



From Innovative Mandate to Meaningful Implementation:

Ensuring Gender-Responsive Green Climate Fund (GCF)
Projects and Programs

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From Innovative Mandate to Meaningful Implementation: Ensuring Gender-Responsive Green Climate Fund (GCF) Projects and Programs¹

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1. Introduction – GCF With Signaling Effect Beyond “Business as Usual”

Climate change is already severely affecting people in developing countries, and men and women differ in their ability to build resilience against and address climate impacts. Women experience negative outcomes disproportionately largely due to factors that render them more vulnerable and restrict their agency to mitigate climate change, including persisting gender inequalities, restrictive cultural norms and practices and a lack of access to resources, legal rights or political participation and decision-making.* In order to be more effective and efficient, climate finance mechanisms must be responsive to the gender dimension of climate change. The scarcity of public finance for climate action makes gender responsiveness (and the gains in effectiveness and efficiency that gender responsiveness will promote) even more critical. Experience from development finance underscores that gender inequality leads to suboptimal economic outcomes because it neglects the role of women as drivers of change and innovators and effective implementers in their families, communities and as entrepreneurs. The World Bank and other development finance actors have recognized the goal of actively promoting gender equality as “smart economics,” and have warned that not taking full advantage of women’s skills, knowledge and experience comes at a high economic cost.² Many women are already engaged in economic sectors related to climate adaptation and mitigation efforts – including agriculture, renewable energy, and forest management. Supporting women’s activities through climate financing will lead to better results from initiatives in these sectors.³

In addition to this business case, a human rights case must be made: gender mainstreaming of climate financing instruments is an acknowledgement of women’s rights as unalienable human rights and a matter of equality and fairness and non-discrimination. Almost all country parties to the UN Framework Convention on Climate Change (UNFCCC) have existing obligations under the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) and other human rights instruments.⁴ Ignoring women as key stakeholders in climate financing will not only violate women’s human rights, but also lead to suboptimal use of climate funds.

Unfortunately, many climate funds still have a long way to go from initial gender awareness and some integration of gender aspects into their project cycles to truly gender responsive operations at the level of the fund and in-country project and program implementation. Can the Green Climate Fund (GCF) set new climate finance best practice in gender-responsive operation and implementation? This paper analyses the GCF’s potential, as well as challenges and obstacles to fulfilling this role and how they could be overcome.

The Green Climate Fund (GCF) is a new multilateral climate fund established under the UNFCCC by Cancun Decision 1/CP.16 as an operating entity of the Convention’s Financial Mechanism, which is “ac-

* This paper was written as a background paper for an Expert Group Meeting (EGM) organized by UN-Women, UN DESA, and the UNFCCC Secretariat on “Implementing gender-responsive climate action in the context of sustainable development” in Bonn, Germany from October 14-16, 2015. The views expressed in this paper are those of the author (liane.schalatek@us.boell.org) and do not necessarily represent those of the United Nations. The author is grateful for comments received by UN-Women and UN DESA on earlier drafts of the paper as well as feedback and comments received from the EGM in Bonn.

countable to and function[s] under the guidance of” the UNFCCC Conference of Parties (COP).⁵ It is governed by a Board of 24 members, composed of 12 members from developed and 12 from developing countries and with an independent Secretariat located in Songdo, Republic of Korea. Efforts to fully operationalize the GCF have been ongoing since a first Board meeting in August 2012. The GCF is expected to start funding projects and programs by November 2015.

With an initial resource mobilization of US\$ 10.2 billion pledged from 37 countries, including eight developing countries, of which US\$ 5.8 billion have been received in form of signed contribution agreements by mid-October 2015⁶, the GCF has become the largest multilateral climate fund to assist all developing country UNFCCC parties with necessary mitigation and adaptation actions. For developing country parties to the UN Framework Convention on Climate Change (UNFCCC), the GCF is the cornerstone for the fulfillment of the 2009 Copenhagen pledge of developed countries to transfer US\$ 100 billion per year by 2020 to assist developing countries with their climate actions. The GCF and the generosity of its future replenishment cycles will also be seen as the institutional guarantee for a successful implementation of Parties’ commitment under a new global climate treaty to be sealed at COP 21 in Paris in December 2015.

Tasked to make an ambitious global contribution to combating climate change, the GCF is to “promote the paradigm shift towards low-carbon and climate resilient development pathways”⁷. How the GCF defines the constituent elements of such a paradigm shift and how it ensures that it incorporates the gender responsiveness of its financing as a permanent shift beyond “business as usual” – namely by putting in place the operational policies, procedures and guidelines safeguarding men and women’s equal rights and participation in deciding on GCF projects and programs and allowing them to benefit equally – is therefore of fundamental importance. Success or failure in the GCF’s endeavor to mainstream gender considerations into its operations will have an important signaling function for the broader global climate process and the way global climate commitments are implemented.

2. Where does the GCF currently stand with respect to gender-integration?

So where does the GCF currently stand with its efforts to integrate gender considerations into its operational policies, procedures and guidelines? Over the course of the ten Board meetings held since August 2012, the GCF Board in collaboration with the GCF independent Secretariat has made some important policy decisions and advanced key operational procedures that integrate gender perspectives to varying extents. Those include both efforts for an explicit GCF gender policy, as well as the parallel mainstreaming of gender considerations into operational procedures as they were developed and approved by the Board.

2.1. Mandate of the GCF Governing Instrument

The GCF started out with a directive to consider gender in its operations in its organizing charter, the GCF Governing Instrument (GI). This contrasts with other existing international climate funds such as the Kyoto Protocol Adaptation Fund, the World Bank-administered Climate Investment Funds (CIFs) or the Global Environment Facility (GEF), which like the GCF is an operating entity of the UNFCCC financial mechanism. The GCF is thus the first climate fund obligated to integrate gender aspects from the outset of its operations, while other climate funds have brought in gender considerations only retroactively and often not (yet) comprehensively – a shortcoming that for example both the GEF and the CIFs try to address with new recent multi-year gender action plans. The GCF has thus the opportunity as well as the challenge to “get it right” from the very beginning – a process fraught with promise, progress and peril and dependent on the prioritization of some key actions.⁸

In the GCF most importantly, its governing instrument includes a mandate to maximize the impact of GCF funding for mitigation and adaptation while “taking a gender-sensitive approach”, thus anchoring a gender mainstreaming instruction for the fund prominently among the fund’s objectives and guiding principles.⁹ Four additional key references to gender and women in the governing instrument address the goal toward gender balance of the GCF Board and among its Secretariat staff and demand the engagement of women as relevant stakeholders in the design, development and implementation of the strategies and activities to be financed by the GCF.¹⁰

While the gender balance of GCF Secretariat staff and the GCF Board is only one contributing factor to the promotion of gender equality in GCF finance provision, it is nevertheless a powerful outward symbol of how serious the gender-sensitive approach is taken by the institution itself. Despite the stated emphasis on promoting gender sensitivity, both the GCF Board and Secretariat staff have room for improvement. The 24-member Board (whose exact composition shifts constantly as government officials are replaced or regional constituencies rotate seats) has never had more than 25-30 percent of the Board’s membership¹¹ occupied by women. And although the Secretariat, which is headed by a female executive director, Hela Cheikhrouhou, in its most recent report to the COP detailed its current staff composition to be 52.5 % male and 47.5 % female with 57.5% of the staff coming from developing countries¹², these numbers do not detail the gender distribution of the GCF staff among professional grades and mask the fact that the female staff is represented to a higher degree in the administrative and support staff and among junior level professional staff. For example, looking at the descriptions of the functions and backgrounds of GCF Secretariat staff of 58 people detailed on the GCF website earlier in the year, five males are in leadership functions versus one female; among staff whose titles include “officer”, “specialist” or “head of” 20 staff are male versus ten female; in contrast, among lower level staff positions fulfilling assistant, administrative or associate professional positions, male staff members hold nine positions, while females hold 13 of these positions.

Table 1: Gender Composition of GCF Secretariat Staff (as of early 2015, staff of 58 plus Executive Director)

Job Title	Female-held position	Male-held position	Balance in percentage female : male
Executive director	1	0	100.0 : 0
Secretariat leadership positions	1	5	16.6 : 83.3
Higher level professional staff (“officer”, “specialist”, “head of...” in job title)	10	20	33.3 : 66.6
Associate Professional Consultants	5	3	62.5 : 37.5
Administrative Assistant Consultants	1	5	20.0 : 80.0
Professional staff with “assistant” in job title	7	2	77.8 : 22.2
Total staff (without ED)	24	34	41.4 : 58.6
Total staff (with ED)	25	34	42.4 : 57.6

Source: GCF Secretariat (2015). Meet the People behind the Fund. Retrieved from: http://issuu.com/greenclimatefund/docs/meet_the_people_behind_the_fund?e=16716326/12298643.

2.2. The Path toward a GCF Gender Policy and Action Plan

Despite a strong mandate for a gender-sensitive approach in the GCF governing instrument, it took the Board until its 9th meeting (or 2 ½ years after the start of the GCF operationalization efforts) to adopt a GCF Gender Policy and Action Plan with decision B.09/11 in March 2015.

Already at the GCF inaugural Board meeting in August 2012, the Board member representing the Danish/Dutch seat had asked to include gender considerations into the Board's work plan and offered analytical support in form of an analytic paper exploring how to operationalize a gender-sensitive approach in the GCF. Although several Board members in meetings that followed made some references to gender in Board discussions, it was only at the 4th meeting in June 2013 that an informal non-paper commissioned by the Dutch government was presented¹³ and the issue was addressed impromptu under "other business." The Board Co-Chairs promised to put it formally on the agenda of the next Board meeting. Originally relegated to "other business" on the agenda of the GCF's 5th meeting, strong Board member support for more immediate action resulted in the adoption of decision B.05/22, mandating the Secretariat to formally present options for a Fund-wide gender-sensitive approach at the next meeting in Bali in February 2014, including through consultations with stakeholders.¹⁴

Finally formally on the agenda of the 6th GCF Board meeting, Board members adopted decision B.06/07 after a discussion in which the importance of integrating gender considerations in GCF operations was highlighted by every speaker. The decision requested the development of a GCF gender policy and action plan with the participation of stakeholders, but also mandated in parallel the integration of gender considerations in GCF policy documents and operational modalities, thereby stipulating an explicit gender mainstreaming approach and rejecting any attempts to confine gender in the GCF to the parameters of a gender policy only.¹⁵ The latter mandate proved critical, as much of the work of the Board in 2014 focused on the development and approval of a set of policies considered critical for the initial resource mobilization effort of the GCF such as the initial accreditation process or the investment framework. This was to the detriment of a discussion and decision on a draft gender policy and action plan, which was deferred two times and only adopted at the 9th Board meeting with decision B.09/11.¹⁶ Without the mainstreaming mandate of decision B.06/07, key operational policies would have been developed without any gender integration. Nevertheless, it can be argued that an earlier Board decision on a GCF gender policy could have resulted in more comprehensive gender integration into a set of critical earlier GCF policy decisions.

2.2.1. The GCF Gender Policy and its Principles

Board decision B.09/11 adopted both the GCF gender policy¹⁷ as well as a three year gender action plan¹⁸ to guide its implementation. However, the decision text allowed for a national contextualization of the GCF policy and its principles "in line with individual country circumstances" and narrowed the understanding of gender equality "within the context of climate change policies," the same formulation used to secure the COP decision on the Lima Work Programme on Gender¹⁹ as a compromise after one Party's opposition. This has raised concerns, including among civil society advocates for such a policy, that the phrasing could be used as an excuse with reference to a country's cultural practices and gender norms for not adhering fully to the GCF gender policy. Proponents argue that the wording allows for some flexibility in implementation, which could help some countries advance gender equality in nationally owned and supported GCF projects and programs.

The GCF gender policy identifies some key objectives, acknowledging that by adopting a gender-sensitive approach, the Fund will achieve "greater, more effective, sustainable and equitable climate change results, outcomes and impacts in an efficient and comprehensive manner." It highlights its goals

to equally build women's and men's resilience to and ability to address climate change and to ensure "that women and men will equally contribute to, and benefit from activities supported by the Fund." Additionally, the policy indicates that project and programs implemented by the Fund will address and mitigate against potential risks for men and women of Fund activities, including by reducing the gender gap of existing social, economic and environmental vulnerabilities.²⁰

The GCF gender policy consists of six main elements organized around the following principles:

- a. Commitment to contributing to gender equality "as enshrined in international agreements and national constitutions, and other human rights agreements" by focusing on the following: understanding socio-economic factors underlying climate-change exacerbating gender inequality, women's and men's ability to contribute to societal change and address climate change, and the adoption of methods and tools to promote gender equality and reduce gender disparities in climate funding and measure the outcomes and impacts of Fund activities on women's and men's resilience to climate change;
- b. Comprehensiveness in scope and coverage by confirming the application of GCF gender efforts to all its mitigation and adaptation activities;
- c. Accountability for monitoring gender impacts, including through quantitative and qualitative indicators on the level of individual projects as well as on the GCF portfolio-wide outcome and impact level in addition to accountability of GCF management and staff for gender results as well as a process for gender-related complaints and grievances through the GCF independent redress mechanism;
- d. Country-ownership as national designated authorities (NDAs) and focal points, the Fund's counterparts in recipient countries, are informed of the requirement to align proposed projects and programs submitted to the GCF with its gender policy and of Fund requirements for equal opportunities for men and women in stakeholder consultations and decision-making;
- e. Gender competencies of GCF staff, key advisory and decision-making bodies and the promise that GCF readiness and preparatory support can also focus on enhancing the capacity of entities involved in the GCF project cycle to implement the GCF gender policy; and
- f. Resource allocation that contributes to gender equality and women's empowerment, including, if necessary by targeting funding to support women's adaptation and mitigation initiatives specifically in addition to efforts to mainstreaming gender considerations.

2.2.2. The GCF Gender Action Plan with Priority Areas and Targeted Implementation Actions

The GCF gender action plan, likewise approved with Board decision B.09/11, is meant to provide a time-bound three year framework from 2015 to 2017 during which targeted actions are proposed to put the gender policy's six principles into practice in GCF operations. It highlights six priority areas with corresponding implementation highlights, although the decision did not set any indicators for verifying that the identified priority areas are comprehensively addressed. The GCF gender action plan is summarized in the table below:

Table 2: GCF Gender Action Plan 2015-2017 with Priority Areas and Key Implementation Actions

Implementation of Gender Policy	
Priority area	Implementation Action
(a) Governance and institutional structure	1. Approval of the gender policy
	2. Periodic monitoring of the implementation of the gender policy and the gender action plan through review of implementation and evaluation reports
	3. Appointment of a senior social development and gender specialist within the Country Programming Division
	4. Include gender performance in the accreditation requirements related to the Fund's gender policy as well as in the Secretariat's due diligence reviews on project approval and implementation
(b) Administrative and operational guidelines	1. Include in the Fund's Operational Manual guidelines for the GCF external partners, in particular;
	1.1 Guidance for nationally designated authorities (NDAs) and accredited entities on the mandatory socioeconomic and gender assessment at the start of each project/program;
	1.2 Guidance on gender-sensitive project design elements, budgets, results, monitoring and on impact indications, preparation, implementation and the monitoring of institutional arrangements;
	1.3 Guidance on gender-equitable stakeholder consultations; and
	1.4 Guidance on the inclusion of a gender perspective in the application of mandatory GCF environmental and social safeguards.
2. Review and recommend to NDAs and accredited entities toolkits and sourcebooks on gender and climate change mitigation and adaptation, including for specific sectors.	
(c) Capacity-building	Increase the gender sensitivity of the Fund
	1. through gender training and capacity-building for the fund's external partners (NDAs and implementing entities), including through partnerships with other organizations; and
	2. through gender training for the Board and Secretariat staff
(d) Outputs; outcomes and impact monitoring indicators, and reporting	1. Application of gender guidelines in project preparation/design/implementation/monitoring, specifically, integration of gender-sensitivity in the Fund's initial results management framework for both adaptation and mitigation; and
	2. Two specific portfolio indicators to monitor the gender policy implementation Fund-wide (focusing only on quality of entry):
	2.1. Percentage of adaptation and mitigation projects with gender-specific implementation elements
	2.2. Project rating at entry for gender sensitivity as part of a GCF portfolio classification system
(e) Resource allocation and budgeting	1. The GCF approval process may consider giving additional weight to projects with well-designed gender elements
(e) Knowledge generation and communications	1. Assess the implementation of the gender policy and the gender action plan seeking periodic feedback from stakeholders and partners
	2. Making the Fund's commitment to gender equality and information sharing about its gender requirements and procedures a strategic communications activity and an integral part of the Fund's communications plan
	3. Support for knowledge exchange activities on gender and climate change

Source: GCF Board Document GCF/B.09/23, Decisions of the Board – Ninth Meeting of the Board, 24-26 March 2015, Annex XIV, pp.89-91. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201503-9th/23_-_Decisions_of_the_Board_-_Ninth_Meeting_of_the_Board_24_-_26_March_2015_20150416_fin.pdf

2.2.3. Next Steps Forward – How to Secure the Comprehensive Implementation of the GCF Gender Policy and Action Plan

According to GCF Board decision B.09/11, the adopted gender policy and gender action plan are to be updated within a year after a new senior gender and social development specialist, the key staff anchor tasked with overseeing the implementation of the gender policy and accompanying action plan, who was hired in the fall of 2015, had a chance to solicit input from civil society organizations accredited with the GCF and review the policy. The senior gender and social specialist is to report to the country programming director, who oversees the interactions with recipient countries NDAs and focal points and is within the Secretariat in charge of overseeing the accreditation of GCF implementing entities (IE) and intermediaries and then monitor their performance in implementing GCF-funded adaptation and mitigation project and programs.

While this placement with a focus on implementation partners makes sense, it also highlights the danger that the gender mandate of the Fund is seen primarily as a responsibility to be outsourced down the implementation chain and isolated within one specific division of the GCF Secretariat, instead of being perceived as a core responsibility of the entire GCF Secretariat. It is, for example, not necessarily assured that the GCF gender and social development specialist will have the institutional clout and reach to influence the processes and day-to-day operations of other GCF Secretariat divisions. For example, influencing divisions like its Private Sector Facility, which will structure the Fund's financial interaction with private sector actors, and the mitigation and adaptation division, where sector-specific adaptation and mitigation assessments are done, may prove challenging. Both areas are crucial for a true gender-mainstreaming approach in the GCF. For this very reason, CSO observers had asked for the senior gender and social development specialist to be reporting directly to the Fund Executive Director to ensure that gender is perceived and respected as a cross-cutting task across the programmatic divisions within the Secretariat.

Ultimately, it will be the task of the GCF Executive Director to send the message to all Secretariat staff that the promotion of gender equality is a core task of the Fund's understanding of promoting paradigm change in climate actions and to hold staff accountable for their commitment to integrating gender in their work, including through staff reviews. Staff commitment needs to be supported through regular gender-specific capacity building efforts and future staff recruitment should focus on selecting applicants that combine specific technical expertise, such as the ability to structure financial instruments, with social and gender competence. Only then will the GCF Secretariat be able to not only provide due diligence oversight on gender integration in project proposals and its follow through in implementation but also provide targeted capacity building support and guidance on gender issues to implementing partners and national Fund counterparts where needed.

Key recommendations:

- Top GCF management should send the message to all GCF Secretariat staff that the promotion of gender equality is a core task of the Fund to achieve its mandate of promoting paradigm change in climate actions;
- GCF Secretariat staff should be held accountable for their commitment to integrating gender in their work, including through their work plans and regular staff performance reviews;
- GCF Secretariat staff commitment to gender equality must be supported through regular gender-specific capacity building efforts in order to enhance staff ability to provide due diligence oversight on gender integration in project proposals and its follow through in

implementation;

- GCF Secretariat staff must be enabled to provide targeted capacity building support and guidance on gender issues to GCF implementing partner and national counterparts where needed; and
- Recruitment of future GCF staff should focus on selecting applicants combining specific technical expertise with social and gender competence.

2.3. Status quo of Gender Integration in Key GCF Operational Policies and Procedures

GCF Board decision B.06/07 from February 2014 mandated the integration of gender considerations into Fund operational policies and procedures as they were developed for Board approval even in the absence of a Board decision on a separate elaborated GCF gender policy and action plan (which was delayed for close to a year). The year 2014 saw the development of key operational policies and framework as part of the essential requirements for the Fund to begin its initial resource mobilization efforts mid-2014.²¹ Most prominently, these included initial frameworks for accreditation of GCF implementing entities and intermediaries and for investment decision-making with investment criteria and relevant sub-criteria and benchmarks. The policies also presented separate results management and performance measurement frameworks for adaptation and mitigation measures, which integrated gender aspects to some extent in order to fulfill the GCF mandate for a gender-sensitive approach.

2.3.1. Guiding Framework for Accreditation

In February 2014, Board decision B.07/02 established the guiding accreditation framework for the GCF, which lists coherence with the Fund's gender policy as one of its guiding principles.²² Subsequent Board decisions B.08/02 and B.08/03 approved a fit-for-purpose accreditation approach, which tailors accreditation requirements to the size, risk and financial complexity of the projects/programs that entities aim to implement for the GCF, and allowed for the fast-track consideration of entities already accredited with the GEF, the Adaptation Fund and the European Union's Development Cooperation Directorate General (EU DEVCO).²³ Applicant entities have to prove their capacity to comply with the Fund's environmental and social safeguards (ESS)²⁴, basic fiduciary standards with varying sets of specialized fiduciary standards, and the Fund's gender policy. This is irrespective of whether they are national, international or regional public or private entities and whether they are seeking international or direct access to GCF funding (the latter meaning without the assistance of a multilateral intermediary agency). The commitment and capacity to fulfill the GCF gender policy is thus a mandatory condition for GCF accreditation and is not affected by the possible project size ranging from micro (up to US\$ 10 million in total project funding) to large (over US\$ 250 million in total project funding) and the risk category (with C for no risk to A with highly likely environmental and social impact risk) for which the entity applies for accreditation.

A six-member Accreditation Panel assesses applicant entities' capacity to comply with these policy requirements and provides a summary report of the assessment to the Board with the recommendation for approval, including listing conditional requirements. Each summary report for an individual accreditation applicant provides a separate section detailing whether the entity has its own gender policy or action plan, has the internal competencies and procedures (for example in the entity's own environmental and social management system) to comply with the GCF gender policy's principles and can demonstrate experience in implementing activities addressing the gender dimension of climate change actions. By October 2015, the GCF has accredited a diverse mix of 20 national, regional and

international implementing entities and intermediaries which range from the World Bank with its own gender policy and numerous dedicated staff (accredited for large category A projects) to a small national agency like the Centre de Suivi Ecologique (CSE) from Senegal, which is in the process of codifying its experience in implementing gender-responsive adaptation projects and which is accredited for micro category C project). The accreditation panel in its assessment of applicants recommended for Board approval at the GCF's 9th and 10th Board meeting noted in several instances that the applicants lacked an own elaborated gender policy and made the development of such a policy for example an explicit condition for the accredited entity before it is allowed to submit its first project/program proposal for GCF funding.²⁵ At its 11th meeting in early November 2015, the GCF Board is set to accredit another nine implementing entities and intermediaries, bringing the total number of GCF accredited entities to 29 just before COP 21.²⁶

There is a fear that national applicants for accreditation applying for direct access to GCF funding, which often lack codified documentation of their implementation experience and might not have elaborated ESS and gender policies on the book, might be put at a disadvantage vis-à-vis multilateral organizations applying under international access. Readiness and preparatory support for national entities to fulfill GCF accreditation requirements, including their ability to comply with the Fund's gender policy, are therefore essential pre-accreditation to be followed by continued capacity building support and guidance from the GCF Secretariat with respect to gender during project/program preparation and implementation.

Beyond accreditation as the first step, it will be crucial for the GCF Secretariat to further strengthen its internal gender competencies in order to guarantee due diligence oversight on a growing number of GCF accredited entities (AEs) and their individual follow through on gender-responsive implementation of GCF funding in projects and programs under their respective management.

Key Recommendations:

- Strengthen the capacity of national and regional entities applying for GCF accreditation to fulfill accreditation requirements, including their ability to comply with the GCF gender policy, through targeted measures as part of readiness and preparatory support;
- Further strengthen the gender competencies of all GCF Secretariat staff in order to
 - Provide capacity building support and continued guidance with respect to gender issues during project/program preparation and implementation; and
 - Guarantee due diligence oversight on a growing number of GCF accredited entities and their individual follow through on gender-responsive implementation of GCF funding in projects and programs under their respective management.

2.3.2. Investment Framework

The GCF investment framework was adopted with decision B.07/06 in May 2014 with investment guidelines composed of a set of six overarching investment criteria (impact potential, paradigm shift potential, sustainable development potential, needs of the recipient, country ownership, and efficiency and effectiveness) with 25 relevant coverage areas.²⁷ These will be used by an independent six-member technical advisory panel (iTAP) using a scale of low/medium/high in assessing funding proposals and recommending them for Board approval. The investment decision also made explicit reference to Board decision B.06/07 on operationalizing a gender-sensitive approach to GCF funding by tasking the

Board's Investment Committee to take gender into account in defining activity-specific sub-criteria and related assessment factors such as indicators and benchmarks. Gender-specific language is included as part of two coverage areas, namely "gender-sensitive development impact" (under the criterion on sustainable development potential) and "vulnerable groups and gender aspects" (under the criterion on needs of the recipient), but not referenced under the criteria of GCF impact potential and paradigm shift potential – although arguably a truly gender-sensitive approach in GCF funding with gender-equitable multiple benefits for people most in need does signify a paradigm shift over climate funding "business-as-usual."

Board decision B.09/05 then fleshed out the investment guidelines further by adding activity-specific sub-criteria and assessment factors such as indicators to guide the selection of project and program proposals for approval. It expanded the consideration of gender aspects in proposal assessment by asking for a gender-differentiated look at potential social and economic co-benefits of a project/program under consideration, making suggestions such as including a targeted consideration of female-headed households in assessments of vulnerability. Gender equality as an assessment factor was added to the criterion on "country ownership" to determine whether in the proposal's preparation engagement of civil society organizations and stakeholders was satisfactory. Importantly, for adaptation projects/programs, the impact potential of a proposal will now also be assessed by focusing on the most vulnerable population groups "and applying a gender-sensitive approach" in measures that build adaptive capacity and resilience for populations.²⁸

The GCF investment framework with its criteria, sub-criteria and assessment factors underwent its first test in the lead-up to the 11th GCF Board meeting in early November 2015, as did the competency of the iTAP, including in assessing the Fund's first eight funding proposals²⁹ against the gender considerations specifically incorporated in the investment framework. As with other specialized expert panels in the GCF (for example in the Accreditation Panel), it is crucial to ensure that gender competency is part of the expertise that the panel members represent in addition to efforts for gender balance and diversity of backgrounds and regions. The GCF Board is expected to approve this first set at its November meeting, which will provide a first test-case of how important gender considerations are in the assessment of GCF project/program proposals and their recommendation for Board approval and to what extent the GCF Board is willing – in the case of lacking gender considerations – to either reject a proposal or only approve it subject to a requirement for conditional improvements.

Key Recommendation:

- Ensure that gender competency is part of the expertise that panel members of specialized GCF expert panels, such as the Accreditation Committee and the independent Technical Advisory Panel (iTAP) provide in addition to efforts for gender balance and diversity of backgrounds and regions.

2.3.3. Results Management and Performance Measurement Frameworks

The contribution of GCF project and programs to gender equality and women's empowerment in the aggregate will be verified in the GCF Results Management Framework (RMF). The RMF with separate Performance Measurement Frameworks (PMFs) for mitigation and adaptation projects/programs was developed over several GCF Board meetings starting with decision B.05/03³⁰, which set initial results areas for GCF activities, followed by decision B.07/04 in February 2014, which set the initial logic models for mitigation and adaptation, defining the results chain from inputs to contribution to a paradigm shift.³¹ In addition to setting some first portfolio core indicators (which would aggregate the

results for all GCF mitigation and adaptation activities respectively), decision B.07/04 also stipulated “that the results management framework should take a gender-sensitive approach and that results should be disaggregated by gender where relevant”. Further work on the PMFs at the next Board meeting then tried to find Board agreement on more adaptation and mitigation performance indicators, with decision B.08/07 noting that further refinement of those indicators was needed, methodologies for many indicators still to be refined and that the PMFs’ gender-sensitive approach was also in need of further development.³²

With initial PMFs for adaptation and mitigation still only partially in place, the GCF Secretariat collaborated with gender expert networks in a workshop in April 2015 to improve the gender-responsiveness of the Fund’s performance measurement, specifically by working to integrate gender considerations into impact and outcome indicators in mitigation and adaptation. For the mitigation PMF, there is an opportunity to define indicators on gender-sensitive energy access and power generation and on gender-sensitive low-emission transport specifically. Additionally, there is an opportunity to help define an impact level index indicator for mitigation that considers social, environmental and economic gender-aware multiple benefits to complement its current too narrow emissions reduction focus. The mitigation PMF’s currently looks at emissions reductions as the core indicator in terms of the scale and cost of absolute emissions reduced, including through the leveraging of additional public and private finance. For the GCF adaptation PMF, the opportunity also exists to further define resilience of livelihoods, of basic services as well as disaster risk reduction services and services provided by ecosystems and environments in terms of increasing the equal access of men and women to these resources, with a particular focus on disaggregating households. Gender equality and sector experts recommended that the GCF PMFs take a human rights-based approach by focusing on men and women as rights holders first with corresponding sector requirements stemming from such an approach (e.g. right to water and food). They also urged to include considerations of the gendered dimensions of the care and informal economy into the PMFs by having aggregate indicators that look inter alia at the amount of care work or time spent on care work over time and the redistribution of care work (e.g. using time-use surveys/ data as part of qualitative assessments).³³

While there are opportunities to solidly anchor the gender dimension of results measurement for the GCF portfolio in the PMFs, gender-responsive indicators at the individual project level are currently considered optional as only one of several “co-benefits” that a project/program implementer might choose to measure. GCF project guidelines should reference a mandatory inclusion of gender indicators for each individual project/program or ask project applicants to elaborate why they consider gender considerations not relevant in a specific project/program’s performance measurement. Still further work is needed in the GCF RMF to go beyond just quantifying the number of men and women affected by an individual GCF project/program as its gender outcome (focusing on answering the question of “how many men and women have benefitted from the project”) to assessing also the qualitative change of GCF funded actions in support of gender equality (thereby trying to address “how has the project contributed to changes in the power relationship between men and women and addressed related problems of access, participation and decision-making”).

Key Recommendations:

- Performance measurement in the GCF must take a human rights-based approach by focusing on men and women as rights holders first and take into consideration the gendered dimensions of the care and informal economy;
- GCF project implementation guidelines must reference a mandatory inclusion of gender indicators for each individual project/program or ask project applicants to elaborate why they

consider gender issues not relevant in a specific project/program's performance measurement; and

- The GCF results management framework must go beyond the quantification of gender outcomes by focusing not only on the sex-disaggregation of project/program data, but also by addressing qualitative changes in support of gender equality as a result of GCF funded actions.

2.3.4. Country Ownership – Country Coordination and Stakeholder Participation

The GCF governing instrument stipulates as a guiding principle that “the Fund will pursue a country-driven approach and promote and strengthen engagement at the country level through effective involvement of all relevant institutions and stakeholders”.³⁴ Within countries receiving GCF funding, national designated authorities (NDAs) or focal points are tasked to coordinate a country's funding priorities domestically and ensure its consistency with national climate and development strategies and plans as well as that those priorities are developed with stakeholder participation. A country decides itself which government entity it wants to designate as GCF NDA. As of early October 2015, 136 countries have designated their NDA (usually a government agency) or focal point (a single representative from a government agency), with many countries choosing a ministry of environment or energy, a ministry of planning or economic development, or in some cases a ministry of finance to serve as their country's institutional link to the GCF³⁵. GCF-relevant stakeholders are defined by the governing instrument as “including private sector actors, civil society organizations, vulnerable groups, women and indigenous peoples” who are to provide input and participate in “the design, development and implementation of the strategies and activities to be financed by the Fund.”³⁶

GCF Board decision B.08/10 set guidelines for the establishment of NDAs or focal points³⁷, noting in particular their need to have the “capacity to facilitate and coordinate country coordination mechanisms and multi-stakeholder engagement for country consultations,” including by being able to disseminate in local languages key operational procedures of the Fund, such as its environmental and social safeguards or the requirements of the Fund gender policy. NDAs or focal points are to lead in the development of a GCF country program and they need to actively endorse via a no-objection letter³⁸ every project or program proposal before its submittal to the GCF for consideration and approval. Thus, the level of gender-awareness and capacity of NDAs or focal points (often from the ministries of environment, planning or finance within a recipient country) is crucial for ensuring gender-responsive stakeholder engagement and participatory planning in a developing country receiving GCF funding.

Decision B.08/10 also established some recommendations for country coordination and multi-stakeholder engagement; however, these are relatively weak and left at the level of “initial best practice options” and are thus not made mandatory requirements.³⁹ Countries are “encouraged to design a consultative process through which national climate change priorities and strategies can be defined”, noting that such consultative processes “should be inclusive and seek to engage all relevant actors”, but the text does not reference women as a key stakeholder group explicitly. Civil society observers to the GCF therefore continue work to have the Secretariat issue stronger gender-responsive stakeholder engagement guidelines, for example as central part of an operations manual and an appraisal toolkit for the initial proposal approval process (see related Board decision B.07/03) and to extend the notion of country-ownership beyond its current customary reference to government agencies mainly.

Key Recommendations:

- The GCF Secretariat must work with NDAs and focal points to increase their level of understanding of and capacity for gender-responsive stakeholder engagement and participatory

planning, for example through readiness and preparatory support measures; and

- The GCF Secretariat must improve current weak “initial best practice options” for in-country stakeholder engagement by issuing strong gender-responsive stakeholder engagement guidelines as part of an operations manual and an appraisal toolkit for the initial proposal approval process.

2.3.5. Proposal Approval Process

With decision B.07/03, the GCF Board adopted the Fund’s initial proposal approval process, which outlines the key stages and individual steps of the GCF’s project/program activity cycle.⁴⁰ As outlined in the decision, gender considerations are explicitly referenced during the analysis and assessment of project/program proposals received by the Secretariat, when the Secretariat provides due diligence to ascertain the proposal’s compliance with the Fund’s environmental and social safeguards, its gender policy and financial policies and fiduciary standards. As anchored and mandated in the GCF plan, GCF accredited entities are also required to undertake a “mandatory initial socioeconomic and gender assessment complementary to the environmental and social safeguards process (ESS) [...] in order to collect baseline data” and, for example, to identify and design the specific gender elements, including indicators and implementation and institutional arrangements, of a project or program.⁴¹

However, how gender-responsive a project/program proposal is that the GCF Board approves depends on a number of additional intervention points during the project/program activity cycle, although they are not specifically highlighted in relevant GCF decisions. They include:

- The development and submission of a country’s work program to the Secretariat through a National Designated Authority (NDA) or focal point, for which readiness support from the Fund may be received (stage 0);
- The development and submission of a project/program concept by an accredited entity with feedback by the Secretariat in consultation with the NDA or focal point (stage II);
- The no-objection verification by the NDA or focal point that a funding proposal is in line with its funding priorities for the country (stage III);
- The development and submission of the full funding proposal following an initial mandatory socioeconomic and gender assessment and guided by an appraisal toolkit to be developed by the GCF Secretariat that includes guidelines for multi-stakeholder consultations and engagement in line with performance standard 1 of the Fund’s interim ESS and future guidance of a still to be developed GCF Environmental and Social Management System (ESMS) in stage III;
- The performance assessment of the proposal by the iTAP against activity-specific sub-criteria of the investment framework (stage IV); and
- The Board deciding to either approve, approve with conditions for improvement or modifications, or to reject the project/program proposal (stage V).

Ideally, gender considerations are taken into account during each of these individual steps underscoring that truly gender-responsive GCF project/program funding is only possible if the various actors in its project/program cycle – namely NDAs/focal points, accredited entities, the Secretariat, specialized expert panels and ultimately the Board – see the integration of gender considerations as part of their respective responsibility and contribution. Guidelines, other guidance documents and toolkits prepared by the GCF Secretariat can help in highlighting and clarifying the respective contributions of partners in the GCF project approval process and the Fund’s expectations.

Key Recommendations:

- Integrate gender considerations into the various stages and procedural steps of the project approval process by ensuring that the various actors involved in this cycle -- namely NDAs/focal points, accredited entities, the Secretariat, specialized expert panels and ultimately the Board – see it as part of their respective responsibility and contribution; and in particular
- Provide detailed guidelines to accredited entities for the mandatory socioeconomic and gender assessment required by the GCF Gender Action Plan, which is to complement the environmental and social safeguards process .

2.3.6. Readiness and Preparatory Support

The Fund has made readiness and preparatory support for national entities a strategic priority of its early operations as a way to strengthen country ownership and facilitate countries' future access to GCF project/program funding. The GCF Board has appropriated an initial US\$ 30 million for that purpose.⁴² Board decisions B.05/14⁴³ and B.06/06⁴⁴ established an initial work program on readiness and readiness support for the Fund focused on the following: (i) Establishment of national designated authorities or focal points; (ii) Strategic frameworks, including the preparation of country programs; (iii) Selection of intermediaries or implementing entities; (iv) Initial pipelines of program and project proposals.

Decision B.08/11 then further revises and details the work program and its priorities, stipulating specifically that one of the core activities to be supported by the readiness program should be the ability of NDAs or focal points "to engage with regional, national and sub-national government, civil-society and private sector stakeholders with regard to the priorities of the Fund, taking a gender-sensitive approach."⁴⁵ The GCF readiness program is also to help enable regional, national and sub-national institutions to meet GCF accreditation standards in order to become IEs or intermediaries for the Fund.

Considered part of the country-driven approach, the readiness request is initiated by the NDA or focal point, which will typically also specify for which of the activities under the readiness work program they would like to receive GCF funding support. NDAs or focal points can request financial support of up to US\$ 300,000.00 over two years for strengthening their own capacity through human resource development, technical assistance and training, workshops and consultations with external stakeholders.⁴⁶ Financial support may also extend to the provision of some direct opportunities for NDAs and focal points to strengthen their gender competency and their outreach to their country's gender equality mechanisms and women CSOs as well as community groups to solicit gender-relevant input for country programs and to establish best-practice gender-responsive stakeholder engagement and participation procedures. At its meeting in July 2015, the GCF Board in decision B.10/10 reinforced that "NDAs/FPs should facilitate country coordination and engagement with representatives of relevant stakeholders such as the private sector, academia and civil society organizations and women's organizations."⁴⁷ While the GCF Secretariat cannot formally mandate the country requesting readiness support to focus a substantial part of the capacity-building on the NDAs/focal points' gender competency, the Secretariat in its interaction with the recipient country can nevertheless stress that the readiness program provides an important opportunity to also improve the gender capacities of NDAs/focal points.

As of early October 2015, the GCF Secretariat has received readiness requests from 87 countries, with 17 countries already receiving support for building the capacity of NDAs/focal points or for developing strategic frameworks or country programs for the engagement with the Fund⁴⁸, with another 30 plus countries in the pipeline for similar support.⁴⁹ The Secretariat has also organized capacity building and training for accredited entities on the environmental and social safeguard and the gender policy of

the GCF and has provide support for 36 to potential NIEs from 30 countries, including assessment of seven entities for their readiness for accreditation.

Key Recommendations:

- NDAs and focal point should request readiness and preparatory support from the GCF Secretariat to strengthen their own gender competency through human resource development as well as their ability to reach out to their country's gender equality mechanism and to establish best-practice gender-responsive stakeholder engagement and participation procedures; and
- The GCF Secretariat in negotiating and finalizing grant agreements for readiness and preparatory support should encourage requesting countries to include activities that promote the gender-related mandates of the Fund in their country's readiness and preparatory support program.

2.3.7. Independent Accountability Mechanisms

The GCF is in the process of setting up three independent accountability mechanisms all of which will directly report to the Fund's Board. These are the Independent Evaluation Unit (IEU), which is asked to regularly assess Fund results, including the results of its activities and its effectiveness and efficiency; the Independent Integrity Unit (IIU), which is tasked to investigate allegations of fraud and corruption; and the Independent Redress Mechanism (IRM), which will receive complaints from both affected people who might be harmed by Fund activities as well as from recipient countries intent on challenging GCF Board funding decisions.

Board decision B.06/09 established the terms of reference (TOR) for all three mechanisms.⁵⁰ The terms of reference for the IEU include an explicit reference to gender equity as an evaluation criterion to be considered in independent evaluations of the unit of Fund performance.⁵¹ IEU evaluation reports will be published and findings reported to the COP. IEU findings are to feed back into the design phase of GCF projects/programs and contribute to strengthening GCF knowledge management as a "continuously learning institution guided by processes of monitoring and evaluation" as promised in the GCF governing instrument.⁵² An early evaluation focus on the gender-responsiveness of GCF projects/programs and their implementation is thus a key opportunity to improve the gender-related learning process of the Fund and its partners. The accessibility of an independent redress mechanism is also a key accountability tool to safeguard the gender-responsiveness of GCF-funded actions and to guard against continued gender discrimination in their implementation. The TOR for the IRM clarify that a "grievance or complaint can be filed by a group of persons who have been directly affected by adverse impacts through the failure of the project or programme funded by the Fund to implement the Fund's operational policies and procedures, including environmental and social safeguards, or the failure of the Fund or its intermediaries and implementing entities to follow such polices."⁵³ CSOs had been unsuccessful in pushing for the eligibility of a single person to submit such grievances, fearing that the requirement of a group or class to come together to file a complaint might make the Fund's IRM less accessible for the most vulnerable people, including women.

A Board Committee and the Fund Secretariat are in the process of finding and selecting the heads of the three GCF accountability units to be confirmed by the Board ideally later this year, so that the mechanisms can take up their work in conjunction with the start of GCF project/program implementation. The Board in decision B.10/5 adopted the terms of reference of the heads of all three independent

accountability units.⁵⁴ For the IEU head, the required experiences and qualifications include “strong gender skills and experience in order to embed gender within all evaluations of the Fund”⁵⁵; for the IIU and the IRM heads, “strong gender skills, sensitivity to political, and respect for cultural factors” are required qualifications”; lastly, the TOR for the head of the IRM require in addition “experience working with human rights”, and “experience working with vulnerable and indigenous communities and evidence of strong gender skills.”⁵⁶ It will ultimately be up to the new IRM head to determine the reporting and documentation requirements for filing grievances with the GCF’s IRM and thus its accessibility for affected women in recipient countries. In this context, it matters for example if the IRM is willing to accommodate non-written testimony in local languages to take into account the higher illiteracy rates of women in many countries or their lack of access to modern communications technology, including via the internet.

Encouragingly, the required skill set of the individuals sought to head the Fund’s accountability units include gender capacities. It remains to be seen if the gender skills of applicants are considered an important decision criterion in the selection of the heads of the accountability units. If so, this would help to guarantee that the gender-responsiveness of Fund actions and its contribution to gender equality and women’s empowerment is a routine component of any independent review. The responsibility for applying lessons learned and applying consequences resulting from such gender-informed findings would then rest directly with the GCF Board and its 24 members.

Key Recommendations:

- The gender expertise of applicants to head the Fund’s three accountability units, the Independent Evaluation Unit (IEU), the Independent Integrity Unit (IIU) and the Independent Redress Mechanism (IRM), should be considered an important decision criterion in their selection;
- The new IEU should place an early evaluation focus on the gender-responsiveness of GCF projects/programs and their implementation as a key opportunity to improve the gender-related learning process of the Fund and its partners;
- The new IRM should consider the accessibility of the mechanism for affected women in recipient countries centrally, including by accommodating non-written testimony in local languages.

3. Key Entry Points to Further Strengthen Integration of Gender Considerations in the GCF

3.1. Opportunities to Further Strengthen Gender Integration in Project/Program Development and Implementation at the GCF Operational Level

Although the GCF Board might approve its first funding proposals as early as November 2015, the operationalization of the GCF is far from complete. Many of the Board current operational policies are set as interim or initial policies with a built-in review procedure, often within a three-year period after they were approved by the Board, which does allow for improvements and upgrades based on early lessons learned or weaknesses identified. In addition, several of the key operational policies and guidelines needed to provide for monitoring, transparency and accountability, including the Fund’s monitoring and accountability framework (M&A), its update to an interim information disclosure policy or a formal stakeholder engagement policy and mechanism have still to be developed and approved by the Board over the next few Board meetings. For example, the GCF Secretariat has yet to issue formal consultation guidelines and has not yet formalized a stakeholder participation mechanism at the Fund-

level, with only rudimentary voluntary guidance for stakeholder engagement at the national level.

Other important policy decision relating to the engagement of the private sector or to enhancing countries' direct access to GCF funding are forthcoming. Lastly, even in approved policies and frameworks, where some gender integration has already been codified, further improvements in gender-responsiveness are possible, for example with respect to the proposal approval process.

3.1.1. Monitoring and Accountability Framework

The GCF Board and Secretariat in the summer of 2015 began work on the Fund's monitoring and accountability (M&A) framework for accredited entities. The framework is to include the actions and procedures, including incentives and corrective remedies, to ensure that the accredited multilateral, regional and national implementing entities (MIE, RIE, NIE) and intermediaries implement Fund projects/program in compliance with the fiduciary standards, the environmental and social safeguards (ESS) and the gender policy set by the Fund. In Board decision B.10/07 the Board requested that the Secretariat further develop such a framework by building on a progress report provided to the Board at its 10th meeting⁵⁷ and by drawing also on the engagement with a "wide group of stakeholders, including women, through a call for public input."⁵⁸ This call was issued with a three-week deadline for public submission in early August. Stakeholders were asked to provide recommendations on a number of issues relevant for the M&A of accredited entities' performance, including on the role of early warning systems and local monitoring with feedback from a range of stakeholders, including local women.⁵⁹ The GCF governing instrument explicitly encourages the use of participatory monitoring involving stakeholders.⁶⁰ The Board is set to approve an M&A framework at its 11th meeting in November.⁶¹

The M&A framework and the gender dimension of its constituent elements provide a key opportunity to strengthen the gender responsiveness of project/program implementation. Such a framework must include a transparent system of sanctions and corrective actions for non-compliance with the gender policy, with swift and immediate actions especially in cases where human and women's rights violations are suspected or occurring. A track record of low-quality implementation or partial non-compliance with the GCF ESS and gender policy should disqualify the accredited entity from participating in requests for funding proposals (RFPs) and jeopardize its re-accreditation after five years. Annual self-reporting on compliance, including on the Fund's gender policy, in and of itself is insufficient. It must be accompanied by ad-hoc checks by the Secretariat and through independently verified implementation information from third-party external evaluators as well as from affected communities and population groups, including women.

Any GCF early warning system must include the meaningful consultation and participation of local stakeholders through participatory monitoring and evaluation (PM&E). Such an approach goes beyond a limited and ex-post one-time feedback after harm has occurred (for example in addressing grievances via the GCF IRM). It demands the early, active and ongoing engagement of potential beneficiary groups and communities in project implementation, including the setting of project/program-specific indicators for local monitoring through the involvement of local women's groups in the identification and local monitoring of equal and gender-responsive project/program benefits for men and women. PM&E strengthens local capacity for project oversight and data collection, which is a prerequisite for the ability of communities and women's groups to execute future community-based projects directly, for example via small grant facilities under an enhanced direct access approach that the GCF is considering.

Key Recommendations:

- Establish a transparent system of sanctions and corrective actions for GCF accredited entities for non-compliance with the gender policy, with swift and immediate actions in cases where human rights and women's rights violations are suspected or occurring;
- Complement annual self-reporting on compliance by GCF accredited entities, including on its gender policy, with ad-hoc checks by the Secretariat and independently verified information from third-party evaluators and affected communities and population groups, including women; and
- Establish a GCF early warning system for non-compliance of accredited entities through participatory monitoring and evaluation (PM&E) approaches as an ongoing process involving local women's groups in order to strengthen their capacity for project oversight and data collections and as a precursor for their ability to execute future community-based projects directly, for example as part of small grants provision under enhanced direct access modalities.

3.1.2. Information Disclosure Policy

In the fall of 2013, the Board with decision B.05/16 adopted an interim information disclosure policy⁶² valid until a more comprehensive information disclosure policy can be developed and adopted. The Board is expected to decide on a more comprehensive policy at its 11th meeting and opened a four week public consultation period on such an upgrade to the existing policy in late August 2015.⁶³ The interim policy has some shortcomings that have negative implications for women. These include for example the stipulation in para. 26 that the identity of applicant entities for GCF accreditation can only be released after their accreditation was approved by the Board instead of after the application is vetted and recommended by the Accreditation Panel for Board approval as for example is the case in the Adaptation Fund. This deprives local women's groups of the opportunity to testify to the track record of entities applying for GCF accreditation and voice concerns, especially if there is a history of the entity ignoring or violating women's rights and environmental or social safeguards in project proposal development and implementation.

The interim information disclosure policy is also vague regarding the timeliness and early disclosure of comprehensive project-related information and documents to ensure that those documents are accessible already at the design stage and throughout the project cycle in addition to relying on disclosure of this information on the implementing entities' own websites. The current policy also assumes that all disclosed documents on its own website will be in English and does not require GCF implementing entities to disclose all project-related information in local languages. This severely constrains the ability of many women in developing countries to assess and utilize GCF project relevant information. An upgrade to the GCF information disclosure policy must ensure the early publication of all project-related information is early and the inclusion of a requirement to provide project information in local languages via other media than only websites, so that women as potentially affected group can voice concerns already at the project proposal stage.

The participation of developing country stakeholders in GCF Board proceedings, primarily hindered because there is no financial support by the GCF Secretariat for their travel to Board meetings, is further weakened by the Board's practice of not allowing live webcasting of its meetings. Many representatives of Southern CSOs, including women's groups, do not have the financial flexibility to self-fund participation as observers to GCF Board meetings and are thus reliant on following the Board proceedings and outcomes by any means possible, including through CSO information sharing and web participation. An upgraded information disclosure policy should thus include the ability to webcast

GCF Board proceedings live, although of course additional measures are needed to strengthen the ability of women CSOs to influence the process. These could include outreach and engagement fora hosted by the GCF Secretariat in developing countries (f.ex. regular regional CSO feedback conference calls) or the establishment of financially supported CSO regional or national coordinators).

Lastly, with the impending revision to the GCF interim information disclosure up for Board decision at its 11th Board meeting, it becomes even more important, that the policy's presumption of information disclosure is strengthened in a revised policy to be as pro-active as possible, and that the need for formal requests for information (reactive disclosure) as well as disclosure exceptions are kept to a minimum by assuring that the public interest generally overrides other concerns such as proprietary business interests or third party concerns except for very narrowly defined information and circumstances.

Key Recommendations:

- Strengthen pro-active information disclosure of the current interim disclosure policy in an upcoming policy revision so that the need for formal information requests (reactive disclosure) as well as disclosure exceptions are kept to a minimum and the public interest generally overrides other proprietary and third party concerns;
- Ensure that an upgraded information disclosure policy provides for the early and comprehensive release of all relevant project information (including in local languages) to give affected local women the opportunity to voice concerns;
- Allow for live webcasting of all Board proceedings to facilitate the ability of women CSOs in developing countries to follow and engage in the GCF Board process; and
- Delete the current prohibition against the release of the identity of applicant entities for GCF accreditation until after their accreditation was approved by the Board. Instead, the policy should be upgraded to release the applicant entity's identity after the application is vetted and recommended by the Accreditation Panel for Board approval as for example is the case in the Adaptation Fund so that local women's groups can voice concern about an accreditation applicant entity if needed.

3.1.3. Enhanced Direct Access Pilot Approach

An important access modality to GCF funding is direct access (DA), which allows accredited national, regional or sub-national entities to receive GCF funding without having to go through a multilateral organization or agency (for example multilateral development banks or UN agencies). The GCF governing instrument also mandates the consideration of "additional modalities that further enhance direct access."⁶⁴ Under enhanced direct access (EDA), decision-making on individual sub-projects within a larger programmatic approach (which is approved by the GCF Board) is then placed with the NIE or RIE. An example of such an EDA modality with direct relevance for enhanced access of women's groups to GCF funding would be setting up a national small grants facility as a GCF-funded program, with the decision on individual small grants then made by the domestic implementing entity (NIE). Such small-scale grant provision will allow local women and community groups simplified access to smaller sums of GCF funding for concrete activities on the ground, which they can frequently execute themselves.

GCF Board decision 10/04 recently approved the terms of reference (TOR) for an EDA pilot phase, which aims at providing up to US\$200 million for at least 10 pilots, of which at least four have to be implemented in the countries most vulnerable to climate change, small island developing countries

(SIDS), least developed countries (LDCs) and African states.⁶⁵ The EDA pilot projects will be solicited by a request for proposal (RFP) through NDAs/focal points and public media. The EDA pilot phase TOR stipulate that the NDA or focal point will select a national entity (which will either be already accredited with the GCF or seek accreditation) to submit an EDA proposal under the pilot phase. The country pilots can include both adaptation and mitigation activities that will contribute to one or more of the Fund's result areas. The TOR clarify that "a gender-sensitive approach in developing the activities of the pilots is recommended in accordance with the Fund's Gender Action Plan. A significant share of small-scale activities should directly support communities or SMEs through, for example, small-scale grants or extended lines of credit."⁶⁶ Entities are encouraged in the development of their pilot proposals to adopt gender-sensitive and participatory approaches in planning, and monitoring and evaluation so as to assure that the needs of communities are appropriately addressed. As decision-making for EDA sub-projects will be made at the national level, under the EDA pilot phase a minimum requirement for a EDA proposal submitted by an NIE or RIE includes the existence of a decision-making body housed and managed by the entity, which "should include civil society, the private sector and other relevant stakeholders, and should be sensitive to gender considerations."⁶⁷ Oversight over the EDA activities in any given country will be provided by an in-country existing institution identified by the country. Oversight activities will include strategic guidance; review of reporting of the EDA accredited entity as well as periodic field visits and communication with stakeholders and the GCF. The body exercising the oversight function "should include the NDA or focal point and representatives of relevant stakeholders, such as government, the private sector, academia or civil society organizations, and women's organizations."⁶⁸

In the GCF context, the lessons learned from small-scale EDA funding approaches from the GCF pilot phase could lead ideally to the widespread replication of such facilities in GCF recipient countries and could even be encouraged by safeguarding a certain percentage of the GCF funding a developing country might receive, for this purpose. A national oversight functions with representation by local women's groups and women's organizations could guarantee that EDA financial provision is done in a gender-responsive way. With the right national-level governance, such small-scale EDA funding approaches would promote and support bottom-up, community-owned and gender-responsive mitigation and adaptation projects with guaranteed local benefits.

Key Recommendations:

- Make the consideration of project-specific gender aspects a key criterion in the selection of the 10 pilots under the GCF's Enhanced Direct Access Pilot Approach;
- Include gender-responsive small grants facilities under the selected pilot proposals to provide lessons learned for their widespread replication after the EDA Pilot Approach has ended; and
- Provide guidelines to ensure the selection and meaningful participation of representatives from local women's groups and women CSOs in the decision-making body of any GCF accredited entity approved for enhanced direct access and in the oversight function of the national institution tasked to provide transparency and accountability of the in-country EDA activities to ensure gender-responsive implementation of EDA pilot projects.

3.1.4. Private Sector Facility with MSME Pilot Approach

The GCF intends to put a heavy focus on the engagement of the private sector in its projects and programs, demonstrated by the establishment of a Private Sector Facility (PSF) with its own director as one of five organizational divisions in the GCF Secretariat. Already at its 4th Board meeting, the

Board with decision B.04/08 committed to establishing a Private Sector Advisory Group (PSAG), composed of four Board members, eight private sector representatives and two civil society representatives.⁶⁹ Board decision B.05/13 formally established the PSAG as a Board panel and adopted its terms of reference tasking the PSAG to make recommendations to the Board on the Fund-wide engagement with the private sector and related private sector modalities.⁷⁰ The focus of the recommendations of the PSAG to the Board and related policy deliberations has been mainly on how to achieve funding at scale through private sector leveraging as well as how to engage local domestic enterprises, particularly micro-, small-, and medium-sized enterprises (MSMEs).⁷¹ The latter is of particular importance to ensure gender-responsive private sector engagement.

In July 2015, the GCF Board adopted decision B.10/11, which establishes a PSF pilot program of up to US\$200 million to support MSMEs to be allocated by 2018. The Secretariat, incorporating recommendations by the PSAG, is tasked to develop the terms of reference (TOR) for a request for proposal (RFP) for GCF-accredited entities interested in submitting proposal and managing such MSME projects under the pilot program.⁷² It is crucial that the TOR of such a program highlight the need to actively engage and support women entrepreneurs, which form the majority of the micro-, and small-size enterprises in developing countries, to allow them to invest in climate change related activities, often mitigation-relevant products and technologies. For example, in Rwanda, women own 60 percent of small businesses, in Lao 68 percent. These women-led MSMEs are often in the informal sector, frequently home-based and service-oriented and provide key benefits for their communities.⁷³ For climate-relevant investments, these women entrepreneurs need small-scale, patient loans provided at low concessional rates (not at interest rates of 20% or more as is charged in many microfinance institutions serving women in developing countries).

The GCF will focus its engagement of the domestic private sector in developing countries on financial intermediaries, such as domestic commercial banks. In order to ensure that this channeling of GCF funding through domestic financial intermediaries is gender-responsive, the GCF must stipulate that the concessionality of the funding it provides to local banks is passed on to the local bank customers, including women customers. This stipulation should be integrated in GCF operational policy outlining, or updating, the terms and conditions of the Fund's financial instruments. GCF concessional finance to local commercial banks in form of subsidies or risk guarantees should be used to buy down the interest rates those developing country banks charge women entrepreneurs, who often lack the formal ownership of assets used as collateral to secure commercial loans at reasonable rates. Such a recommendation could be included in planned guidelines on the application of case-by-case provisions in the financial terms and conditions of GCF instruments.⁷⁴

Key recommendations:

- Ensure that the terms of reference for a request for proposals for the GCF MSME Pilot Approach are developed in such a way that proposals that actively engage and support women entrepreneurs in the MSME sector are given priority selection;
- Support the development of credit lines for small-scale, patient loans at low concessional interest rates for women MSM entrepreneurs by stipulating that
 - GCF accredited financial intermediary local banks pass on the concessionality of GCF funding received to local bank customers, including women customers; and
 - GCF concessional finance to local commercial banks in form of subsidies or risk guarantees is used to buy down the interest rates those banks charge local women entrepreneurs.

3.1.5. Proposal Approval Process with Project/Program Concept and Funding Templates

Since summer 2015, the GCF Secretariat has begun to solicit concept notes and full funding proposals. While the Secretariat provides some feedback and recommendations on the concept note to be sent back to the submitting entity, the full funding proposals are reviewed by the Secretariat and the iTAP with the goal of recommending assessed proposals to the Board. The first such assessed funding proposals are submitted to the Board at its 11th meeting for possible approval⁷⁵ – sending the politically important message to the COP21 just weeks before the Paris climate summit will decide about the 2020 agreement that the GCF is up and running and has to be considered the main tool of the new agreement's financing mechanism and its means of implementation.

The GCF Secretariat has posted both a concept note template⁷⁶ and a full funding proposal template⁷⁷. While both make reference to gender to varying degrees, the comprehensiveness of the integration of gender considerations requested at the concept stage and for the full funding proposal could be improved to increase the likelihood that an approved project/program proposal is gender-responsive. For example, the template for the concept note stage only makes one reference to "gender-sensitive development impact" as an example for the investment criterion of sustainable development potential (thus as a "take-it-or-leave it"), not as something that should be elaborated in any project/program submitted for funding consideration with the GCF. Also, the necessity of a project/program, even at the concept stage, to be developed in compliance with the Fund's gender policy is not referenced and a request for a brief risk analysis makes only reference to "substantial environmental and social risks" and a related impact assessment without including a mention of the gender dimensions of both. The concept note template should be updated to send the clear message that the gender policy is already applicable for the concept development stage of the proposal approval process and to encourage gender learning of project/program proponents and identify gender gaps early.

A new version of the full funding proposal template in contrast does integrate the gender dimension in the template section addressing the expected performance of the proposed project/program against the investment criteria. In particular, the template references the gender-sensitive development impact, and asks to describe the project/program proponent in the template section on the appraisal summary to "describe how the gender aspect is considered in accordance with the Fund's Gender Policy and Action Plan" in the environmental and social impact assessment. However, there is no reference to a mandatory inclusion of gender aspects in the section on detailed project/program description and how the proposed activities are linked to a gender-sensitive performance measurement at the project/program level. Without clearer and more explicit gender references in the funding proposal template, there is the danger that the integration of gender considerations in the project/program funding proposal is viewed by the applicant entity as a "can" and not a "must". The document should be updated to address this shortcoming.

Toolkits and guidance documents for project proponents and implementers that the Secretariat still plans to develop could help address some of the shortcomings identified above, but cannot be considered a substitute for the mandatory inclusion of gender considerations at both the concept note and full proposal stage within the respective templates. It is there where the inclusion gains regulatory weight and turns from a "can" option to a "must" requirement. Nevertheless, toolkits and guidance documents are important to help illustrate how accredited entities could go forward in considering and integrating gender. Future advancements include a Secretariat guidance document for the monitoring and reporting (M&R) of gender-sensitive project level indicators as well as the development of an appraisal toolkit mandated by decision B.07/03, which established the initial proposal approval process.⁷⁸ Specifically, the latter is to elaborate guidelines for stakeholder involvement throughout the project/program cycle.

Key Recommendations:

- Improve the comprehensiveness of the integration of gender considerations into project proposal concept notes and full funding proposals by updating relevant templates that prospective implementers submit to the Secretariat for initial review to give regulatory weight to their inclusion as a “must”. Specifically:
 - Update the Secretariat’s concept note template to include explicit reference to the necessity that the project/program, even at the concept stage, needs to be developed in compliance with the Fund’s gender policy and specifically elaborate that “risks to gender equality” must be addressed in the impact and risk assessment required at this stage.
 - Strengthen the full funding proposal template by mandating the inclusion of gender aspects in the template section on detailed project/program description and how the proposed activities are linked to a gender-sensitive performance measurement at the project/program level.
- Toolkits and guidance documents for project proponents and implementers can play a supplementing role in guiding project developers through mandatory gender integration at the concept and full funding proposal stages, including a still to be developed appraisal toolkit, which is to elaborate guidelines for stakeholder involvement throughout the project/program cycle.

3.2. Opportunities to Further Strengthen Gender Integration in the Development and Implementation of Project/Program Proposals at the Country Level

As a country-driven multilateral climate fund financing mitigation and adaptation actions in developing countries, the country-level engagement in recipient countries is of crucial importance to improve the integration of gender considerations in the development and implementation of GCF project/programs. The willingness and the ability of NDAs and focal points, the formal institutional links between recipient countries and the Fund, to fulfill their specific tasks and roles in Fund operational processes in a gender-informed way is a prerequisite. Targeted support for NDAs and focal points through the GCF readiness program can increase both and provide an incentive to improve gender awareness and understanding, especially since the NDAs/focal points currently are only subject to voluntary GCF guidance because of a narrow understanding of country ownership. In contrast, GCF accredited entities (AEs) proposing and implementing approved GCF projects and programs are subject to mandatory requirement to comply with ESS and the Fund’s gender policy and action plan. They are the other key actors at the country level for successful integration of gender considerations in GCF-funded activities.

3.2.1. Work with National Designated Authorities (NDAs) and focal points

NDAs and focal points (often from a country’s ministry of finance, ministry of planning and/or economic development or ministry of environment/climate change/energy) have the key-role for in-country coordination to determine a recipient country’s funding priorities for the GCF and to potentially develop a country program for GCF funding (stage 0 of the project approval process).⁷⁹ They are eligible for readiness funding support to enhance their capacities and capabilities in country coordination. However, NDAs/focal points take the lead in requesting readiness support and determine for what it should be used. As one of the key funding priorities identified by the GCF Board under the readiness work program, requested readiness funding should focus on strengthening the NDA/focal points’ ability and

willingness to reach out to relevant stakeholders for country coordination and the development of a GCF country program. Relevant stakeholders include existing in-country gender equality mechanisms (such as dedicated ministries for gender equality, gender units/focal points in government agencies, departments or task forces) as well as women, gender and feminist civil society groups and networks, or women entrepreneurs. The Secretariat should encourage NDAs and focal points to actively include these stakeholders in any in-country coordinating activities in responding to an individual country's readiness support request. Ideally, the NDA would set up a formal country coordinating mechanism (CCM) with multi-stakeholder representation in a decision-making council. GCF readiness funding support can be used to set up such a CCM or for workshops or seminars (including funding to allow for the participation of local women participants) to solicit input and preferences for a country program or for internal NDA human resource development with a focus on building an NDA's gender capacity.

NDA/focal point capacity building for stakeholder engagement and outreach is likewise supported by the GCF readiness program. The NDA is tasked with engagement and outreach, which may include provision of easily accessible information on the GCF and its processes to develop national projects/programs for implementation and interaction with local governments and communities in local languages and a special effort to include marginalized groups in such engagement efforts, including women and Indigenous Peoples. Currently, the comprehensiveness of this outreach to specifically involve women's groups is not mandatory, but only in form of voluntary guidance for "initial best-practice options" from the Secretariat.⁸⁰ However, women's groups in a recipient country should establish direct access and an open communication line with their country's NDA or focal point in order to lobby for their needs and interests to be taken into account in country programs and in specific GCF projects and programs proposed for national implementation. The NDA/focal points signal to the GCF Secretariat that they want a proposed project/program to go ahead with the formal no-objection letter, irrespective of whether it is implemented by an MIE, RIE or NIE. The NDA/focal point through its early and comprehensive engagement with women as a key stakeholder group should feel that it can only endorse a project/program if it sufficiently considers and integrates the gender dimension in design and proposed implementation. Currently, the institutionalization of these steps is left as an option to individual countries for implementation. In country demand for gender equality accountability from gender advocates and women's groups must be coupled with sustained readiness and ongoing capacity building support by the Secretariat to improve the existing regulatory shortcoming. The Secretariat could help for example by compiling and sharing a roster of gender and climate change experts that can help NDAs/focal points with building their gender competencies and capacities in-house and in their external outreach, coordination and communication activities.

Lastly, the NDA/focal point proposes and supports national implementing entities (NIEs) to go forward with the accreditation process to the Fund by endorsing the application of a national entity formally via a no-objection letter. Currently, there is no limit to how many national organizations or agencies an NDA/focal point could recommend as an NIE. NDAs/focal points should encourage and propose that domestic women's organizations apply for GCF accreditation. For example, a country's National Women's Affairs/Gender Equality Ministry or National Council of Women with some experience and track record in climate change related activities could apply to serve as an NIE and its application process could be supported under the GCF readiness program if requested by the NDA/focal point.

Key Recommendations:

- The GCF Secretariat should pro-actively suggest and the NDAs/focal points should request support for strengthening the NDA's/focal point's gender competencies and capacities as part of GCF readiness support programs to promote their capabilities for country coordination and

stakeholder engagement;

- The GCF Secretariat should pro-actively suggest and support and the NDAs/focal points should work toward setting up formal country coordinating mechanisms (CCMs) involving representatives from national gender equality mechanisms as well as local/grassroots women's groups in any decision-making council; and
- NDAs/focal points should encourage and support the application of domestic women's organizations with capacities to implement gender-responsive climate actions locally for accreditation with the GCF, including through NDA readiness support requests for that purpose.

3.2.2. Work with GCF Accredited Implementing Entities and Intermediaries

GCF accredited implementing entities (IEs) and intermediaries as part of the accreditation process have been vetted for their capacity to implement the GCF gender policy and related obligations under the gender action plan. However, in several instances, applicant entities have been approved by the Board subject to conditions to be fulfilled prior to the first disbursement of GCF funding for an approved project/program undertaken by the applicant. For example, among the 13 new accredited entities (AEs) that the GCF Board approved at its 10th meeting in July 2015, four AEs had as a condition to either develop or adopt a gender policy "consistent with the Fund's gender policy to be applied to projects and programmes funded by the Fund."⁸¹ This points to the need for further improvements in the gender-related capacity and understanding of AEs and affects national, regional and international intermediaries and IEs.

Gender-responsive project guidelines or toolkits issued by the Secretariat could be part of the solution, as could be a one-on-one engagement of the Secretariat's senior gender and social development specialist with AEs, where certain weaknesses in their capacity to implement the GCF gender policy have been identified. They should also be encouraged to work with a group of gender experts that the Secretariat could build up, or engage with gender and climate change networks who could support them in an advisory function in project or program proposal development and approved proposal implementation. For example, the GCF Secretariat could establish a "Gender Advisory Panel" (GAP) or "Gender Expert Advisory Group" (GEAP) that could bring together gender experts representing civil society, women's networks, country's gender/women ministries, other climate funds, relevant UN agencies, academia and women entrepreneurs on a regular basis to help in policy setting at Fund level (as for example the Private Sector Advisory Group does) or as a roster of experts registered with and familiar with the GCF that implementers could draw on readily for direct project preparation and implementation support.

While national accreditation applicants for direct access to GCF financing must be supported by the NDA/focal point of their respective country, international women's organization or organizations working closely with and on behalf of women (from civil society, philanthropy or specialized UN agencies) are unrestricted in applying for accreditation under international access. National as well as international organizations with a women/gender equality focus should be encouraged to apply for GCF accreditation, particularly if they have the capacity to act as financial intermediaries. While for intermediaries the GCF accreditation process is more complex (since specialized fiduciary principles for project management, on-granting and/or lending/blending will have to be fulfilled), as an intermediary an accredited women's organization can channel GCF funding to other local women's groups or organizations. This might be a particularly interesting option for private philanthropic organization traditionally supporting women's group or funders focusing on the provision of small green/climate-change oriented grants, which often benefit local women's groups as well, irrespective of whether they are

(sub-)national, regional or international entities. As the GCF Board and Secretariat in the past two accreditation rounds at the 9th and 10th GCF Board meetings have striven for a “balanced package” of approved applicants, the inclusion of organizations representing or working closely with women could be one important consideration for ensuring balance within the growing group of GCF accredited entities.

GCF-accredited IEs and intermediaries also benefit from the early and comprehensive engagement of local women’s groups and national gender experts in the project/program design process and throughout the project/program implementation to strengthen the integration of gender considerations throughout the project/program cycle. While the GCF Board and Secretariat still have to define the specificities of the post-approval project/program process and the M&A framework for AEs, it is clear that participatory monitoring and evaluation (PM&E) involving local beneficiaries and men and women equally must play a critical role.⁸² As explained earlier, such an approach demands the early, active and ongoing engagement in project implementation, including the setting of project/program-specific indicators for local monitoring through the involvement of local women’s groups in the identification and local monitoring of equal and gender-responsive project/program benefits for men and women. This is particularly important as it is the IE or intermediary that decides on and sets project-specific indicators to align with the Fund’s PMF, including ensuring that the indicators selected are responsive to gender considerations. Gender-responsive indicators ideally go beyond mere sex-disaggregation of beneficiaries to also focus on the assessment of qualitative changes of the respective roles of men and women in local climate action. The IEs and intermediaries will need detailed monitoring and reporting guidelines for project/program performance measurement by the Secretariat which clearly detail the mandate for a gender-sensitive approach to setting project-level indicators and baselines.

Lastly, when submitting a project/program proposal for GCF funding, the IE or intermediary is asked to identify the executing entities (EEs), which it will oversee and detail its contractual relationship with EEs. The actual implementation of GCF projects and programs on the ground is done by EEs. Thus, the IE or intermediary needs to have sufficient gender capacity to oversee the application of the GCF gender policy principles by the EEs (who themselves are not vetted for their commitment to gender-responsive implementation). Therefore, the choice of EE clearly matters. IEs and intermediaries should be encouraged to engage women’s organizations or local women’s groups or cooperative wherever possible as EEs for all or specific parts of a project/program under implementation. Community-based adaptation measures might be a natural fit for women’s groups to act as EEs, but mitigation measures focusing on renewable energy access addressing existing energy poverty, local transportation efforts or the provision of green small-scale credits through women-led cooperatives could also be considered for EE service provision by women’s organizations.

As EEs, domestic women’s groups or organizations can gain access to GCF resources that they would otherwise not be able to draw upon for project implementation since the majority of these organizations would not be able to fulfill the accreditation requirements of the GCF to serve as an NIE. As EEs, local women’s organizations or cooperatives have also the opportunity to implement in a more gender-responsive way because of their familiarity with gender-specific grassroots community needs and concerns as well as local cultural contexts, thereby contributing to the sustainability, effectiveness and efficiency of the project/program and GCF funding overall.

Key recommendations:

- To address possible gender capacity gaps of GCF accredited entities, the GCF Secretariat should
 - issue gender-responsive project guidelines and follow-up with one-on-one engagement of the Secretariat's senior gender and social development specialist with AEs;
 - provide assistance in the form of expert advice on gender-responsive project planning and implementation for example through a GCF-Secretariat hosted Gender Expert Advisory Group (GEAP) or a Secretariat-vetted roster of gender and climate change experts;
- Gender equality advocates and women's organizations (national, regional and international) with gender and climate change capacities should be encouraged and supported (f.ex. through national readiness activities) to get accredited with the GCF, including as financial intermediaries;
- GCF-accredited IEs and intermediaries should commit to gender-responsive participatory monitoring efforts as part of their obligations under the GCF Monitoring & Accountability framework, with comprehensive monitoring and reporting guidelines to be set by the GCF Secretariat; and
- GCF-accredited IEs and intermediaries should engage women's organizations or local women's groups or cooperatives as executing entities (EEs) wherever possible for all or specific parts of a project/program under implementation.

4. Outlook and Summary of concrete measures to encourage, facilitate, and expand the access of women's organizations/network and gender-responsive projects for GCF funding

The GCF as a key new multilateral climate financing mechanism has a unique opportunity and real potential to set new international best practice in the design and implementation of gender-responsive climate actions from the outset of its operations and thereby ensure that its funding is used to directly and equally benefit men and women in developing countries, particularly those most in need. The gender-responsiveness of GCF funding is not only mandated by existing human rights obligations of all GCF eligible countries, but also a guarantee for the Fund's effectiveness and a prerequisite for its ability to contribute to the paradigm shift toward low-carbon and climate-resilient development globally and transformational change in individual recipient countries.

As the preceding analysis has pointed out, the GCF Board and Secretariat have jointly taken a number of encouraging first and forward-looking steps to ensure that the "gender-sensitive approach" to GCF funding that the GCF governing instrument mandates can be realized by approving its own gender policy and gender action plan in line with integrating gender aspects in important Fund policies, guidelines and frameworks. However, the integration of gender considerations in GCF operations is not yet complete and the Fund and its partners – national counterparts, accredited entities, and a broader set of stakeholders, but especially women's networks, groups and organizations – can still make significant contributions to ensure the gender-responsiveness of GCF funding implementation, beginning with the first GCF projects expected to be approved at the 11th Board meeting in early November 2015. A comprehensive gender integration effort in the GCF is of course not a set of action points but an ongoing improvement process in a community of learning which will only succeed if it is conducted in the most participatory and democratic way, in particular taking into account the differentiated experiences, capabilities and needs of men and women on the ground in recipient countries.

The following is a summary of some crucial actions points and key recommendations, focusing on what the various partners in a GCF community of learning on gender-responsiveness can and must respectively contribute.

GCF Secretariat and Board:

- Top GCF management should send the message to all GCF Secretariat staff that the promotion of gender equality is a core task of the Fund to achieve its mandate of promoting paradigm change in climate actions; thus recruitment of future GCF staff should focus on selecting applicants combining specific technical expertise with gender competence;
- All GCF Secretariat staff should be held accountable for their commitment to integrating gender in their work, including through their work plans and regular staff performance reviews, and the new GCF senior gender and social specialist must have top management support to work with all Secretariat divisions to implement the GCF Gender Action Plan;
- GCF Secretariat staff commitment to gender equality must be supported through regular gender-specific capacity building efforts in order to enhance staff ability to provide due diligence oversight on gender integration in project proposals and its follow through in implementation;
- The GCF Secretariat must work with NDAs and focal points to increase their level of understanding of and capacity for gender-responsive stakeholder engagement and participatory planning, for example through readiness and preparatory support measures;
- The GCF Secretariat must improve current weak “initial best practice options” for in-country stakeholder engagement by issuing strong gender-responsive stakeholder engagement guidelines as part of an operations manual and an appraisal toolkit for the initial proposal approval process.
- The GCF Secretariat must improve the comprehensiveness of the integration of gender considerations by updating relevant concept note and full funding proposal templates that prospective implementers submit to the Secretariat for initial review to give regulatory weight to their inclusion as a “must”.
- The GCF Board must ensure that gender competency is part of the expertise that panel members of specialized GCF expert panels, such as the Accreditation Committee and the independent Technical Advisory Panel provide in addition to efforts for gender balance and diversity of backgrounds and regions;
- The GCF Board should consider the gender skills of applicants to head the Fund’s three accountability units, the Independent Evaluation Unit (IEU), the Independent Integrity Unit (IIU) and the Independent Redress Mechanism (IRM), an important decision criterion in their selection;
- The GCF Board – and the countries represented in the Board, including through negotiations in regional constituencies – must improve the gender balance of their composition and their own gender competency, including through gender capacity building efforts targeting the Board and its members and advisors;
- The GCF Board must strengthen pro-active information disclosure of the current interim disclosure policy in a upcoming policy revision to insure that public interest generally overrides other proprietary and third party concerns, including by providing for the early and comprehensive release of all relevant project information (including in local languages) to give

affected local women the opportunity to voice concerns and by allowing for live webcasting of all Board proceedings to facilitate the ability of women CSOs in developing countries to follow and engage in the GCF Board process.

National Designated Authorities (NDAs) and Focal Points in recipient countries:

- The GCF Secretariat should pro-actively suggest and the NDAs/focal points should request support for strengthening the NDA's/focal point's gender competencies and capacities as part of GCF readiness support programs to promote their capabilities for country coordination and stakeholder engagement;
- The GCF Secretariat should pro-actively suggest and support and the NDAs/focal points should work toward setting up formal country coordinating mechanisms (CCMs) involving representatives from national gender equality mechanisms as well as local/grassroots women's groups in any decision-making council; and
- NDAs/focal points should encourage and support the application of domestic women's organizations with capacities to implement gender-responsive climate actions locally for accreditation with the GCF, including through NDA readiness support requests for that purpose.

GCF Accredited Entities:

- National and regional entities applying for GCF accreditation should proactively seek to strengthen their knowledge and skills on gender issues in order to fulfill accreditation requirements, including their ability to comply with the GCF gender policy, through request for targeted support measures possible under the GCF readiness and preparatory support program;
- GCF accredited entities must be aware that non-compliance with the gender policy in project preparation and implementation will trigger a set of corrective actions and sanctions, with swift and immediate actions in cases where human and women's rights violations are suspected or occurring;
- GCF accredited entities must include gender indicators (both quantitative and qualitative ones) for each individual project/program to be implemented or elaborate why they consider gender issues not relevant in a specific project/program's performance measurement;
- GCF-accredited IEs and intermediaries should commit to gender-responsive participatory monitoring efforts as part of their obligations under the GCF Monitoring & Accountability framework, with comprehensive monitoring and reporting guidelines to be set by the GCF Secretariat; and
- GCF-accredited IEs and intermediaries should engage women's organizations or local women's groups or cooperatives as executing entities (EEs) wherever possible for all or specific parts of a project/program under implementation.
- GCF-accredited IEs and intermediaries submitting proposals under the EDA Pilot Program should include gender-responsive small grant facilities as part of their proposals and include representatives from local women's groups and women CSOs in their decision-making body tasked with making national funding decisions under the EDA approach.
- GCF-accredited IEs and intermediaries submitting proposals for the GCF MSME Pilot Approach should ensure that proposals actively engage and support women entrepreneurs in the MSME sector in the recipient countries;

- GCF accredited financial intermediary should support the development of credit lines for small-scale, patient loans at low concessional interest rates for women MSM entrepreneurs and should pass on the concessionality of GCF funding received to local bank customers, including women entrepreneurs.

Women's organization and networks

- Gender equality and women's organizations (national, regional and international) with gender and climate change capacities should be encouraged and supported (f.ex. through national readiness activities in the case of national women's groups) to get accredited with the GCF, including as financial intermediaries;
- Gender equality and women's organization's and networks should seek to work with GCF accredited entities by becoming executing entities (EEs) for all or specific parts of a project/program under implementation;
- In recipient countries, women's organizations and networks should actively reach out to and demand the inclusion of their representatives in NDA/focal point country coordination efforts for country program development;
- In recipient countries, representatives from women's organization's and local women's groups should demand their participation in the decision-making body of any GCF accredited entity approved for enhanced direct access and in the oversight function of the national institution tasked to provide transparency and accountability of the in-country EDA activities.

Endnotes:

- 1 See for example Aguilar, L. et al. (2009). Training Manual on Gender and Climate Change. IUCN, UNDP, Global Gender and Climate Alliance (GGCA). Costa Rica. Retrieved from: [http://www.gender-climate.org/Content/Docs/Publications/A11_ggca_Training%20Manual%20on%20Gender%20and%20Climate%20Change .pdf](http://www.gender-climate.org/Content/Docs/Publications/A11_ggca_Training%20Manual%20on%20Gender%20and%20Climate%20Change.pdf); UN Population Fund (UNFPA)/WEDO (2009). Climate change connections. A resource kit on climate, population and gender. New York. Retrieved from: <http://www.unfpa.org/public/site/global/lang/en/pid/4028>; UNDP (2009). Resource Guide on Gender and Climate Change. New York. Retrieved from: http://www.gender-climate.org/Content/Docs/Publications/A36_undp_Genderand%20Climate%20ChangeResourceGuide.UNDP.pdf.
- 2 World Bank (2011). World Development Report 2012. Gender and Development, Washington, DC. Retrieved from: <http://siteresources.worldbank.org/INTWDR2012/Resources/7778105-1299699968583/7786210-1315936222006/Complete-Report.pdf>.
- 3 Schalatek, L., Nakhooda, S. Heinrich Böll Stiftung & Overseas Development Institute. (2014). Climate Finance Fundamentals: Vol. 10. Gender and climate finance. Retrieved from http://us.boell.org/sites/default/files/uploads/2014/12/cff10_2014_-_gender.pdf.
- 4 All 187 parties that are signatories to CEDAW are also without exception parties to the UNFCCC, although not all 196 parties to the UNFCCC have ratified CEDAW (with the United States, Iran, Somalia, Sudan and South Sudan being among the exceptions).
- 5 Green Climate Fund (n.d.). Governing Instrument for the Green Climate Fund, para. 4. Retrieved from: http://gcfund.net/fileadmin/00_customer/documents/Key_documents/GCF_Governing_Instrument_web.pdf.
- 6 GCF(October 18, 2015). Status of Pledges and Contributions made to the Green Climate Fund. Retrieved from: <http://news.gcfund.org/wp-content/uploads/2015/04/Status-of-Pledges-2015.10.18.pdf>.
- 7 GCF Governing Instrument, para.2.
- 8 Schalatek, L. (2014). On Promise, Progress, Perils and Prioritization: Update on Efforts to Operationalize a Fund-wide Gender-Sensitive Approach after the 7th GCF Board Meeting. Heinrich Böll Stiftung North America. Retrieved from <http://us.boell.org/2014/06/06/promise-progress-perils-and-prioritization>.
- 9 GCF Governing Instrument, para. 3.
- 10 References to gender are found in the GCF Governing Instrument in: para. 3 (gender-sensitive approach to GCF funding); para. 11 (gender balance of board members); para.21 (gender balance of Secretariat staff); para. 31 (operational modalities – involvement of women as relevant stakeholders); and para. 71 (stakeholder input and participation of women).
- 11 Up to date GCF Board membership information can be retrieved from: <http://www.gcfund.org/board/board-members.html>.
- 12 GCF Board Document GCF/B.10/08, Fourth Report of the Green Climate Fund to the Conference of Parties of the United Nations Convention on Climate Change, 26 June 2015, pp. 8 and 17. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/M0B201507-10th/08_-_Report_to_the_Conference_of_the_Parties_20150626_fin.pdf.
- 13 Schalatek, L. & Burns, K. (2013). Operationalizing a Gender-Sensitive Approach in the Green Climate Fund. Retrieved from: https://unfccc.int/files/cooperation_and_support/financial_mechanism/standing_committee/application/pdf/final_schalatek_burns_gcf_gender-sensitive-approach.doc.pdf.
- 14 GCF Board Document GCF/B.05/23, Decisions of the Board – Fifth Meeting of the Board, 8 – 10 October 2013, p.14. Retrieved from: http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B05_23_Decisions_5th_Meeting_of_the_Board_20131108.pdf.

- 15 GCF Board Document GCF/B.06/18, Decisions of the Board – Sixth Meeting of the Board, 19-21 February 2014, p.5. Retrieved from: http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B06_Decisions_Sixth_Meeting_final.pdf.
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- 17 Ibid, Annex XIII, pp.84-88.
- 18 Ibid, Annex XIV, pp.89-91.
- 19 UNFCCC decision 18/CP.20. Retrieved from: https://unfccc.int/files/meetings/lima_dec_2014/decisions/application/pdf/auv_cop20_gender.pdf.
- 20 GCF Board Document GCF/B.06/18, Decisions of the Board – Sixth Meeting of the Board, 19-21 February 2014, Annex XIII, para. 6, p. 85f. Retrieved from: http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B06_Decisions_Sixth_Meeting_final.pdf
- 21 GCF Board Decision B.07/09 confirmed that the eight essential requirements for the GCF to receive, manage, program and disburse financial resources have been fulfilled. These included the accreditation framework, the project approval process, the results management framework, the investment framework, the allocation framework as well as the structure of the Fund, including its Private Sector Facility.
- 22 GCF Board document GCF/ B.07/11, Decisions of the Board – Seventh Meeting of the Board, 18-21 May 2014, p.6 and Annex I, pp.14-24. Retrieved from: http://gcfund.net/fileadmin/00_customer/documents/MOB201406-7th/GCF_B07_Decisions_Seventh_Meeting_fin_20140619.pdf.
- 23 GCF Board document GCF/B.08/45, Decisions of the Board – Eighth Meeting of the Board, 14-17 October 2014, pp. 4-7, Annexes I – V, pp. 24-61. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201410-8th/GCF_B.08_45_Compendum_fin_20141206.pdf.
- 24 The GCF adopted the Performance Standards of the International Finance Corporation (IFC), the private sector branch of the World Bank, as its interim ESS for three years during which time the Fund's own ESS are to be developed in a consultative process. The IFC PS guidance notes (more than 250 pages), which are to guide the use and implementation of the GCF interim safeguards, do devote one note (guidance note 50) to gender exclusively, and address gender considerations related to PS 1 (on assessment and management of environmental and social risks), PS2 (on labor and working conditions), PS4 (on community health and safety), PS5 (on land acquisition and involuntary resettlement) and PS7 (on indigenous people). However, gender equality and women's empowerment is not mentioned as a guiding principle in the text of the PS themselves and human rights are only explicitly mentioned in PS7 on Indigenous Peoples, not as an overarching approach. This needs to be improved in developing the GCF's own environmental and social safeguards (ESS) in order to be in line with international best practices.
- 25 At its 10th meeting in July 2015, the GCF Board accredited 13 new implementing entities; four of these entities were accredited with the condition to either develop a gender policy or adopt a gender policy consistent with the GCF gender policy before they can access GCF funding for approved projects. These four included the Deutsche Bank, the African Finance Corporation and the Indian NABARD. GCF Board Document GCF/B.10/17, Decision of the Board – Tenth Meeting of the Board, 6-9 July 2015, Annex XXII, pp. 117-119. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201507-10th/17_-_Decisions_of_the_Board_20150721_fin.pdf.
- 26 GCF Board Document GCF/B.11/03, Consideration of accreditation proposals, October 14, 2015. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201511-11th/03_-_Consideration_of_accreditation_proposals_20151014_fin.pdf.
- 27 Document GCF/B.07/11, Decisions of the 7th GCF Board meeting, p.9 and Annex XIV, pp.61-63.
- 28 Document GCF/B.09/23, Decisions of the 9th GCF Board meeting, p.5 and Annex III, pp.24-30.

- 29 GCF Board Document GCF/B.11/04, Consideration of funding proposals, October 15, 2015. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201511-11th/04_-_Consideration_of_funding_proposals_20151015_fin.pdf. See Addendum 1- 8 for the individual funding proposals, available at: <http://www.gcfund.org/documents/all-board-documents.html>.
- 30 Document GCF/B.05/23, Decisions of the 5th GCF Board meeting, p.2f and Annexes I and II, p.15f.
- 31 Document GCF/B.07/11, Decisions of the 7th GCF Board meeting, pp.6-8 and Annexes IX and X, pp.51-54
- 32 Document GCF/B.08/45, Decisions of the 8th GCF Board meeting, p.9f and Annex VIII, pp.71-80.
- 33 Schalatek, L. & Granat, M. (2015). Report on the Workshop on Gender-Responsive Indicators and Performance Measurement with Relevance for the Green Climate Fund (GCF) and other Climate Funds. Heinrich Böll Stiftung North America and IUCN. Retrieved from: Here is the link to the document:
https://portals.iucn.org/union/sites/union/files/doc/boell-iucn_gcf_indicators_workshop_report_final.pdf.
- 34 GCF Governing Instrument, para. 3.
- 35 The latest list of GCF NDA and focal point designations can be retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/Readiness/2015-10-7_NDA_and_Focal_Point_nominations_for_the_Green_Climate_Fund.pdf.
- 36 Ibid, para. 71.
- 37 Document GCF/B.08/45, Decisions of the 8th GCF Board meeting, p.11f and Annex XIII, p.89f.
- 38 Ibid, Annex XII, p.87f.
- 39 Ibid, Annex XIV, p.91f.
- 40 Document GCF/B.07/11, Decisions of the 7th GCF Board meeting, p.5 and Annex VII, pp.47-49.
- 41 Document GCF/B.09/23, Decisions of the 9th GCF Board meeting, Annex XIV, para. 7(a), p.90.
- 42 Document GCF/B.08/45, Decisions of the 8th GCF Board meeting, para. (o), p.13.
- 43 Document GCF/B.05/23, Decisions of the 5th GCF Board meeting, p.9f.
- 44 Document GCF/B.06/18, Decisions of the 6th GCF Board meeting, p.6f.
- 45 Document GCF/B.08/45, Decisions of the 8th GCF Board meeting, pp.12-14 and Annexes XV-XVIII, pp.93-99.
- 46 Document GCF/B.08/45, Decisions of the 8th GCF Board meeting, para. (k), p.13.
- 47 Document GCF/B.10/17, Decisions of the 10th GCF Board meeting, para. (e), p. 11.
- 48 GCF Board document GCF/B.11/06, Readiness programme implementation (progress report), 10 October 2015. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201511-11th/06_-_Readiness_Programme_Implementation_20151010_fin.pdf.
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- 50 Document GCF/B.06/18, Decisions of the 6th GCF Board meeting, p.5 and Annexes III – V, pp.25-35.

- 51 Ibid, Annex III, para. 17(c), p.27.
- 52 GCF Governing Instrument, para.3.
- 53 Ibid, Annex V, para. 7, p.33f.
- 54 Document GCF/B.10/17, Decisions of the 10th GCF Board meeting, p.4f and Annexes II – VII, pp.23-36.
- 55 Ibid, Annex V, p.30.
- 56 Ibid, Annex VI, p.33 and Annex VII, p.35f.
- 57 GCF Board document GCF/B.10/Inf.11, Initial Monitoring and Accountability Framework for Accredited Entities (Progress Report), 21 June 2015. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201507-10th/Inf.11_-_Initial_Monitoring_and_Accountability_Framework_for_Accredited_Entities_20150621_fin.pdf.
- 58 Ibid, p.8f, in particular para. (f), p.9.
- 59 Information about the call for public input for a GCF M&A framework retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/Accreditation/2015-7-30_Call_for_Public_Input_-_M_A_Framework.pdf.
- 60 GCF Governing Instrument, para. 57.
- 61 GCF Board document GCF/B.11/05, Initial monitoring and accountability framework for accredited entities, 11 October 2015. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201511-11th/05_-_Initial_monitoring_and_accountability_framework_for_accredited_entities_20151010_fin.pdf.
- 62 Document GCF/B.05/23, Decisions of the 5th GCF Board meeting, p.11 and Annex XX, pp.52-56.
- 63 Information about the call for public input for an update to the GCF interim information disclosure policy retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/Calls_for_public_input/CALL_FOR_PUBLIC_INPUT_-_Information_Disclosure_Policy__2015.8.27_.pdf.
- 64 GCF Governing Instrument, para. 47.
- 65 Document, GCF/B.10/17, Decisions of the 10th GCF Board meeting, p. 3f and Annex I, pp.18-22.
- 66 Ibid, Annex I, para.20, p.21.
- 67 Ibid, Annex I, para. 23(e), p.21.
- 68 Ibid, Annex I, para. 9, p. 19.
- 69 GCF Board document GCF/B.04/17, Decisions of the Board – Fourth Meeting of the Board, 26-28 June 2013, p.6. Retrieved from: http://www.gcfund.net/fileadmin/00_customer/documents/pdf/B-04_17_decisions.pdf.
- 70 Document GCF/B.05/23, Decisions of the 5th GCF Board meeting, p. 9 and Annex XIX, p.50f.
- 71 See for example GCF Board document GCF/B.10/16, Recommendations from the Private Sector Advisory Group to the Board of the Green Climate Fund, retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201507-10th/16_-_Recommendations_from_the_PSAG_20150618_fin.pdf.
- 72 Document GCF/B.10/17, Decisions of the 10th GCF Board meeting, p.12f.
- 73 Schalatek, L. & Burns, K. (2013). Operationalizing a Gender-Sensitive Approach in the Green Climate Fund, p.5.

74 At its 10th meeting, the GCF Board discussed, but did not decide on such guidelines. It took note of document GCF/B.10/Inf.10, Brief Guidelines on the Application of the Case-by-Case Provisions in the Financial Terms and Conditions of the Fund's Instruments. Retrieved from: http://www.gcfund.org/fileadmin/00_customer/documents/MOB201507-10th/Inf.10_-_Case_by_Case_Terms_and_Conditions_20150619_fin.pdf.

75 Document GCF/B.11/04, Consideration of funding proposals, October 15, 2015.

76 The concept note template can be retrieved from the GCF website at: http://www.gcfund.org/fileadmin/00_customer/documents/Operations/4.4_GCF_Concept_Note_Template.docx.

77 The full funding proposal template can be retrieved from the GCF website at: http://www.gcfund.org/fileadmin/00_customer/documents/Operations/GCF_Funding_Proposal_Template_Version_1.1_clean_copy.docx.

78 Document GCF/B.07/11, Decisions of the 7th GCF Board meeting, para. (h), p.5.

79 Ibid, Annex VII, p.47.

80 Document GCF/B.08/45, Decisions of the 8th GCF Board meeting, Annex XIV, p.91f.

81 Document GCF/B.10/17, Decisions of the 10th GCF Board meeting, Annex XXII, pp.117-119. See in particular applicants APL010 (National Bank for Agriculture and Development, NABARD, India); APL012 (Caribbean Community Climate Change Centre, CCCCC); APL013 (Africa Finance Corporation, AFC, Nigeria); and APL014 (Deutsche Bank Aktiengesellschaft).

82 See submissions of the Heinrich Böll Stiftung North America and other civil society organizations to a call for public input by the GCF Secretariat on the development of the Fund's Monitoring & Accountability Framework. Publication forthcoming on the GCF website.