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Unit



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A Synthesis of Evaluative Findings on the GCF's Country Ownership Approach (COA)



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Abbreviations

AE	Accredited entity
AfDB	African Development Bank
DAE	Direct access entity
DCP	Division of Country Programming
DMA	Division of Mitigation and Adaptation
GCF	Green Climate Fund
IAE	International accredited entity
IEU	Independent Evaluation Unit
IFC	International Finance Corporation
NDA	National designated authority
PPF	Project preparation facility
PSF	Private Sector Facility
RPSP	Readiness and Preparatory Support Programme
SIDS	Small island developing States



I. Country Ownership in the GCF – A Normative Framework

1. **Country ownership is a core principle of the GCF.** The Fund's Governing Instrument highlights the importance of country ownership in shaping its operations and governance. The instrument states, "The Fund will pursue a country-driven approach and promote and strengthen engagement at the country level through effective involvement of relevant institutions and stakeholders." Thus, in the GCF, the concept of country ownership draws its legitimacy directly from the governing instrument itself. This commitment requires the GCF to embed country ownership and a country-driven approach in all its activities.

2. The concept of country ownership at the corporate level has evolved. This synthesis examines how country ownership has been reflected in GCF documentation throughout the years, including Board approved decisions, policies, strategies, frameworks and related documents. Notably, this evolution has occurred in phases, often coinciding with the introduction of new policies and frameworks.

3. **National Designated Authorities (NDAs) are expected to exercise a critical role in ensuring country ownership.** The document titled "Business Model Framework: Country Ownership" (Document GCF/B.04/04) acknowledges that, internationally, there are no specific country-level modalities for ensuring country ownership. At the same time, it synthesizes international-level deliberations on country ownership and outlines the different options, modalities and processes for mainstreaming country ownership in the GCF. The international consensus on country ownership calls for:

- (a) Centralized leadership and coordination based on national plans or strategies
- (b) Country-level decision-making with multi-stakeholder engagement

4. These two approaches place primary responsibility for operationalizing country ownership on the NDAs engaging with the GCF. The business model framework document also explores various options for NDA involvement at different stages of the programming cycle, including:

- (a) Programme oversight, country programming, country-level coordination and coherence with national climate change and development pathways
- (b) Designation of implementing entities (IEs)
- (c) Approval of funding requests and no-objection procedures

5. This synthesis outlines the following as key elements of country ownership at the national level.

- (d) Robust national-level coordination and oversight, especially through NDAs
- (e) The ability of NDAs to clear funding proposals to the GCF by exercising the no-objection procedure
- (f) Participation of a wide range of stakeholders at the national and subnational levels
- (g) The ability to choose from a constellation of entities to programme with the GCF, with a preference for direct access

6. **The no-objection procedure became the key mechanism through which the principle of country ownership was materially operationalized when the GCF started its operations.** The GCF Board approved the initial no-objection procedure through decision B.08/10 titled "Country ownership: Best-practice options for country coordination and multi-stakeholder engagement," in annex XII. The procedure's stated purpose was to ensure consistency with national climate strategies and plans and country-driven approaches and to enable the GCF to implement effective direct and indirect public and private-sector financing. A no-objection was set as a condition for approval of all funding proposals submitted to the Fund.



The procedure also foresaw the role of the NDA in communicating the accreditation application for subnational, national and regional implementing entities and intermediaries. Thus, the no-objection procedure was intended as the primary way for countries and their NDAs to exercise ownership and authority by endorsing or withholding support for proposals submitted to the GCF.

7. **The GCF Secretariat also presented a series of guidelines suggesting how country ownership could be operationalized.** The Board's approval of the original no-objection procedure was accompanied by the approval of a series of initial best practice guidelines:

- (a) **Selection and establishment of NDAs and focal points.** The guidelines in decision B.08/10, paragraph (c), provide advice on the NDA's location, mandate, and potential role in coordinating country engagement with the GCF, as well as the potential qualifications and capacities required to fulfil such role.
- (b) **Country coordination and multi-stakeholder engagement.** Decision B.08/10, paragraph (c), also outlines that national climate change strategies, plans and priorities will provide the strategic framework for the preparation and implementation of funding proposals. The guidelines suggest that to ensure systematization of country coordination and multi-stakeholder engagement, countries could be encouraged to design a consultative process through which national climate change priorities and strategies can be defined. These climate change priorities then become pivotal in determining country ownership of future GCF investments. The guidelines also present different options for structuring country coordination through consultative processes and underline the importance of such mechanisms in supporting the design, ongoing monitoring and evaluation of the Fund's projects and programmes.
- (c) **Country programmes.** With reference to GCF decision B.08/11, paragraphs (i) and (ii), as well as Annex XVII, while these guidelines do not explicitly link country programmes to the principle of country ownership, they do emphasize their usefulness in engaging multiple stakeholders, including governments, subnational institutions, civil society, and the private sector. Country programmes were also seen as the conduit through which countries could articulate their national contexts, climate vulnerabilities and relevant strategies and policies, GCF programming priorities, and financing needs. Thus, in the GCF's initial thinking, country programmes were linked to countries outlining their priorities and the involvement of stakeholders in their preparation. However, in reality, the guidelines offered limited substantive content on the structure and expectations for country programmes.

8. While the positioning of NDAs, multi-stakeholder consultations and the role of country programmes in engaging country ownership were only guidelines, the no-objection procedure was the most concrete responsibility delegated at the country level for exercising country ownership.

9. **The GCF's initial investment framework reflected many of the dimensions of country ownership implicitly and explicitly outlined by the Board preceding the framework.** The GCF's investment framework seeks to translate its overall objectives into clear guidelines for investment decisions. The framework is composed of policies, strategies, targets, and criteria to inform the design, assessment, and approval of GCF funding decisions.¹ In the Initial Investment Framework highlighted in GCF decision B.09/05, country ownership was defined as "Beneficiary country ownership of, and capacity to implement, a funded project or programme (policies, climate strategies and institutions)". This definition is accompanied by an explanation of its coverage area, including activity-specific subcriteria and indicative assessment factors, as outlined in Table 1

¹ Green Climate Fund, "Investment Framework."



Table 1: GCF Initial Investment Framework

	DEFINITION COVERAGE AREA ACTIVITY SPECIFIC SUBCRITERIA INDICATIVE ASSESSMENT FACTORS, INCLUDING INDICATORS			
Country ownership	Beneficiary country ownership of, and capacity to implement, a funded project or programme (policies, climate strategies and institutions)	Existence of a national climate strategy	Objectives are in line with priorities in the country's national climate strategy	Programme or project contributes to the country's priorities for low-emission and climate-resilient development as identified in national climate strategies or plans, such as nationally appropriate mitigation actions (NAMAs), national adaptation plans (NAPs) or equivalent, and demonstrates alignment with technology needs assessments (TNAs), as appropriate
		Coherence with existing policies	Proposed activity is designed in cognizance of other country policies	Degree to which the activity is supported by a country's enabling policy and institutional framework or includes policy or institutional changes
		Capacity of accredited entities or executing entities to deliver	Experience and track record of the Accredited Entity or executing entities in key elements of the proposed activity	Proponent demonstrates a consistent track record and relevant experience and expertise in similar or relevant circumstances as described in the proposed project or programme (e.g. sector, type of intervention, technology, etc.)
		Engagement with civil society organizations (CSOs) and other relevant stakeholders	Stakeholder consultations and engagement	Proposal has been developed in consultation with civil society groups and other relevant stakeholders, with particular attention paid to gender equality. It provides a specific mechanism for their future engagement in accordance with the Fund's environmental and social safeguards and stakeholder consultation guidelines. The proposal places decision-making responsibilities with in-country institutions and uses domestic systems to ensure accountability



Table 2: GCF Revised Investment Framework

CRITERION	DEFINITION	COVERAGE AREA
Country ownership	Beneficiary country ownership of and capacity to implement a funded project or programme (policies, climate strategies and institutions)	<ul style="list-style-type: none"> Existence of a national climate strategy Coherence with existing policies Capacity of implementing entities, intermediaries or executing entities to deliver Engagement with CSOs and other relevant stakeholders

10. Based on its analysis of the Business Model Framework: Country Ownership, the No-objection Procedure and the Initial Investment Framework, the Independent Evaluation Unit (IEU) finds that, in the early stages of Board deliberations, country ownership came to be understood according to the following dimensions:

- (a) Robust national-level coordination and oversight, especially through NDAs
- (b) The ability of NDAs to clear funding proposals to the GCF by exercising a no-objection procedure
- (c) Inclusive participation of a wide range of stakeholders at national and subnational levels, including CSOs
- (d) Proposals making in-country institutions responsible for decision-making and using domestic systems to ensure accountability
- (e) The ability to choose from a constellation of entities to programme with the GCF, preferably those with direct access
- (f) Alignment of GCF investments with national climate strategies, where available, and other relevant national policies
- (g) The capacity of accredited or executing entities to deliver climate finance and climate programming in specific country contexts
- (h) The link between GCF investments and country programmes

11. **Prima facie, country ownership appears to be closely interlinked with the relevance of GCF investments to recipient country needs.** The dimensions outlined above suggest a prominent overlap between the principle of country ownership and the criterion of relevance to the country context. In particular, the dimensions “ability of GCF investments to align with national climate strategies” and “link between GCF investments and country programmes” clearly illustrate how country ownership can serve as a proxy for determining the relevance of an intervention. The GCF’s initial strategic plan highlighted in GCF decision B.12/20 and document GCF/B.12/06 also makes this link, stating that “Prioritizing the development of a pipeline of country-driven, high-impact projects and programmes has the potential to (...) enhance responsiveness to countries’ needs and country ownership.”

12. **Country programmes form an important part of the guidelines on country ownership but were not mainstreamed into the GCF’s programming. This is most clearly reflected in their absence in the GCF’s investment framework(s).** Notably, while country programmes were highlighted as crucial to defining country priorities and engaging



stakeholders at the national level, they were not incorporated into the initial investment framework criteria used to guide funding decisions.

13. In 2017, the Board through Annex XX of decision B.17/21, approved the “Guidelines for enhanced country ownership and country drivenness”. These guidelines emphasize the importance of country programmes in achieving country ownership.
14. The guidelines suggest that country programmes can support country ownership by:
 - (a) Linking individual funding proposals to national sustainable development plans, intended and nationally determined contributions (INDCs/NDCs), and other existing national strategies and plans, such as NAMAs, NAPAs, NAPs, and other adaptation planning processes, as appropriate
 - (b) Supporting long-term planning through the identification of financing needs, potential for climate change investment, and relevant implementing entities
 - (c) Serving as a framework for capacity-building at the country level by consolidating interactions related to readiness support, the project preparation facility (PPF) and funding proposals
 - (d) Promoting direct access and fostering collaboration between international entities and local institutions, as appropriate
15. However, the initial investment framework and the GCF’s revised investment framework do not mainstream country programmes in operationalizing GCF programming.
16. In addition, the initial country ownership guidelines introduced the use of structured dialogues – recently renamed regional dialogues – as opportunities for the Secretariat, NDAs or focal points, relevant accredited entities (AEs) and other stakeholders, including the private sector and civil society, to collaborate in developing country programmes. These dialogues also aim to identify which priorities, outlined in national strategies such as INDCs, LEDS, NAPAs, and NAMAs, best align with GCF support.
17. The initial country ownership guidelines outline the intent to mainstream country ownership into the GCF’s numerous modalities. The country ownership guidelines also include ways to mainstream country ownership into GCF modalities. The ownership principle will be considered across all GCF operational modalities and related policies, including the Readiness and Preparatory Support Programme, the PPF, and the proposal approval process, including the simplified approval and accreditation processes, recognizing that country ownership is a continual process.
18. GCF’s Readiness and Preparatory Support Programme is expected to promote country ownership by supporting key institutional functions at the national level. This includes the preparation of country programmes; building in-country institutional capacities, including for country coordination and multi-stakeholder consultation mechanisms; developing the capacities of potential regional, national and subnational implementing entities and intermediaries; and building the capacity of NDAs or focal points to coordinate and oversee GCF activities in their respective countries.
19. At the accreditation stage, NDAs or focal points are encouraged to nominate direct access entities (DAEs) or partner with international entities to cover their country’s needs and priorities. NDAs are also advised to use readiness support to identify and prioritize national priorities in coordination with AEs and consultation with other stakeholders.
20. In the preparation of funding proposals, the guidelines envisage an interchangeable role for AEs and NDAs as proposal originators. In all cases, the guidelines urge close collaboration between the AEs and NDAs, along with relevant stakeholders, in developing proposals.



21. The guidelines foresee a consultative process as an ongoing process throughout the design, implementation, monitoring, evaluation and exit stages of a project or programme rather than as a one-off activity. This continuous approach encourages updates and regular programme assessment. The consultative processes should engage all relevant actors across government, the private sector, academia, civil society and other relevant groups or sectors.

II. Country ownership in evaluations

22. The previous section outlined how country ownership is reflected across key different documents, offering indications of how the concept has been defined and applied within the GCF. It also included an initial analysis of how the normative framework anchors the GCF's country ownership. However, this synthesis also contains reflections and analysis pertinent to country ownership from numerous independent evaluations, studies and country case studies undertaken by the GCF since the beginning.

III. Institutional capacity and role of NDAs

23. **NDAs play a central role in advancing country ownership, with their engagement serving as the foundational step in ensuring that ownership is realised in practice.** In the GCF's policies and guidelines, the importance of NDAs in ensuring country ownership is evident in the range of authorities and responsibilities vested in them, as outlined earlier. In the past, they have demonstrated leadership in carrying forward country priorities and mainstreaming these into their engagement with the GCF.² However, in the initial stages of the GCF's operationalization, there were numerous challenges in ensuring NDA ownership. This ownership is presumably the first step to country ownership. There have been instances where different ministries within a country have claimed the role of NDA or sought greater involvement in GCF programming.³ Similarly, the lack of robust coordination between national institutions and a weak inter-institutional mechanism for developing GCF proposals, especially with the Ministry of Environment, has hindered country ownership.⁴

24. **NDA capacity is crucial to ensuring both NDA and government ownership, as currently defined by the GCF.** Limited capacity – especially when the NDA is housed in a newly created ministry or ministry with little influence – can present major challenges.⁵ Evaluations have noted that when NDAs are located in Ministries of Environment, coordination with other ministries can be challenging, particularly in contexts where government departments work in silos.⁶ By contrast, NDAs placed in more influential ministries capable of implementing whole-of-government approaches can generally apply more cross-government coordination.⁷ Often, government ministries responsible for the environment or climate change have limited ability

² Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Readiness and Preparatory Support Programme"; Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report."

³ Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Readiness and Preparatory Support Programme."

⁴ Ibid.

⁵ Ibid.

⁶ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the GCF's Investments in the African States."

⁷ Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the African States: Case Study Reports."



to exert influence compared to ministries of finance, which are often better positioned and resourced to support inter-agency cooperation.⁸

25. NDAs often face challenges such as turnover of NDA staff, leading to institutional memory loss. NDAs also report instances of being bypassed by the GCF, which may communicate directly with AEs regarding projects, leaving them out of the loop (this is a dimension covered later in the report) when discussing the trade-offs in the GCF business model when working through AEs.⁹ There are NDAs also face general challenges, such as insufficient human resources and multiple responsibilities, which are particularly acute in SIDS.¹⁰

26. **NDA capacity also affects their ability to coordinate with stakeholders at the national level.** NDAs are often crucial in engaging with numerous stakeholders at the national level and have done so with varying degrees of success. In many countries, they play a vital role in coordinating stakeholders and soliciting projects through AEs.¹¹ This is particularly important for exercising country ownership, considering the GCF-AE business model presents unique challenges to country ownership – an issue examined later in the synthesis.

27. Institutional capacity at the subnational level also plays a key role in country ownership. Even with a proactive NDA, weak capacities at different levels of government can undermine stakeholder participation and negatively affect country ownership.¹² For example, in Kenya, complications have arisen from ongoing government devolution and decentralization, including limited capacity to implement climate change policies.¹³

28. Overall, NDAs and public entities play an important role in ensuring country ownership. Their willingness and ability to undertake important steps that ensure country ownership also point to the importance of NDA and government ownership in the process of ensuring country ownership.

IV. Language and country ownership

29. **Language remains a critical factor in operationalizing country ownership.** Accessing and using GCF documentation is particularly difficult for countries where English is not widely spoken. These challenges include translating the relevant information to stakeholders in the country's *lingua franca*, coordinating and consulting with different stakeholders, and facilitating their responses to the GCF. This hinders country ownership, as

⁸ Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme."

⁹ Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund."

¹⁰ Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

¹¹ Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

¹² Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Readiness and Preparatory Support Programme"; Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund."

¹³ Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Readiness and Preparatory Support Programme."



government staff, experts, entrepreneurs, and CSOs especially¹⁴ often lack the high level of English proficiency needed to engage effectively with the GCF.

30. Reported heavy and complex procedures such as conducting detailed studies, translating voluminous documents and complying with the GCF bureaucracy, as well as long delays, are seen as major roadblocks to benefiting from GCF support.¹⁵

V. National climate policies and frameworks

31. NDCs are often too broad to provide a reference point for promoting meaningful alignment with national priorities. Meanwhile, their alignment with a more granular policy suite remains key in ensuring country ownership. The dovetailing of GCF investments to national climate policies, strategies, action plans and other frameworks is an important element of country ownership. NDCs are usually broad statements that signal a country's intent to engage in climate change action. However, they are often operationalized through a suite of policies and frameworks at a level below the NDCs. These instruments tend to be more focused on country ownership than compliance with NDCs. In Kenya, such policies and frameworks could take the form of a National Climate Fund,¹⁶ while in Mongolia, they could involve alignment with the Green Development Policy 2014 and National Energy Strategy.¹⁷ Overall, country ownership and country needs are vital in driving the implementation of a country's climate change agenda,¹⁸ specifically regarding the policy agenda, including sectoral strategies, policies, and frameworks identified as medium-term priorities.¹⁹ In many countries, these medium-term strategic plans and policies are also viewed as effective substitutes for country programmes.²⁰ Examples include Tanzania's National Environmental Master Plan for Strategic Interventions 2022-2032 and the Roof to Reef Programme in Barbados. Even in countries that have country programmes, these can become outdated quickly if they fail to reflect the country's key medium-term priorities.²¹

32. **While NDCs are broad in scope, certain sectors and policies receive higher priority.** These priorities may occupy policy space temporarily, reflecting shifts in the policy environment, or more permanently, based on the priorities determined by a country's economic structure. This is illustrated in Box 1, which highlights how Namibia has prioritized the livestock

¹⁴ Ibid.; Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the Least Developed Countries: Country Case Studies"; Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme: Country Case Studies."

¹⁵ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the African States: Case Study Reports."

¹⁶ Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Readiness and Preparatory Support Programme."

¹⁷ Ibid.

¹⁸ Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report"; Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports."

¹⁹ Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme: Country Case Studies"; Independent Evaluation Unit, "Second Performance Review of the Green Climate Fund: Morocco Country Case Study"; Independent Evaluation Unit, "Second Performance Review of the Green Climate Fund: Bangladesh Country Case Study Report."

²⁰ Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme: Country Case Studies."

²¹ Independent Evaluation Unit, "Second Performance Review of the Green Climate Fund: Bangladesh Country Case Study Report."



industry – a crucial sector for the government – even though it is one of many targeted in the country's NDCs.

Box 1: Example from Namibia

The Environment Investment Fund in Namibia formulated a livestock-related agriculture project, recognizing that most farmers rely on livestock and that the sector is an essential aspect of rural livelihoods. However, the GCF had problems approving the project due to the livestock sector's potential for methane emissions. In addition, the GCF policy struggled to reconcile the project's inclusion of bush clearing, which the Fund classifies as deforestation. This contrasts with Namibia's perspective, where clearing is encouraged to prevent encroaching vegetation from competing with fodder growth and harming livestock-based livelihoods. Such divergence in perspectives has the potential to adversely affect country ownership.

Source: Forward-Looking Performance Review of the Green Climate Fund: Countries Report – Namibia

33. In some countries, certain policy frameworks are well developed and closely tied to the political context, reflecting a high level of political commitment. This is evident in Uganda's approach to wetlands. The government's emphasis on wetland protection started in 1986 when the administration came into power. Uganda was among the first countries to adopt a national wetlands policy in the 1990s, marking a shift from an exclusionary approach to forest resources towards a more community-based model.²²

34. In some cases, such national priorities are further integrated into programmatic approaches designed at the national level, with projects and programmes expected to align with country-led and owned frameworks. This can be seen in cases such as the Roof to Reef programme in Barbados,²³ which is discussed in the section on country programmes. Nevertheless, countries do not always express their national priorities explicitly.²⁴ Instead, they tend to recalibrate their preferred programming expectations with the GCF based on evolving medium-term priorities.²⁵

35. Overall, investments that embed themselves firmly into the most important policy priorities of countries also tend to have a high level of ownership at the national level. In some cases, policy priorities are well established and long term in nature, while in others, they emerge as policy thinking evolves at the national level.

VI. National Systems and Direct Access

36. **In some countries, the GCF has supported national-level systems that promote country ownership, while in others, such systems have been developed by the countries themselves.** Countries often prefer to use national systems when programming, as this allows them to align financing with national priorities. The 2005 Paris Declaration reinforces this commitment to national systems, with the key features of climate finance, such as the no-objection procedure, multi-stakeholder consultations, and direct access, reflecting its principle of country ownership.

37. **The no-objection procedure, as a process proxy, is not sufficient on its own to ensure true country ownership.** The GCF has operationalized the usage of national systems

²² Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports."

²³ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

²⁴ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the Least Developed Countries: Country Case Studies."

²⁵ Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme: Country Case Studies."



through the no-objection procedure. Each country is free to use its existing systems or establish new ones to implement the no-objection procedure for project proposals, as recognized in the Initial Guidelines on No-objection Procedures, highlighted in GCF Board decision B.08/10, annex XII. In some countries, NDAs have set up sophisticated measures for issuing no-objections and reviewing project proposals, often involving intragovernmental coordination and the engagement of multiple stakeholders.²⁶ There are instances of concept notes originating from nationally developed consultation and deliberation systems.²⁷ However, the no-objection procedure on its own is not a sufficient indicator or guarantee of genuine country ownership.²⁸ AEs, especially international accredited entities (IAEs), have at times sought no-objection signatures without allowing the NDA enough time to conduct a comprehensive assessment – in practice, hindering the national system set up for consultations on project proposals.²⁹ Other aspects encumber the effective deployment of the no-objection procedure, as noted in more detail below when discussing the trade-offs in using AEs to provide access to countries.

38. **The use of national systems is a key element of country ownership, yet the GCF's fiduciary requirements often impede them.** The GCF's stringent accreditation requirements, while appreciated, often result in policies and fiduciary requirements already present in national systems. These existing national systems are often used by organizations such as the International Finance Corporation (IFC) and the African Development Bank (AfDB) but are deemed inadequate by the GCF. On the one hand, this can create a dissonance between the GCF's accreditation requirements and project approval processes, and on the other, the principle of country ownership through the use of national systems.³⁰ In addition, the GCF does not recognize the competencies, due diligence procedures, or policies of other multilateral or AEs. It insists its procedures are followed, even when this leads to duplication or inefficiencies.³¹ This lack of recognition also extends to national government procedures.³² As a result, some AEs bypass national systems in implementing GCF projects,³³ undermining the principle that the use of national systems is a key fulcrum of country ownership.

²⁶ Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Readiness and Preparatory Support Programme"; Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report"; Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the African States: Case Study Reports"; Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Approach to the Private Sector: Country Case Study Reports."

²⁷ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

²⁸ Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the African States: Case Study Reports"; Independent Evaluation Unit, "Independent Evaluation of Relevance and Effectiveness of the Green Climate Fund's Investments in the Least Developed Countries"; Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Approach to the Private Sector: Country Case Study Reports."

²⁹ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

³⁰ Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report."

³¹ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

³² Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme: Country Case Studies."

³³ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the Least Developed Countries: Country Case Studies."

39. **Direct access remains a key demand for countries, regardless of existing partnerships with IAEs.** Across countries, accreditation and programming through direct access are overwhelmingly preferred to programming through IAEs.³⁴ Even where national governments have a strong and trusted relationship with IAEs, the desire for direct access remains strong.³⁵ Projects implemented by DAEs are generally seen as more country driven.³⁶ The desire to implement programming through national entities also extends to the Readiness and Preparatory Support Programme (RPSP), where much of the programming is still undertaken through IAEs and international delivery partners.³⁷

40. **Countries see various advantages in direct access as a modality, but there is little clarity on how it will be used to programme and materialize country ownership.** The direct access modality is considered innovative compared to other funds, with the exception of the Adaptation Fund. It allows funds to go directly to the countries and, depending on the project design, can reach targeted communities and eliminate transaction costs. It also enhances national agency in adaptation planning and implementation and helps build in-country capacity for sustained adaptation.³⁸ Many countries consider IAEs as a temporary measure to get interim access to the GCF while strengthening their capacity to pursue direct access.³⁹ While IAE partners are helpful and capable, countries find DAEs as a means to accomplish much more. Direct access also reduces costs by avoiding overreliance on outside experts.⁴⁰ However, the evidence on whether direct access by itself can ensure country ownership remains inconclusive.⁴¹

41. That being said, there are currently no criteria for how many DAEs are appropriate or needed per country to advance country ownership effectively and efficiently. Accreditation has proven to be a complicated and lengthy process, and developing proposals for both RPSPs and FPs has been resource intensive. In particular, it has been difficult to find strong DAE candidates, especially in the least developed countries and small island developing states (SIDS), where resources are scarce. While accrediting one or more DAE contributes to the foundation of country ownership, simply increasing the number of DAEs does not guarantee that more project proposals will be developed or submitted.⁴²

VII. Predictability, access and country ownership

42. **Timeliness and predictability of access remain a cornerstone of country ownership.** Often, funding proposals are reviewed extensively at the country level. This may happen without pre-emptive engagement with the GCF. A no-objection letter and agreement obtained from the NDA in such cases may indicate consensus-based support and alignment with

³⁴ Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Readiness and Preparatory Support Programme"; Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report."

³⁵ Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report."

³⁶ Ibid.

³⁷ Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme."

³⁸ Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports."

³⁹ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in Small Island Developing States."

⁴⁰ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

⁴¹ Independent Evaluation Unit, "Independent Synthesis of Direct Access in the Green Climate Fund."

⁴² Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the GCF's Investments in the African States"; Independent Evaluation Unit, "Independent Synthesis of Direct Access in the Green Climate Fund."

national priorities.⁴³ However, even in such cases, there is often no assurance the GCF will approve the projects or do so in a timely manner. The long process for obtaining accreditation and funding negatively affects country ownership and frustrates stakeholders.⁴⁴ This also makes the GCF a less competitive source of financing for countries⁴⁵ and discourages engaging potential national-level partners.⁴⁶ Overall, a strong understanding of GCF processes and requirements is required to develop a robust pipeline and gain access.⁴⁷

43. **Predictability and timeliness of access – key elements of country ownership – also affect a country’s ability to define and pursue its priorities.** As the First Performance Review noted, while country ownership is a core GCF principle and direct access one of its key pillars, most countries initially prioritize securing funding over establishing institutional arrangements or engaging in an access modality. This confirms that predictability and timely access are important attributes of country ownership. The fact that the GCF is perceived as a “difficult donor” by function makes it more difficult to programme through DAEs and increases the demand for programming through IAEs.⁴⁸ Thus, one dimension of country ownership – predictability and timeliness – affects another dimension of country ownership: **direct access**.

44. In cases such as SIDS, even IAEs are reluctant to design projects due to factors such as remoteness and cost of operations.⁴⁹ The complexity of GCF proposal requirements also forces externally driven, top-down project designs onto some countries to ensure “the designs were what GCF wanted.” As a result, countries may become dependent on IAEs, external consultants, and expatriates rather than government officials leading project development and oversight.⁵⁰ This makes the process costly⁵¹ and sidelines existing **national capacities and systems**.

⁴³ Independent Evaluation Unit, “Independent Evaluation of the Green Climate Fund’s Readiness and Preparatory Support Programme.”

⁴⁴ Ibid.; Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of the GCF’s Readiness and Preparatory Support Programme: Country Case Studies”; Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund: Vietnam Country Case Study Report.”

⁴⁵ Independent Evaluation Unit, “Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports”; Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund: Vietnam Country Case Study Report.”

⁴⁶ Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund: Bangladesh Country Case Study Report.”

⁴⁷ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in Small Island Developing States.”

⁴⁸ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund.”

⁴⁹ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in Small Island Developing States.”

⁵⁰ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in the African States: Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in the Least Developed Countries: Country Case Studies.”

⁵¹ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in the African States: Case Study Reports.”



45. NDAs and focal points have many other responsibilities within their governments, and their work with the GCF is usually an additional task.⁵² The lack of predictability often leads to uncertainty for countries when planning various options to meet their climate priorities.⁵³ Countries with little engagement with the GCF tend to have low country ownership as well.⁵⁴ This leads to NDAs being unable to align GCF investments with national climate strategies and policies or embed them into ongoing national programmes, which is another crucial aspect of country ownership, as recognized in the GCF's investment framework.

46. **Measures to improve predictability and access have not been successful.** Past SAP projects have not succeeded in substantially reducing the burden of project preparation or in improving the efficiency of the GCF project cycle for “small” GCF operations. Neither has the SAP succeeded in enhancing predictability for partners. AEs, including those with experience processing GCF projects, did not know how to deal with the GCF processes, requirements and concepts. RPSP also has not been able to bridge the gap between the capacities strengthened through accreditation and the capacities needed to prepare and implement a GCF-funded project.⁵⁵

47. Taken together, these issues represent a broader concern in the GCF's engagement with countries and carry important implications for realizing country ownership. The onus for laying a foundation for country ownership rests entirely on the countries, but the GCF is unable to provide the predictability needed to ensure country ownership. This holds in equal measure for RPSP grants, which are expected to finance building blocks for country ownership in the first place, and GCF funding proposals, which are expected to be “owned” by countries in the first place. Thus, it appears that other than a rather unpredictable flow of RPSP resources from its end, the GCF does not assume much else of the responsibility to reciprocate the efforts to promote country ownership at the national level. The GCF expects country ownership but does not provide predictability of approval of projects/financing, which are ultimately to be “owned” by the countries.

VIII. Country Programmes

48. **Country programmes have the potential to offer a more** comprehensive picture of national needs and priorities than is achievable through a grant-by-grant or project-by-project approach.⁵⁶ Country programmes are often drafted in a participatory manner involving a wide range of national stakeholders.⁵⁷ In some cases, country programmes play a crucial role in aligning GCF investment criteria with national priorities and programmes.⁵⁸ In other cases, they

⁵² Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report.”

⁵³ Ibid.

⁵⁴ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the GCF's Investments in the African States.”

⁵⁵ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in Small Island Developing States.”

⁵⁶ Independent Evaluation Unit, “Independent Evaluation of the GCF's Readiness and Preparatory Support Programme.”

⁵⁷ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of the GCF's Readiness and Preparatory Support Programme: Country Case Studies.”

⁵⁸ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports”;

fail to effectively guide programming, either because they lack clear prioritization⁵⁹ or because the priority areas identified fall outside the scope of current GCF financing.⁶⁰

49. Importantly, country programmes are not a formal requirement for GCF programming, nor do they serve to streamline project approval processes,⁶¹ despite the common misconception that they are a prerequisite.⁶² The GCF operates a “first come, first served” model, compared to fixed country allocations and financial limits for grants or loans, except those set through accreditation for entities working in any country). This model has a greater influence on how countries plan their access to GCF funding than country programmes alone.⁶³

50. Furthermore, countries remain uncertain about the scale of funding they can realistically expect from the GCF. This lack of predictability complicates the development of country programmes⁶⁴ and undermines their usefulness in planning and securing financing for national priorities.

51. **Country programmes have to reconcile the national priorities with the priorities of AEs, which leads to weak linkages between country programmes and the GCF's actual approved programming.** Another reason for the disconnect between country programmes and funding proposals is that pipelines often include country programmes without prior consultation with the associated AEs.⁶⁵ In such cases, proponents of project ideas listed in country programmes need to search for an AE to implement them. In contrast, other project ideas are taken forward by IAEs despite this being a less preferred mode of programming for many countries.⁶⁶ When it comes to programming with IAEs countries often find their programming priorities to override those of countries, as laid out in their respective country programmes.⁶⁷ In summary, country programmes lack clarity of purpose.⁶⁸

52. Although country programmes are mechanisms designed to operationalize country ownership and guide pipeline development, there is no requirement to base GCF projects on them, and they are not yet embedded in the GCF business model. This reflects a difference

Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the GCF’s Investments in the African States.”

⁵⁹ Independent Evaluation Unit, “Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the GCF’s Investments in the African States.”

⁶⁰ Independent Evaluation Unit, “Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of Relevance and Effectiveness of the Green Climate Fund’s Investments in the Least Developed Countries.”

⁶¹ Independent Evaluation Unit, “Independent Evaluation of Relevance and Effectiveness of the Green Climate Fund’s Investments in the Least Developed Countries.”

⁶² Independent Evaluation Unit, “Independent Evaluation of the GCF’s Readiness and Preparatory Support Programme: Country Case Studies”; Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund.”

⁶³ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report.”

⁶⁴ Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund.”

⁶⁵ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in Small Island Developing States.”

⁶⁶ Independent Evaluation Unit, “Independent Evaluation of the GCF’s Readiness and Preparatory Support Programme: Country Case Studies.”

⁶⁷ Independent Evaluation Unit, “Independent Evaluation of Relevance and Effectiveness of the Green Climate Fund’s Investments in the Least Developed Countries.”

⁶⁸ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in Small Island Developing States”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the GCF’s Investments in the African States.”

between how country programmes are envisioned in theory and how they function in practice.⁶⁹

53. Within the GCF portfolio, several countries have taken a strategic approach to determining their climate programming priorities. In some instances, governments use existing national programmes and strategies as proxies for a GCF country programme. These programmes and strategies set the key priorities the country aims to finance through various sources, including the GCF.⁷⁰ An example of this approach is described in Box 2.

Box 2: R2RP - The Roof to Reef Programme - Barbados

In response to climate change challenges, the Government of Barbados launched the Roof to Reef Programme (R2RP) as its sustainable development model for the next decade. The R2RP provides an overarching and integrated framework for addressing climate change's negative social and environmental impacts, with a strong focus on improving the environmental and social wellbeing of the Barbadian people. By targeting six thematic areas – shelter, water, energy, waste, land use, and ecosystem management – the R2RP aligns with the key priorities of the country's NDCs. Endorsed at the highest level of government, the R2RP brings a holistic, multisectoral approach to climate action and serves as Barbados's country programme for the GCF.

Source: Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports – Barbados

IX. Multi-Stakeholder Consultations

54. There is some divergence in how stakeholders interpret multi-stakeholder consultations in the context of country ownership and how these consultations are put into practice. Many have noted that the operationalization of country ownership has occasionally over-emphasized government priorities without enabling broad-based stakeholder engagement with the GCF. Consequently, the GCF's implementation of this core principle has often been limited to central national governments, reducing opportunities for meaningful engagement with stakeholders relevant to climate change, such as CSOs, PSOs, Indigenous peoples and vulnerable communities.⁷¹ Multi-stakeholder consultations are considered important because on-the-ground and traditional knowledge, particularly from national, subnational or regional CSOs, is crucial for adaptation projects. Such knowledge may help mitigate environmental, social, and governance risks during project implementation. However, the inclusion of diverse stakeholders in project preparation and planning remains ad hoc, and the current interpretation of country ownership often defaults to a national government-led approach.⁷² Nevertheless, some country-level stakeholders maintain that federal governments, as the official parties to the United

⁶⁹ Independent Evaluation Unit, "Independent Evaluation of Relevance and Effectiveness of the Green Climate Fund's Investments in the Least Developed Countries."

⁷⁰ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

⁷¹ Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report"; Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund."

⁷² Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the GCF's Investments in the African States"; Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme"; Independent Evaluation Unit, "Second Performance Review of the Green Climate Fund."



Nations Framework Convention on Climate Change, should be the primary interlocutors with the GCF and its investment processes.⁷³

55. AEs have processes in place to ensure consultations are conducted with a wide range of stakeholders, including beneficiary communities. However, they only occur to the extent required by GCF's policies.⁷⁴ In some multi-country projects, stakeholder consultations for subprojects are conducted in line with the AE's internal procedures. However, these consultations often align more closely with the AE's operational focus rather than with stakeholders targeted by the GCF. As a result, such consultations may not be visible to the NDA or other stakeholders related to the GCF at the national level.⁷⁵

56. **Stakeholder consultations are shaped significantly by the country's consultation culture and institutional framework.** In some countries, the culture supports inclusive participation in sectoral planning, including climate-related initiatives. In other countries where a democratic and consultative culture has not sufficiently evolved, meaningful stakeholder engagement remains a challenge.⁷⁶ At the country level, there is often limited cooperation between NDAs and private-sector AEs, contributing to perceptions of weak country ownership in private-sector projects. This is particularly evident where international development banks execute private-sector projects through global or regional activities with minimal involvement from national actors. There is little communication and few well-defined reporting requirements between NDAs and the IAEs.⁷⁷ Location also influences the effectiveness of NDAs in stakeholder coordination. That being said, doubts have been raised about NDAs coordinating effectively with CSOs and the private sector, considering the power imbalances that often exist between the government, civil society, and business actors.⁷⁸ A country's consultation culture is clearly an important factor in determining the depth and effectiveness of multiple stakeholder engagement.

57. **Stakeholder engagement happens at specific points in the programming cycle and is seldom an ongoing process.** As covered in the analysis of the inherent tensions between AEs and NDA, in GCF programming, AEs tend to engage NDAs at the design stage, but such engagement declines as implementation begins. However, even beyond the role of NDAs, stakeholder engagement at the project level typically occurs during the design stage, as required by policy, but tends to decline during implementation. Moreover, non-NDA stakeholders often observe that engagement is largely "consultative" rather than involving them in co-implementation or governance roles.⁷⁹ An exception to this is when the project is intentionally designed to be participatory.⁸⁰ In some instances, a more incremental approach, such as stakeholder mapping, may be required to support meaningful and sustained participation.

58. **Proactive involvement of the GCF Secretariat is considered desirable for promoting country ownership.** Stakeholders often view the GCF Secretariat as disconnected

⁷³ Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report."

⁷⁴ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

⁷⁵ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF's Investments in the Latin American and Caribbean (LAC) States."

⁷⁶ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the Least Developed Countries: Country Case Studies."

⁷⁷ Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report."

⁷⁸ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the GCF's Investments in the African States."

⁷⁹ Ibid.; Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme."

⁸⁰ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the GCF's Investments in the African States."



from project beneficiaries, delegating all project activities to the AE rather than acting as an active and collaborative partner alongside it.⁸¹ With respect to stakeholder engagements, informants suggested that a more proactive approach to help guide the accredited and implementing entities in executing stakeholder consultations would be helpful. Stakeholders are also unable to budget for such engagement in GCF projects.⁸²

X. Multi-country programmes

59. **Multi-country projects often face challenges aligning with national needs and ensuring timely disbursement of financing.** Evaluations indicate that single-country and direct access projects are generally considered to align with national priorities and have national government support.⁸³ However, there is limited ownership and awareness of multi-country projects.⁸⁴ Some of the major problems faced by multi-country projects appear to be a lack of visibility and oversight of NDAs over the design and implementation of these projects⁸⁵ and a lack of relevance to national contexts.⁸⁶ There have been some cases where NDAs have refused to issue no-objection letters due to insufficient consideration given to country needs.⁸⁷ However, such instances are few. In some countries, certain kinds of multi-country programmes bypass national-level scrutiny processes.⁸⁸

60. Concerns regarding GCF multi-country projects include the following:

- (a) Concepts and designs are “pushed” by regional and international AEs, which challenges the notion of country ownership and that those designs are too homogenized.⁸⁹
- (b) The amount of funding per country is too small in currently approved projects to have a sustainable on-the-ground impact for local beneficiaries, and the high transaction costs in the countries are therefore not considered.

⁸¹ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the GCF’s Investments in the African States”; Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund.”

⁸² Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports.”

⁸³ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report.”

⁸⁴ Ibid.; Independent Evaluation Unit, “Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports.”

⁸⁵ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports”; Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund: Rwanda Country Case Study Report”; Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund: Morocco Country Case Study”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF’s Investments in the Latin American and Caribbean (LAC) States.”

⁸⁶ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports.”

⁸⁷ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report.”

⁸⁸ Independent Evaluation Unit, “Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports.”

⁸⁹ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in Small Island Developing States”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in the African States: Case Study Reports.”



- (c) GCF's requirement for no-objection letters from all participating countries as a precondition for approval can hinder a project's viability.⁹⁰
 - (d) Multi-country projects take a long time to develop. During this period, countries may shift resources or adjust their programmes. By the time the project is ready for implementation, these changes can make it difficult for countries to reorganize and participate in the project.⁹¹
 - (e) For multi-country projects, there is no fixed financing allocation for each country. Instead, the AE determines funding amounts during project implementation once local partners are identified and contracted – often without the knowledge of the NDA.⁹² This point further demonstrates that predictability of access is integral to country ownership.
61. The no-objection letter procedure does not solve the above challenges with multi-country projects.⁹³ In some countries, there is a perception that pressure to accept multi-country projects also comes from the GCF Secretariat.⁹⁴

XI. Private Sector and Country Ownership

62. **Private-sector projects face the same challenges with country ownership as multi-country projects.** Private-sector projects are often implemented as multi-country initiatives. Consequently, they tend to have low visibility among national stakeholders and limited engagement or ownership by national-level stakeholders.⁹⁵ In the context of country ownership, private-sector projects face the same problems highlighted earlier in relation to multi-country projects, particularly concerning the uncertainty of financial flows to countries, limited stakeholder awareness, and insufficient relevance to local priorities and contexts.
63. **Structural factors within countries and aspects of the GCF's design influence private-sector engagement and ownership.** The lack of predictability in the GCF accreditation process can deter private-sector involvement in GCF investments. NDAs often face difficulties in mobilizing private-sector actors due to limited institutional knowledge of financial instruments and weak links to the private sector.⁹⁶ Further, the private sector is also usually focused on short-term projects and funding, not long-term efforts that require significant lead-up time to

⁹⁰ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in Small Island Developing States."

⁹¹ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

⁹² Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the GCF's Investments in the African States"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the Least Developed Countries: Country Case Studies"; Independent Evaluation Unit, "Second Performance Review of the Green Climate Fund: Morocco Country Case Study."

⁹³ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund's Investments in the African States: Case Study Reports"; Independent Evaluation Unit, "Independent Evaluation of Relevance and Effectiveness of the Green Climate Fund's Investments in the Least Developed Countries."

⁹⁴ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

⁹⁵ Independent Evaluation Unit, "Forward-Looking Performance Review of the Green Climate Fund: Countries Report"; Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Approach to the Private Sector: Country Case Study Reports."

⁹⁶ Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund"; Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Approach to the Private Sector."



secure funding. Additionally, government decision makers often lack a clear understanding of how to involve the private sector in climate change projects.⁹⁷

64. As a result, the hurdles created by the GCF discourage many private sector actors from engaging.⁹⁸ Private-sector informants feel that consultations for climate change planning have not sufficiently included private-sector participation and that national plans would be stronger for it.⁹⁹

65. Overall, the private sector is not yet sufficiently integrated into GCF processes to adequately support country-owned and country-driven project development. There are no specific or systematic country-driven approaches in place to ensure that country priorities guide private-sector project origination. In practice, funding proposals are often developed by IAEs who consult with the private sector facility (PSF) or the Division of Mitigation and Adaptation (DMA) before the proposals are reviewed by the Division of Country Programming (DCP) and the relevant NDAs.¹⁰⁰

66. **The private sector's operating model and the incentives it has to programme in line with country priorities make it difficult to engage private sector actors.** Later in this report, the trade-offs in engaging countries through AEs and the ensuing implications for NDA engagement are discussed in more detail. In the context of private-sector programming, stakeholders note that while engagement with NDAs is essential to ensure alignment with national objectives, private-sector investments are largely driven by private-sector demand. Their limited interaction with NDAs in such cases may reflect a desire for more efficient project preparation and implementation, as well as a reluctance among some private-sector stakeholders to engage with the government.¹⁰¹

67. In many countries, adaptation remains a key focus. However, private-sector actors often find it difficult to engage in adaptation projects due to the difficulty in measuring impact, less predictable returns on investment, and the generally low bankability of such proposals.¹⁰² In addition, in many developing countries, the private sector is predominantly made up of micro, small, and medium enterprises, which present unique challenges for inclusion in country-level processes.¹⁰³

68. The GCF portfolio includes promising examples of inclusion and ownership within the private sector, particularly through public-private partnerships that demonstrate strong private sector or NDA leadership.¹⁰⁴ In many cases, this is achieved by involving private-sector actors in a public-private partnership to conduct programming that would otherwise be considered a public-sector responsibility.¹⁰⁵ Ensuring substantial alignment with NDCs at the implementation

⁹⁷ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

⁹⁸ Ibid.; Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Approach to the Private Sector: Country Case Study Reports."

⁹⁹ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

¹⁰⁰ Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Approach to the Private Sector."

¹⁰¹ Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Approach to the Private Sector: Country Case Study Reports."

¹⁰² Ibid.

¹⁰³ Independent Evaluation Unit, "Second Performance Review of the Green Climate Fund: Bangladesh Country Case Study Report."

¹⁰⁴ Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Approach to the Private Sector: Country Case Study Reports"; Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF's Investments in the Latin American and Caribbean (LAC) States."

¹⁰⁵ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF's Investments in the Latin American and Caribbean (LAC) States."

level requires enabling public-private partnerships, as the private sector cannot achieve this on its own.¹⁰⁶

XII. GCF, AEs and NDAs – An impossible trinity?

69. **The GCF business model of working with countries through AEs presents specific challenges to country ownership.** In some countries, national agencies wish to partner with an approved AE. Often, however, these entities are either not readily available or are unwilling to engage due to the high cost of interacting with the GCF. Potential AEs may avoid projects that do not fit with their strategic interests. This dynamic can dilute country ownership, as countries may be forced to navigate multiple sets of external criteria or retrofit national strategies to align with those of global AEs – effectively reversing the logic of country-driven programming.¹⁰⁷

70. Even when project ideas originate from within the country, including from government institutions, countries must often actively seek out AEs willing to work with the country.¹⁰⁸ Country priorities do not necessarily align with the preferences, capabilities or risk profiles of AEs or delivery partners. This has led, in some cases, to NDAs encouraging partners to submit proposals for which they are ill-suited and, in others, to partners pressuring NDAs to endorse proposals that are poorly targeted at country needs.¹⁰⁹

71. Moreover, IAEs often make use of their direct access to the GCF Secretariat to communicate project ideas, sometimes bypassing the NDA altogether or informing NDAs of pipeline developments too late in the design process.¹¹⁰

72. **NDA involvement in the lifecycle of projects and programmes varies.** The implementation of national priorities through the funding of the projects is overseen by the NDA, which is responsible for ensuring these priorities are addressed in proposals submitted to the GCF Secretariat and Board. However, beyond the no-objection procedure at the initial stage, the NDA has no formal role in the later phases of the GCF project cycle, such as reviewing the latest drafts of projects or monitoring initial or ongoing implementation. These subsequent processes are handled almost entirely between the AE and the GCF Secretariat. The NDA has no active role in the later stages of project design, which can lead to weakened integration of national priorities as proposals progress from the concept note to the detailed design and ultimately to the negotiation of the funded activity agreement.¹¹¹ This limited involvement often extends into the implementation stage.¹¹² Even in cases where NDA engagement is relatively

¹⁰⁶ Independent Evaluation Unit, “Independent Evaluation of the Green Climate Fund’s Approach to the Private Sector: Country Case Study Reports.”

¹⁰⁷ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in Small Island Developing States.”

¹⁰⁸ Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports.”

¹⁰⁹ Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund.”

¹¹⁰ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund: Morocco Country Case Study”; Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund: Vietnam Country Case Study Report.”

¹¹¹ Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Independent Evaluation of the Relevance and Effectiveness of the Green Climate Fund’s Investments in the Least Developed Countries: Country Case Studies.”

¹¹² Independent Evaluation Unit, “Forward-Looking Performance Review of the Green Climate Fund: Countries Report”; Independent Evaluation Unit, “Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports”; Independent Evaluation Unit,



strong during project design, such involvement declines once implementation begins.¹¹³ The extent of the NDA's participation often depends on the strength of its relationship with the AE.¹¹⁴

73. However, there are instances where stakeholders have communicated the need for better communication from NDA to the AE as well. This is especially outlined in the need for AEs to be better informed of the national priorities to give AEs more confidence to invest their resources in project development.¹¹⁵ Even when working through RPSP, concept notes are often developed at the behest of the NDAs without the involvement of the potential AEs who could design the project.¹¹⁶

74. **AEs serve as the primary interlocutor with the GCF Secretariat, which has led to confusion around the respective roles of NDAs and AEs in advancing programming and ownership.** By channelling engagement primarily through AEs, the GCF positions them as gatekeepers of both knowledge and access to the Fund, making national stakeholders – beyond the NDA – heavily dependent on the lead AE to navigate GCF requirements. All communication between the GCF and national stakeholders outside of the NDA is usually mediated through AEs, creating a disconnect and a potential communication bottleneck.¹¹⁷

75. In some cases, AEs have assumed roles traditionally held by NDAs, including leading knowledge exchange, facilitating collaboration with government and civil society, and initiating education, training and capacity-building activities relevant to climate projects. Many also engage in efforts to establish public-private partnerships. In some instances, AEs have become the main point of contact for discussing activities, functions, roles and responsibilities that would ordinarily fall within the purview of the NDA or focal point.¹¹⁸ This entity-focused engagement in the GCF's business model also extends to RPSP, where interactions have historically focused on the delivery partner rather than the country's institutions.¹¹⁹ Box 3 provides an example of how NDAs can be undermined.

"Independent Evaluation of the Green Climate Fund's Approach to the Private Sector: Country Case Study Reports"; Independent Evaluation Unit, "Second Performance Review of the Green Climate Fund: Morocco Country Case Study."

¹¹³ Independent Evaluation Unit, "Independent Evaluation of Relevance and Effectiveness of the Green Climate Fund's Investments in the Least Developed Countries"; Independent Evaluation Unit, "Second Performance Review of the Green Climate Fund: Morocco Country Case Study."

¹¹⁴ Independent Evaluation Unit, "Independent Evaluation of the Adaptation Portfolio and Approach of the Green Climate Fund: Virtual Country Case Study Reports."

¹¹⁵ Independent Evaluation Unit, "Independent Evaluation of the Relevance and Effectiveness of GCF Investments in Small Island Development States: Country Case Study Reports."

¹¹⁶ Ibid.

¹¹⁷ Ibid.

¹¹⁸ Independent Evaluation Unit, "Independent Evaluation of the Green Climate Fund's Energy Sector Portfolio and Approach."

¹¹⁹ Independent Evaluation Unit, "Independent Evaluation of the GCF's Readiness and Preparatory Support Programme."



Box 3: Undermining the NDAs' role – Solomon Islands

The experience of FP 044, the “River Hydropower Development Project” in Solomon Islands, illustrates significant shortcomings in the current GCF business model. Although the project was designed by the World Bank with GCF funding, government representatives were not permitted in the room to respond to Board queries and, further, were excluded from last minute GCF-World Bank negotiations on key proposal details. This exclusion prompted strong calls for greater inclusion of NDAs as partners in arrangements between GCF and the AE. This example highlights the broader concern that, in practice, the GCF business model may not be functioning optimally to uphold the principle of country ownership.

Source: Forward-Looking Performance Review of the Green Climate Fund: Countries Report - Solomon Islands

76. The lack of visibility and involvement of NDAs throughout the project lifecycle often precludes the meaningful participation of other stakeholders. In the absence of strong country monitoring systems, NDAs are not in a position to facilitate stakeholder engagement or ensure projects remain aligned with national priorities during implementation.

77. **In addition, differences in the preferences and expectations between the GCF, AEs and delivery partners further complicate implementation.** Tensions within the business model are evident not only in country relationships but also in the partnerships between the GCF and the AEs themselves. AEs may view their role as a purely transactional conduit for implementing GCF projects. However, the GCF business model assumes they will collaborate more strategically.¹²⁰ This misalignment reinforces the inherent tension in the GCF’s operating model between AE ownership and country ownership.

¹²⁰ Independent Evaluation Unit, “Second Performance Review of the Green Climate Fund.”



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- Annex XX, Decision B.17/21: Guidelines for Enhanced Country Ownership and Country Drivenness
- B.08/10: Country ownership: Best-practice options for country coordination and multi-stakeholder engagement
- B.08/11: Revised programme of work on readiness and preparatory support
- B.09/05: Further development of the initial investment framework: Sub-criteria and methodology
- B.12/20: Strategic Plan for the Green Climate Fund

GCF Board Documents

- GCF/B.04/04: Business Model Framework: Country Ownership
- GCF/B.12/06: Report on the development of the Draft Strategic Plan for the Green Climate Fund Submission from the ad hoc group of Board/Alternate members

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