

Heinrich Böll Foundation North America Commentary on GCF/B.08/19: “Gender Policy and Gender Action Plan”

Submitted by Liane Schalatek (liane.schalatek@us.boell.org)

In Bali, Board decision B.06/07 requested the Secretariat to prepare a draft gender policy and action plan. It also mandated the Secretariat to integrate gender considerations into draft policy documents and documents containing operational modalities on an ongoing basis.

While the consideration of a draft gender policy and action plan had to be delayed due to the focus on the essential policy requirements for initial resource mobilization at the 7th GCF Board meeting, some important Board decisions in Songdo considered gender. This included implicitly, in some Annexes, the decisions on accreditation (decision B.07/02) and on the approval process (decision B.07/03) and explicit references in the decision texts of the results management framework (decision B.07/04) and the investment framework (decision B.07/06).

In Barbados, the Board is to consider and adopt the GCF’s Gender Policy and request the finalization of a GCF Gender Action Plan for consideration at its 9th meeting (GCF/B.08/19). It is also asked to adopt further operational modalities on accreditation (GCF/B.08/2-6), the performance measurement frameworks (GCF/B.08/07), the investment framework (GCF/B.08/20), the simplified approval process (GCF/B.08/22) and private sector work with local private sector entities, including MSMEs (GCF/B.08/14 and 40), which are likewise of crucial importance for a gender mainstreaming approach in the GCF, even if not the focus of this commentary.

Gender Policy and Action Plan (GCF/B.08/19)

The paper is very helpful in laying out the experience of other climate funds and development institutions in implementing gender mandates and policies, having clearly benefitted from a broader consultation process since April 2014. It premises the Gender Policy on six fundamental principles. These however, while important, are not taken up explicitly in Annex II, the actual gender policy to be approved. This should be remedied.

Likewise, many of the useful elaborations – and commitments – in the document in six identified priority areas, for example the important recommendation that in the project selection and project approval process additional weight should be given to projects with well-designed gender elements (section 5.5., para. 26), are not taken up in the actual policy in Annex II. These recommendations will just be “taken note” of, but will not have the force of a decision.

It is therefore crucial that the draft gender action plan, which will be only finalized and considered for decision at the 9th GCF Board meeting and should be further elaborated and refined through a consultative process

- Establishes clear mandates and accountability for specific actions necessary for the implementation of Fund’s Gender Policy; and
- Does so in conjunction with the Board’s Work Plan for 2015 and by ensuring that gender considerations are mainstreamed into its operational activities and policy guidance, such as the development of specific guidelines and toolkits.

On the draft gender policy specifically (Annex II, GCF/B.08/19), there are **a few issues that need some correction and revision** (see the section further below that for recommendations for textual edits), before it should be adopted. Specifically:

- In the section providing key definitions for gender-related term, the policy should embrace a broader definition of gender that also acknowledges **gender identity** and the inequalities and vulnerabilities suffered by those whose gender identity and biological sex are not congruent (Annex II, para 3).
- In the section on the main objectives of the gender policy, **a focus on “efficiency” (Annex II, para. 5(a)) is misguided** and should be replaced with a reference to the effectiveness and sustainability of outcomes. Many of the actions that the Fund will pursue in efforts to address gender equality could be smaller scale, with disproportionately higher transaction and administration costs, but more effective in contributing to sustainable gender-responsive climate actions.
- The policy is correctly focused on the often disproportionately higher adaptation needs of women (addressing vulnerabilities and building resilience), but **neglects to highlight in its objectives and commitment sections the crucial capabilities of women to address climate change through direct actions (the mitigation focus), including as private sector actors**. Women are not just victims of climate change, but important change agents in the fight against it. This has to be reflected particularly also in the Fund’s investment and performance measurement frameworks.
- The policy uses the moniker “climate change-induced vulnerabilities” repeatedly. This formulation is confusing and seems to imply that the Fund can only address gender inequalities for which a causal link with climate change can be established. In fact, underlying structural gender inequalities (regarding access to power or resources for example) exist independent of climate change, but aggravate women’s vulnerabilities to climate change and restrict their abilities to address it. This term should be stricken and replaced in some instances by “exacerbated by climate change” instead.
- The policy’s section dealing with accountability focuses on gender indicators in the results and performance measurement framework (= specific Fund aggregate indicators for gender, as suggested in section 5.4 of the main document, which however only looks at *ex ante* intent), **but too little on “gender-sensitive” indicators in specific mitigation and adaptation impact and outcome areas**. Here a mainstreaming focus is needed to ensure that not the actions itself, but the outcomes and gender equality impacts of the portfolio of Fund actions are counted. Likewise, while a commitment to gender-disaggregated data collection is an important step, it does not replace a careful consideration of what is counted in performance measurement systems. For example in adaptation, **the number of beneficiaries is less important than a relative change in their adaptive capacity**.
- Lastly, on its sections on accountability (section 4.3) and competencies (section 4.5), the policy must make a clear commitment that the **implementation of the gender policy is a core responsibility of the Secretariat that cannot be outsourced**. While the appointment of a senior staff/manager with competencies on gender and climate change (Annex II, para.15) is an important first step, one person will not be able to ensure due diligence oversight on gender integration over project proposals, without corresponding expertise and staff support in other Secretariat divisions. Recruitment of future staff should focus on selecting applicants who combine specific technical expertise, for example on financial instruments and private sector engagement, with social and gender competence.

The text excerpts below of Annex II: Green Climate Fund Gender Policy, reflect the suggested text changes in section II on “Rationale”, section III on “Objectives” and in the actual text of the “Gender Action Policy” in section IV.

Annex II: Green Climate Fund Gender Policy

[...]

II. Rationale

5. There are three compelling reasons for the Fund's mandate on gender sensitivity:
 - (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-sensitive 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 change¹⁵; and
 - (c) ~~Climate change-induced~~ gender inequality, exacerbated by climate change, is linked, as in other development areas, to vulnerability and risks¹⁶. Women's greater vulnerability to climate change stems from gender norms and discrimination that result in imbalanced division of labour, lower income, and lesser livelihood opportunities; less access and control over land and other productive assets; fewer legal rights; lesser mobility and less political and professional representation¹⁷.

III. Objectives

5. The Fund's gender policy has five main objectives:
 - (a) Ensure that by adopting a gender-sensitive approach, the Fund will achieve greater and more sustainable and effective climate change results, outcomes and impacts, ~~in an efficient manner~~;
 - (b) Ensure that women and men will have an equal say in and equally benefit from activities supported by the Fund;
 - (c) Address assessed potential project/programme risks on women and men associated with adaptation and mitigation activities financed by the Fund;
 - (d) Contribute to reducing the gender gap of ~~climate change induced~~ social, economic and environmental vulnerabilities exacerbated by climate change; and
 - (e) Build women and men's resilience and ability to address climate change.

IV. Gender Action Policy

6. The Fund's Gender Action Policy consists of the following elements:

4.1 Commitment

- (a) By adopting a gender-sensitive approach in its mandate on climate change, the Fund commits to contribute to gender equality, as enshrined in international and national constitutions and other human rights agreements¹⁸.
7. The Fund thereby also commits to:
 - Understand the socio-cultural factors underlying ~~climate change related~~ gender inequality, which is exacerbated by climate change, and the potential contribution of women and men to

societal changes to build climate resilience and address climate change;

- Adopt methods and tools to promote gender equality and reduce gender disparities; and
- Measure the outcomes and impacts of its activities on women and men's resilience and ability to address climate change¹⁹.

4.2 Comprehensiveness, in scope and coverage:

8. The Fund applies its gender policy in-principle to all its activities, whether implemented by public institutions, non-governmental organizations or the private sector. The policy is applicable to all countries, while taking into account different national realities, capacities and levels of development and respecting national policies and priorities and mindful of international human and women's rights obligations.

4.3 Accountability

9. 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 indicators as well as gender-sensitive impact and outcome indicators are included in the results management and performance measurement frameworks (GCF/B.08/07).

[...]

4.5. Competencies:

15. The Fund strives to reach gender balance in the appointments of its Board members and Secretariat management and staff. The Secretariat appoints a senior staff/manager with competencies on gender and climate change to lead the implementation of the policy; the senior staff will report to the Director of Country Programmes. This is to be expanded to a gender focal point in each of the Secretariat's divisions. The Secretariat also strives for the relevant gender and climate change competencies to be included in the Accreditation Panel, Investment Committee, Risk Management Committee and Private Sector Committees²⁴, as well as amongst technical advisers²⁵.

[...]

4.6. Resource allocation

19. The Fund's resource allocation for adaptation and mitigation projects and programmes contributes to gender equality. The Fund seeks to ensure that its projects and programmes support initiatives addressing the inequity of climate change impacts and provide gender-sensitive solutions to climate change mitigation, adaptation or readiness. When necessary to correct for climate-change-induced gender inequality to the detriment of women, the Fund will target funds to support women's climate change adaptation and mitigation initiatives. The Fund's readiness and preparatory support work-programmes enable NDAs, IEs and EEs to meet the Fund's gender policy.

[...]