaries provide important mitigation, adaptation, and livelihood benefits. Talking about ‘forest cover” is but one dimension of what should be the primary measure, which is the support of or rehabilitation of *ecosystem integrity.*[5]

- **Climate information and early warning systems** -- While this is a critical building block for successful adaptation and mitigation interventions across all developing countries, the focus of providing climate information and early warning systems should not just be on managing and minimizing economic losses but prioritize the protection of human life, and the livelihoods these depend on. GCF investments in this area must include a commensurate focus on safeguarding rights to information/accessibility of climate data as a public good provision. This should not be a private sector profit-making capture along the “climate services value-chain” (p.31) subsidized with GCF concessional funding. Furthermore it must give strong attention to applying climate information and early warning systems in a participatory way that the beneficiaries’ use of these, their capacities and constraints are in focus. Otherwise, the technologies supported will not be used effectively.

- **Agriculture and food security** -- the substantial role of this impact area, which is a priority in many developing countries’ NDCs and the GCF pipeline, warrants a careful approach to programming for impact in both mitigation and adaptation. Such an approach must center on the human right to food (for example in carefully limiting biomass approaches), the protection and safeguarding of land-tenure for indigenous peoples and local communities (vs. land-grabbing for intensive agricultural production), as well as on acknowledging the traditional knowledge and experience of local communities and indigenous peoples (for example in terms of traditional seed varieties and seed banking vs. GMO seed use) in order to avoid maladaptation or mitigation approaches that undermine food security. As with the forestry and land-use impact area, the GCF should follow the example of other institutions that use dedicated small grant approaches (such as the Forest Investment Program”s Dedicated Grant Mechanism) as a way to enhance the capacity of indigenous peoples, local communities, and other vulnerable groups to become empowered actors in the implementation of programming for impact.

- **Insurance** -- The emphasis on insurance as the primary risk management approach across a wide range of impact areas and sectors (such as in addressing agricultural risk or providing early warning systems) as suggested in the strategic programming paper is in our view misguided, especially for adaptation. A rights-based approach to adaptation must recognize that insurance is an appropriate solution in very limited circumstances. Insurance schemes should not be pursued at the profit of private sector actors and detriment of local communities whose capacity to cope with slow-onset and extreme-weather events is not actually materially improved through poorly designed systems that fail to anticipate and recognize unavoidable loss and damage, and put the financial burden on those largely blameless for climate change causing greenhouse gas emissions. Insurance is not a silver

[5] CSOs from the GCF CSO Network with specialized expertise in this area would be happy to provide further detailed documentation or relevant literature on these recommendations.

bullet.[6] Instead adaptation measures safeguarding and strengthening social support systems need to be given more support by the GCF during R-1 in addressing core adaptation needs of the most vulnerable people.

IV. Strategic Direction -- Country-driven Transformation, Catalytic Investment

Country ownership and country-driven programming must remain at the core of the GCF's work, but this means focusing more than within the IRM period on those that have not yet been reached or profited from GCF resources. Responding to priority countries' needs means a renewed attention on adaptation, including safeguarding future options for full cost adaptation financing and doing away with the harmful dichotomy between adaptation and development, and related incremental cost approaches, that underfund effective and sustainable implementation of climate action on the most local level.

But country-ownership cannot continue to be considered as "government-ownership;" instead, it must be full country ownership including all stakeholders at all levels of in-country GCF process decision making . The GCF's efforts to maximize investment impacts must include a focus on supporting country-driven behavioral and policy changes reflecting broad country-ownership beyond a narrow government focus to also include a wide range of in-country stakeholders, organizations, and specifically communities in recipient countries. This requires iterative and generous investing in institutional and human capacity to ensure lasting societal and institutional change, and it only works if the GCF is committed to enhancing and scaling up meaningful and effective public and stakeholder engagement, especially of indigenous peoples, local communities, affected people, and women in the design and implementation of projects and programmes. Increased and inclusive engagement of civil society is key to achieving the quality in both design and implementation that is needed for the pursuit of impact programming and to truly realizing country-ownership.

The strategic programming document version 2 correctly points out the importance of the GCF supporting developing countries' articulation of needs and ambition through successive NDC cycles. It is important to point out that 'ambition' in an NDC supported by the GCF should refer to *both* process and output. A true 'nationally determined' contribution requires civil society involvement as a core part of the engagement of all relevant in-country stakeholders; it cannot be the work of international consultants brought in for the purpose of writing the NDC or a select team of experts drawn only from government agencies. If the GCF, as indicated in the strategic programming document, truly aims at "*leveraging [our] status as an operating entity of the UNFCCC Financial Mechanism to set new standards with regard to country ownership, direct access, and level of ambition,"* it needs to ensure that developing country civil society groups, who are in fact making the argument for high ambition, and high levels of country ownership, are empowered through GCF procedures and provided targeted support to help within their countries with the dimensions of both process-design and output-ambition. NDC Implementation Guidelines, for example, specify that countries can include in their NDCs information about planning processes including public participation and engagement with local communities and indigenous peoples in a gender-responsive manner, and the GCF should encourage this through iterative NDC planning and implementation support.

GCF encouragement and support for the development of GCF country programmes plays a core role in this, as does targeted GCF readiness support in its recently updated "Readiness 2.0" version. However, in order

[6] https://us.boell.org/sites/default/files/not_a_silver_bullet_1.pdf.

for GCF readiness to support multi-stakeholder planning processes that are truly country-owned, those processes must go beyond “multi-stakeholder government planning processes” as mentioned in the strategic programming document version 2 (p.37) to instead include local communities, indigenous peoples, women and civil society groups centrally. This is also necessary to correct in readiness 2.0 the existing weakness of the GCF readiness program in supporting CSO engagement in in-country coordination processes that was highlighted by the recent IEU readiness evaluation. An updated and finalized version of the strategic programming document should also include the outcomes of the ongoing separate evaluation by the IEU on country ownership, including the extent to which readiness financing has contributed to improving country-ownership.

Too often, and in too many countries, including ones in which civil society groups who contributed to this submission reside, governments have not consulted with local communities, indigenous peoples, women, and other stakeholders in developing climate policies, NDCs, or climate programmes/projects brought to the GCF. Instead these have been decided on by governments, businesses, or international agencies or consultants, among others. Largely this stems from the fact that there is not a culture of stakeholder engagement in many countries or it is treated as a check-the-box exercise. To be in line with its (or the goals of its) Governing Instrument, safeguard policies, and information disclosure policy, the GCF must ensure that activities supported by the GCF have been developed in full consultation with local communities and that the voices of the people are heard.

One way that the GCF could focus on this as part of this strategic programming during R-1 is to draw up much clearer guidance on in-country stakeholder participation and country coordination as advised by the IEU in its evaluation of GCF readiness support. Such updated guidance should draw heavily on the best practice experience of the Country Coordination Mechanisms (CCMs) set up by the Global Fund to Fight AIDS, Tuberculosis, and Malaria and applying lessons learned from working stakeholder mechanisms and practices adopted by few developing countries in GCF coordination. Readiness support, including standardized readiness support package solutions, must be focused on CCMs as desired outcomes. The GCF Secretariat should also showcase individual good practice NDA examples in country programme development or readiness activities, to encourage peer-to-peer learning and sharing of experiences.

Part of the GCF’s unique role in the climate finance architecture is its willingness for increased risk-taking thanks to its professed greater “risk appetite” as a way to catalyze innovation at different scales. While this is identified in the strategic programming document version 2 correctly as an important role for the GCF during R-1, the GCF’s definition of “risk-taking” for the R-1 timeframe needs to be redefined and broadened. , as it is currently exclusively reserved for engagement of private sector actors and in the context of “new instruments, investment vehicles and partnerships” (p.38). Instead, the GCF must be much more willing to take risks by engaging with a much broader range of partners, including non-government, non-private sector local actors, such as community groups or civil society groups. Some of this broadened risk taking should involve the willingness to take ‘bigger risk with smaller amount/small finance approaches’, for example those in which access to GCF finance is shared through Enhanced Direct Access (EDA) and devolved decision-making via small grants or small loan approaches with a whole range of new actors, including local civil society groups or micro entrepreneurs, such as small-scale farmers or local fisherpeople. It is striking that during the IRM some of the approved projects with the most conditions imposed by the Board were small-scale EDA projects involving small grant/small loan facilities to bring GCF funding directly to local communities. This is in contrast to large-scale fund-of-fund financial intermediation approaches involving private sector engagement, in which the willingness to take risks was commensurately higher. Devolved financing/EDA approaches with direct access to small finance tranches have the capacity for scale through easy replication in numerous countries and through aggregation of small scale project ideas domestically (f.ex. through related calls for proposals) in a funding package suitable for GCF support.

While the GCF is of course the most significant multilateral climate fund for the implementation of the Paris Agreement, it is obviously not the only one. Thus, it is important to highlight the role of the GCF in replicating and scaling up (and if necessary improving upon) pilots and smaller scale approaches of other funds, including in adaptation, where with the Adaptation Fund, the LDCF, and the SCCF there are other actors for micro-scale adaptation finance support under the UNFCCC. As part of the strategic programming discourse for R-1, the GCF should further explore options for complementarity and a strategic division of labor with other funds serving the financial mechanism of the Paris Agreement, although that should not mean that the GCF would not be able to engage in micro-level adaptation projects or program components anymore during R-1 as needed and requested, for example in particular financing approaches or sectors (such as EDA, private sector focused MSME engagement, or focusing on innovative approaches or instruments).(see p.39)

V. Portfolio-Level Goals

CSOs active in the GCF support the maintenance of the GCF's core resource allocation goals as set out in Decision B.06/06, in particular the aim to balance the allocation of GCF resources 50:50 between mitigation and adaptation as well as ring-fencing 50 percent of the adaptation funding for LDCs, SIDS, and African States. These are very unique GCF strengths that also go a long way in addressing significant systemic underfunding in the global climate finance architecture for adaptation. However, as part of the strategic programming commitments, we would like to see a clear articulation that the 50:50 goal is to be met in nominal terms, and not just in grant equivalent terms, as it speaks to the purposing of GCF funding overall, and not just to its level of concessionality. The strategic programming document in its next iteration should also include a clear priority commitment to continued public sector adaptation support provided in the form of grants, including full-cost grant financing, and the latter in particular for activities prioritizing support for local communities and BOP marginalized beneficiary groups, including women and indigenous peoples.

As indicated already elsewhere, CSOs active in the GCF are critical of a portfolio level co-financing and/or leveraging goal as this does not speak to the impact of GCF programming nor the quality of supported activities on the aggregate level. It is particularly unsuitable in the context of adaptation action and would in contrast lead to maladaptation and discourage necessary investment approaches. In addition, there is already some portfolio level leverage indicator in the mitigation performance measurement framework. Expanding this to a portfolio wide goal would equate a means to an end (generating more co-financing or financial leverage to have more financing available for climate actions) to the impact itself (transformational climate action in the context of sustainable development through pursuit of a multiple benefit approach). Civil society colleagues likewise do not support portfolio sector targets, as this undermines country-ownership as well as country needs and priorities.

However, CSOs active in the GCF would support the possibility of a resource allocation objective on Direct Access. In fact CSOs active in the GCF in making their input to the initial Strategic Plan of the GCF highlighted the possibility of such a goal as an indicator of success for the long-term strategic vision of the GCF, including by making Enhanced Direct Access its primary access modality. Given the reality of approved funding during the IRM, the GCF in moving forward with its strategic programming commitments for R-1 should in fact consider a significant portion of at least a third of funding approved for DAE access (or double the current percentage) to correct the current imbalance of 84 percent of approved funding being channeled through MIEs, as just 16 percent of the approved USD 5 billion as of March 2019 is programmed through DAEs. The goal for subsequent replenishment rounds should be even higher, such as at least 50 percent for R-2, with an expanding share also devoted to EDA. This would be in line with best practice experience of the Adaptation Fund, which pioneered direct access and even instituted a 50 percent cap of financing channeled through its MIEs to give its DAEs an opportunity to access funding.

VI. Resource Allocations

CSOs active in the GCF are supportive of upfront allocations for readiness and preparatory support in line with projected needs during R-1 based on current trends, as iterative readiness support, including for comprehensive stakeholder participation and country coordination efforts, is crucial to the GCF pursuit of programming for impact and this would allow for multi-year funding commitments. Likewise dedicated upfront amounts for the project preparation facility made sense, including for scaling up technical assistance to DAEs and NDAs for PPF applications and the identification of high impact project concepts in line with country needs and priorities.

CSOs also support an identified floor amount for the Fund's operating budget. This should include funding for a GCF regional presence (p.47), which CSOs have supported in the past as a way to enhance the capacity of the Secretariat to enhance their guidance on how to improve country ownership and country coordination, including by increasing opportunities for CSOs to better engage directly with the Secretariat. Regarding the latter, CSOs would recommend including a generous dedicated allocation as part of the administrative budget as a recurring budget line for the Secretariat to directly support stakeholder engagement of CSOs and representatives from local communities, women, and indigenous peoples beyond what is currently possible under readiness (as it needs to be requested by NDAs). This could include a set-up like a dedicated grant mechanism (as for example the Forest Investment Program under the Climate Investment Funds), meaning a small grant facility operated at the Secretariat level to allow direct finance access for community groups, women's groups, and indigenous peoples for activities in which the ability and power of CSOs needs to be better supported, such as CSOs' role in climate awareness raising, capability building on all things GCF, monitoring and reporting functions, etc.

VII. Pipeline Programming

A. Country-driven pipeline programming

As already elaborated under Section IV on country-level transformation, with the proposed increased use of country programmes as a way to develop GCF pipeline programming in line with NDCs, the role and participation of civil society organizations and local communities as core stakeholders in the development of country programmes needs to be vastly improved to ensure that their needs and priorities are addressed within those articulated for the country as a whole. So far, there is scant evidence of sufficient stakeholder consultation in the country programmes submitted, let alone integration of stakeholder concerns and needs. Thus, as part of the strategic programming guidance emerging for R-1 the GCF Secretariat needs to elaborate clearer guidelines as well as commit to showcasing best-practice examples to increase accountability and transparency of how inclusive and participatory those key strategic country documents were developed.

CSOs active in the GCF currently do not advocate for a country-based allocation for particular investment areas or regions beyond the mandate of the GCF allocation framework. We certainly feel that it would not be conducive to the GCF’s mandate to replicate the GEF’s STAR system of guaranteed (but minimized) “allowance of funding.” However, the notion of equity and fairness of countries’ access is something to be actively monitored during R-1. Instead of a country-based allocation, the GCF could reintroduce a potential country-cap to avoid a country-specific concentration risk under its risk management framework (which currently only applies to AEs). Conversely, the GCF should also be mindful to potentially prioritize technical assistance and support for ‘neglected’ countries that have received so far very little or no support at all through existing climate funds.

Already in the past, CSOs active in the GCF have expressed the need for specific sectoral guidance and funding proposal policy framework, especially if they are used to highlight certain no go areas such as an exclusion list for certain approaches and technologies (such as CCS, nuclear energy, or euphemistically misnamed ‘clean coal’ projects) or to provide a clear set of criteria for the engagement in specific sectors, including guiding principles to protect human rights or environmental/ecosystem integrity (such as a sector guidance on biomass, the use of invasive species, or the prohibition of plantagen reforestation approaches).

B. Strategic Programming through Requests for Proposals

Request for proposals (RfP) are a way of targeting GCF investment focus, including by adding some specific qualifying criteria (such as a score card or check list) in addition to the investment criteria applying under the normal spontaneous proposal submittal process. While we recognize that RfPs can be helpful in achieving the goals of the GCF, they should not be the primary mechanism for funding nor should they be used to replace the GCF's normal practice. As such, RfPs should be carefully developed and limited. The GCF should also evaluate all RfP schemes at least once a year and make necessary changes in their respective Terms of Reference (ToR) to apply lessons learned on an ongoing basis to the incoming project application as well as the adoption and implementation of projects under these schemes.

In particular, RfPs offer an opportunity to focus on areas of financing that might otherwise be under-represented by submissions from accredited entities. As such, the focus of RfPs should be to extend the GCF's reach in terms of direct access entities and smaller scale projects, in particular insofar as those might be offered a more streamlined (or project-specific accreditation approach). In this regard, we would welcome the continuation of the MSME programme and EDA pilot, although the process for making these proposals and their evaluation by iTAP would need to change to encourage greater uptake and allow for speed of implementation. An RfP for incubators or challenge funds could have similar benefits.

However, the scope and focus of the RfP for mobilising funding at scale is very different, so the kind of funding proposals advanced under that programme should no longer be advanced under this umbrella. In particular, we would be very concerned if larger, high risk activities promoted by private sector entities were considered without the due diligence offered by the full GCF accreditation process. We also feel that several of the proposed prospective targeted RfPs supported in the strategic programming document would undermine the GCF’s mandate by providing misplaced incentives for false solutions, such as RfPs on “innovative design for private sector investment in forests”, or “unlocking the potential for insurance” (p. 43).

VIII. Access Modalities

A. SAP, Readiness, EDA, PPF, project approval process

A much stronger focus of the strategic programming document in its next iteration should be on measures to strengthen the accessibility of GCF finances through direct access and enhanced direct access, which is also what distinguishes the GCF in the global climate finance architecture and increases its comparative advantage to other existing funds, especially also for mitigation actions. As CSOs active in the GCF, we would like to see such access improved, specifically the access of the smaller direct access entities (DAEs) and the people and communities they serve, and the expansion and streamlining of the Simplified Approval Process and Enhanced Direct Access pilots for this group. This also means an end to the first-come, first-served approach to project financing, which has distinguished the GCF funding allocation during the IRM period and should be discontinued. It is not compatible with the GCF's mandate for innovation and transformation that 84 percent of its approved financing as of March 2019 continues to be programmed through MIEs. This percentage should shrink significantly over the first replenishment period. As we have elaborated in section V. of this submission discussing a portfolio goal, while CSOs do not support portfolio sector targets, the GCF during R-1 might need to consider ring-fencing a significant portfolio share for DAE access. In this context, it is especially worrisome that the GCF touts its success in fast tracking the accreditation of more direct and regional entities (now 55 percent compared to international AEs at 45 percent) without acknowledging that the increased number of regional and direct access entities must translate into a significant increase of approved funding compared to IAEs during R-1 as part of the Fund's strategic programming vision.

The strategic programming document must also be much clearer on how MIEs during R-1 are held accountable to support the capacity building of national actors in line with the accreditation framework mandate, for example through twinning with DAEs. Such an assessment of MIEs role in support of DAEs in countries in which they operate must be a clear requirement for re-accreditation efforts, which will start in Spring 2020.

Regarding the Simplified Approval Process (SAP), which CSOs have championed from the beginning as a way to increase accessibility to GCF funding, we would like to expand the utility of the SAP, especially for DAEs for micro and small-scale no to low-risk projects (which in our reading would already exclude most Cat. B projects). However, we would question the use of the SAP by MIEs that are in general not subject to the same project proposal elaboration and documentation challenges that many DAEs face. In our view, the use of the SAP as an "incubator" and "value chain link between pilot and larger investment projects" (p. 42) is highly unsuitable. As we have argued in the case of the UNEP Bahrain SAP proposal, the SAP process should not be misused to sell a highly controversial larger project by parceling part of it out as an initial pilot or 'test balloon' under the SAP. The SAP should also not be used to undercut specific additional documentation or evaluation requirements, such as score cards, under existing RfPs. Lastly, irrespective of whether micro- and small-scale Cat. C SAP proposals by DAEs are considered for approval in-between Board meetings, for all SAP proposal (like for all other projects) it is critical that civil society in affected countries has access to SAP project documentation in a timely manner and with the required time period to make comments (that is at least 21 days before a Board decision on approval), including through the full engagement of the active observers in such decision-making procedures in the future. The SAP process, even with further simplification, should not eliminate CSOs' opportunity to engage and comment on every SAP project proposal. If such a process is adopted, it should be done on a trial basis at first and reviewed after a reasonable time (i.e. 1-1.5 years) before it ever became standard practice.

Regarding an update to the GCF's existing project approval process, CSOs active in the GCF would welcome the introduction of a two-stage proposal approval process during R-1 if such a process were designed to provide greater transparency into the GCF pipeline and opportunities for stakeholders, including CSOs, potentially affected people and communities, to engage in the process. While the concept notes are currently published online, there is no announcement when a concept note is published, but a two-stage process could and should trigger an announcement and comment period of at least 30 days whenever a concept note is submitted for approval.

B. Accreditation Review

Related to accreditation and the accreditation framework review, we are wary of the proposed project-specific assessment approval (PSAA), particularly if it is meant to facilitate one-off proposals from larger scale private sector actors. In our view, in doing so, the GCF gives up the potential to use its accreditation process and partnership with accredited entities to influence the overall portfolio shift of exactly those actors. Proof of such a portfolio shift is currently part of the re-accreditation requirement. Fully operationalizing this re-accreditation approach is another policy gap that should be speedily closed heading into the R-1, including by finalizing the baseline methodology for assessing accredited entities portfolio shift during their five-year accreditation engagement with the GCF.

In assessing multilateral access candidates for accreditation, MIE candidates should submit detailed documentation of existing capacity-building support for national-level institutions as well as the intended capacity support the MIE aims to provide to potential DAEs after GCF accreditation in the countries it seeks to operate. As already elaborated under Section VIII, MIEs should also be held accountable in re-accreditation, starting in Spring 2020, for the extent to which they support the capacity building of national actors in line with the accreditation framework mandate. As part of the strategic programming vision for R-1, twinning efforts that pair MIEs with DAEs to provide 'learning-by-doing' capacity building should be encouraged.

When accessing accreditation applicant entities, in order to ensure their capacity to program for impact, the on-the-ground experience of communities of the track record of accreditation applicants' activities (such as human rights abuses etc.) must be considered as part of the accreditation process, not just the existence of policies on paper. This means the Accreditation Panel should exert greater efforts in reaching out to in-country stakeholders, including civil society groups, to validate documents submitted by aspiring AEs. Information from communities on the ground as well as looking at the track record, if one exists, of a potential accredited entity prior to its approval is critical to ensuring that an applicant entity not only has the required policies on paper, but also the capacity and track record of implementing them in practice.

While the number of DAEs has increased during the IRM to the point that a majority of the GCF's current 84 accredited entities are DAEs, a focus on programming for impact during the R-1 would make it advisable that further increasing the number of accredited DAEs is coupled with more targeted pre- and post-accreditation readiness support to ensure that the accreditation of more DAEs also leads to increased funding approvals of DAE proposals. In adding DAE candidates to the accreditation pipeline, the nomination of DAEs must be better supported and targeted, including by encouraging the consideration of DAE candidates from countries without existing DAEs or supporting DAEs that increase access opportunities to GCF funding for local communities and population groups, including philanthropic organizations such as small grant making women's or environmental funds.

Lastly, while there are legitimate concerns that the current GCF accreditation process can be too complicated, unpredictable, and bureaucratic for smaller entities and the private sector, increasing transaction costs and making GCF engagement an unattractive investment proposition, especially for smaller-scale, low-risk funding, this should not be equated with a repudiation of the GCF's accreditation framework as it undergoes further review and refinement. We should recall the primary purpose of accreditation in the first place: since the GCF does not directly manage projects and programmes but works through partnerships (accredited entities), its partners need to be able to demonstrate their capacity to implement environmental and social safeguards, uphold fiduciary standards, and ensure GCF funds are effectively deployed. For this reason, CSOs active in the GCF are concerned with the proposal for a broad-based project-specific assessment approach (PSAA) as a way to increase implementation partner engagement with the GCF.

To ensure that project-specific :accreditation light" does not compromise quality and safeguards, the GCF would either need to develop far greater capacity at Secretariat level to ensure ESS and fiduciary standards (moving beyond simply "second level due diligence"), or restrict "project-specific accreditation" to small scale, low risk (category C) projects and programs. Given the former scenario is not envisaged, the latter is the preferable option. This would also create the conditions for the Secretariat to gradually gain due diligence capacity in case further, direct financing was envisaged. It is also consistent with the stated goals of increasing direct access projects, increasing access for BoP (Bottom of pyramid) private sector projects, and smaller scale private sector projects (as outlined in version 2 of the strategic programming document, p. 35 and p. 73 respectively)/

IX. Policies and Instruments

A. Further policy development and addressing policy gaps

In the strategic programming discussion during the First Replenishment Consultation Meeting in Oslo, and the second version of the strategic programming paper presented there, we missed a commitment to the GCF setting in its programming -- and influencing through its growing network of 84 accredited entities, including NDAs -- new, better, and best practices in consideration and integration of human rights in climate investments, including through forward-looking gender and Indigenous Peoples' policies, a strong human-rights centred Environmental and Social Policy (ESP), and a set of independent accountability mechanisms that safeguard zero to low tolerance for failure to comply with these policies both in the GCF internally as well as with its counterparties/implementation partners. Over the past year, the GCF has approved critical rights-based policies including the ESP and Indigenous Peoples Policy as well as the Procedures and Guidelines for the Independent Redress Mechanism that present emerging best practice in climate finance. A further upgrade of the GCF's gender policy is likewise needed to ensure that the GCF, as a 21st century climate fund, operates with a 21st century understanding of gender identities and intersectionalities. The strategic programming document should fully embrace these policies and look to both build upon them, secure and recommend their approval, and ensure their full implementation.

Unfortunately, during the IRM, CSOs committed to actively monitoring GCF project proposals and their subsequent implementation at both the Fund and the country levels have seen that environmental and social safeguards and indigenous peoples' and gender policy requirements are not always fully met in project proposals, and project proposals were approved despite lacking those requirements by adding instead a related condition to the approval decision. It is thus important that the GCF in pursuing a programming for impact approach during R-1 makes a clear commitment that no project that lacks sufficiently articulated

ESSs, gender, and indigenous peoples implementation commitments should move forward. The GCF's proposal approval process should be restructured to allow for such proposals to be sent back for resubmittal with the identified deficits corrected.

In discussing policy gaps that need to be closed, we would also highlight the need to complete the GCF's Environmental and Social Management System (ESMS) including the development of the GCF's own environmental and social safeguards to ensure GCF programming during the First Replenishment Period maximizes its beneficial impacts. This should include a set of strengthened stakeholder engagement policies that addresses not only observer engagement at the Board level and in Board proceedings, but also at the local, country, and regional level throughout the implementation of GCF supported projects and programmes beginning with program design and continuing throughout.

There is also a need to maintain a coherent application of GCF's policies. In case of conflict in the application of policies in a particular case, policy provisions have to be applied in line with the principles of the UNFCCC, and international agreements that protect human rights.

As the board is moving forward in determining a decision-making making process in the absence of consensus, CSOs support a procedure having one member, one vote while adhering to the principles of operating as 'one board' with consensus kept as the primary mode and ensuring that in addition to a 2/3 overall majority, a decision cannot be made without a simple majority of both developing and developing country members in favor, so as to ensure decisions have resonance and authority across all constituencies.

While we remain supportive of efforts to develop a more robust way of understanding the potential and impact of projects, we do want to reiterate the importance of such approaches -- like the pilot of indicators for the investment criteria -- being part of developing a cohesive system, where the Results Management Framework and Investment Criteria Indicators are aligned. We look to the strategic programming document to set forth a vision where criteria and measures are complementary, robust, and contribute to a deeper understanding of proposals and implemented projects rather than reducing them to components. With respect to the further development of the investment framework during R-1, this would speak to the need to maintain a focus on the protection of vulnerable communities, the elaboration of a set of multiple economic, social, other environmental benefits as part of the larger sustainable development context in which the planned investment takes place, as well as upgrading and improving the integration of human rights-based principles on gender and Indigenous peoples to ensure quality programming for impact. Likewise in efforts to further evolve the GCF's results management framework a current focus on quantitative measurements of effectiveness and efficiency must be better supplemented with qualitative indicators focused on understanding the GCF's portfolio impact on sustainable development, multiple benefits and serving the most vulnerable populations. An important starting point could be developing the methodology for the portfolio level indicator for sustainable development that is already included as a placeholder in the performance measurement framework for mitigation.

B. **Diversified use of instruments and GCF-structured products**

We are concerned that a number of the proposed new programming options elaborated in version 2 of the strategic programming document would fundamentally alter the nature of the GCF as a fund under the UNFCCC and make it more like a development bank. Potential directional shifts of this magnitude merit broader engagement of all GCF stakeholders and not just the views of potential contributors. A proposed co-investment framework with a focus on institutional investors raises a number of red flags, as does the mention of “policy loans,” which are more suitable for a multilateral development bank than a Fund under the UNFCCC**.**

There are a number of suggested diverse instruments and GCF-structured products, on which CSOs active in the GCF have differentiated views regarding their utility to allow the GCF during R-1 to pursue a programming with impact approach. They include, *inter alia,* the following:

- **Local currency lending** -- This is a welcome proposal: the possibility that the GCF could assume currency risk is a useful tool that could be consistent with its objectives, helping various projects to become viable, and strengthening domestic markets.

- **Climate bonds --** There is a global need for robustly certified climate bonds (with many green bond issuers performing ‘greenwashing’ instead of rigorous certification) and there may be a role for the GCF to support bond programs as part of its overall funding portfolio. However, the GCF should stay away from issuing its own ‘green climate bonds’ as it lacks the track record or capacity, and the pursuit of a credit rating that could back attractive bonds would compromise the GCF’s goal of providing accessible climate finance for the countries most vulnerable to climate change.

- **Equity investments** -- Currently, approximately 9 percent of allocated GCF funding is in the form of equity. The GCF invests in equity funds, which invest directly in projects or in other equity funds. Equity financing is an established part of the GCF “toolkit”, and there are many cases (e.g. in nascent renewable energy markets) where it is a more appropriate funding vehicle than debt financing. However, whether or not equity finance becomes a more central part of the GCF funding mix depends on other decisions (e.g. sectoral and regional focus, or changes in the overall investment framework). The GCF should also ensure that concerns about the transparency and accountability of equity financing are addressed. This must include publishing details of all sub-projects and adopting a mechanism for public scrutiny of higher risk sub-projects in advance of their approval in line with the implementation requirements for the GCF’s pro-active information disclosure policy, and as confirmed by recent Board decisions. The PSF in our view should not act as a direct equity investor at this time.

- **Insurance** -- The GCF should consider funding proposals for climate risk insurance on their merits, but there is no compelling case to establish a specific modality (p.44) or RfP (p. 35). Investment in universal social protection systems, risk pooling through the creation of agricultural cooperatives, or directly investing in climate resilience may prove more effective than insurance products in many cases, so the GCF should be wary of reinforcing a “supply driven” approach where climate insurance is oversold as the solution. More broadly, there are likely to be a number of risk pooling measures on both the adaptation and mitigation sides (for example, an instrument like the Green Aggregation Tech Enterprise (Gate) scheme to de-risk mini-grid financing) beyond conventional “insurance” products.

- **Guarantees** -- The commitment to a new guarantee product or partnerships is welcome although, as in other aspects, “effectiveness” requires more than just “efficiency” (p.43).

X. Conclusion and Outlook

The GCF's first replenishment is critical and must send important signals commensurate with the GCF's key role in the global climate finance architecture and for the implementation of the Paris Agreement. It needs to not only demonstrate the continued commitment to the GCF through significantly scaled-up contributions from developed countries, but should also demonstrate the GCF's commitment to fulfilling its mandate to support lasting transformational shifts in developing countries in line with the Governing Instrument. Climate finance is a critical piece of the Paris Agreement and the GCF should capitalize on its first replenishment to demonstrate the role it can and should play in delivering climate finance investments in both quantity and quality.

Thank you for the consideration of our joint CSO submission. We stand ready to follow up with more information or respond to any questions as the next iteration of the strategic programming document is developed for consideration by the GCF Board and potential contributors during the replenishment process.

Submission on April 26, 2019 by:

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This submission was compiled and written by Liane Schalatek, based on input and contributions provided by members of the Civil Society Organization (CSO) Working Group on Strategic Vision 2019, acknowledging in particular the strong written inputs by CSOs in support of this submission (in alphabetical order):

- Aksi! – For gender, social and ecological justice, Indonesia
- Asia Pacific Movement on Debt and Development (APMDD), Philippines
- Both Ends, The Netherlands
- Center for International Environmental Law (CIEL), USA
- Heinrich Böll Stiftung North America, Germany/USA
- Indigenous Peoples' International Centre for Policy Research and Education (Tebtebba), Philippines
- Institute for Policy Studies, USA
- Pivot Point, USA
- Rainforest Foundation Norway, Norway
- Women's Environment and Development Organization (WEDO), USA

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

- ActionAid USA, USA
- Association for Water and Rural Development (AWARD), South Africa
- Bank Information Center, USA
- Care International
- Civil Society Network on Climate Change, Malawi
- Friends of the Earth US, USA
- GenderCC-Southern Africa-Women for Climate Justice, South Africa)
- Hivos,The Netherlands
- Humana People to People, Zimbabwe
- International Trade Union Confederation (ITUC)
- Nepal Federation of Indigenous Nationalities (NEFIN), Nepal
- Third World Network (TWN), Malaysia
- Transparency International (TI)-Korea Chapter, South Korea