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SECOND PERFORMANCE REVIEW OF THE GREEN CLIMATE FUND

Country case study report

Bangladesh

January 2023

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Second Performance Review of the Green Climate Fund

BANGLADESH COUNTRY CASE STUDY REPORT

01/2023

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CONTENTS

Abbreviations	v
A. Introduction	1
B. Background and context.....	1
1. Country context.....	1
2. Climate change priorities, policies and institutions	2
a. Climate vulnerability	2
b. National climate change and related policies	2
c. Institutional roles and responsibilities for climate change	4
3. Climate finance context.....	4
a. Support for readiness	4
b. Climate investment	4
c. GCF portfolio	6
C. Key findings.....	8
1. Country needs, ownership and strategy.....	8
a. Links of GCF programming to broader climate strategy and finance processes.....	8
b. Perceived comparative advantage of the GCF in country	9
c. Effectiveness of the NDA, Secretariat and AE roles and relationship at the country level	11
2. Improving access to the GCF.....	12
a. Access to AEs that cover country programming priorities for the GCF	12
b. Meeting DAEs' needs for capacity-building to access the GCF	13
3. Programming and implementation	14
a. Meeting country programming needs through GCF readiness support.....	14
b. Effectiveness of processes for funding proposal origination, development and appraisal to meet country needs	14
c. Sufficiency of funded activity implementation and supervision processes.....	16
4. Progress towards results and impact of GCF investments	17
a. Evidence that intended outputs and outcomes have been achieved/are likely to be achieved ..	17
b. Progress of funded activities towards paradigm shift.....	20
c. Women and other vulnerable populations, including indigenous peoples	22
d. Catalysing public and private finance	22
e. Knowledge management and learning efforts within GCF funded activities.....	23
D. Emerging lessons for the GCF	23
APPENDIX 1. LIST OF INTERVIEWEES	25
REFERENCES	27

TABLES

Table 1.	Overview of Bangladesh country context	1
Table 2.	Bangladesh national climate change policies and strategies	2
Table 3.	Top development partners, sectors and instruments for adaptation investment in Bangladesh (2016–2019).....	5
Table 4.	Top development partners, sectors and instruments for mitigation investment in Bangladesh (2016–2019).....	5
Table 5.	National DAEs for Bangladesh	6
Table 6.	RPSP grants to Bangladesh	6
Table 7.	PPF grants received by Bangladesh.....	7
Table 8.	Bangladesh’s funded activity portfolio.....	8
Table 9.	Summary of evidence of outcomes	18
Table 10.	Summary of evidence of dimensions of paradigm shift	21

BOXES

Box 1.	Local and national knowledge merge in Dushtha Shasthya Kendra	20
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ABBREVIATIONS

AE	Accredited entity
APR	Annual progress report
CCAG	Climate Change Adaptation Groups
CIF	Climate Investment Funds
CN	Concept note
CP	Country programme
DAE	Direct access entity
EE	Executing entity
ERD	Economic Relations Division
ESS	Environmental and social safeguards
FAA	Funded activity agreement
FAO	Food and Agriculture Organization of the United Nations
FP	Funding proposal
GCF	Green Climate Fund
GDP	Gross domestic product
GEF	Global Environment Facility
IAE	International accredited entity
IDCOL	Infrastructure Development Company Limited
IEU	Independent Evaluation Unit
IRM	Initial resource mobilization
LGED	Local Government Engineering Department
MDB	Multilateral development bank
NAP	National adaptation plan
NDA	National designated authority
NDC	Nationally determined contribution
PKSF	Palli Karma-Sahayak Foundation
PPF	Project Preparation Facility
PSF	Private Sector Facility
RPSP	Readiness and Preparatory Support Programme
SAP	Simplified approval process
SPR	Second Performance Review
UNDP	United Nations Development Programme

A. INTRODUCTION

This country case study has been conducted as an input into the Second Performance Review (SPR) of the Green Climate Fund (GCF), as launched by the Board of the GCF through decision B.BM-2021/11. The SPR is being conducted by the GCF’s Independent Evaluation Unit (IEU). The SPR focuses on assessing the progress made by the GCF in delivering on its mandate, as well as the results of the GCF, including its funded activities and its effectiveness and efficiency. The SPR is informed by multiple data sources and methods, including country case studies.

This report is based on desk review, interviews (see annex 1) and a hybrid country mission undertaken from 17 May to 9 June 2022. The country mission team included Peter Weston (lead consultant for ICF), Viktoriya Khan and Yeonji Kim (GCF IEU) – all of whom undertook remote interviews with key institutional stakeholders. SM Jakaria (ICF national consultant) supported coordination and communication in country, attended remote interviews and undertook two project site visits and related on-site interviews with implementers and intended beneficiaries. The report benefited from findings by an earlier IEU country case study conducted during the GCF Forward-looking Performance Review in 2019.

B. BACKGROUND AND CONTEXT

This section presents information to help contextualize Bangladesh’s experience with the GCF, including background on the country (Table 1), climate change and climate finance contexts.

1. COUNTRY CONTEXT

Table 1. Overview of Bangladesh country context

CATEGORY	COUNTRY
Demographics	<ul style="list-style-type: none"> • Eighth most populous country worldwide, with more than 165 million people (2022 estimate); ~40 per cent of the population lives in urban areas (Central Intelligence Agency, 2022).
GCF group status	<ul style="list-style-type: none"> • Least developed country
Governance conditions	<ul style="list-style-type: none"> • As per World Bank governance indicators, Bangladesh ranks in the lowest quarter for control of corruption (17th percentile), government effectiveness (20th percentile), political stability and absence of violence/terrorism (16th percentile), and regulatory quality (16th percentile). The country ranks slightly higher for rule of law (31st percentile) and voice and accountability (27th percentile) (World Bank, 2022c).
Economic and development conditions	<ul style="list-style-type: none"> • Development status: Lower-middle-income country (World Bank, 2022a). • Key sectors by gross domestic product (GDP) contribution (2017): industry (29 per cent), services (57 per cent), agriculture (14 per cent) (Central Intelligence Agency, 2022). • Economic outlook: Bangladesh had an average GDP growth rate of 6.9 per cent between 2012 and 2019. Its economy experienced a sharp decline in 2020 – likely related to the COVID-19 pandemic – with GDP growth slowing to 3.5 per cent, but it rebounded in 2021, with a growth rate of 6.9 per cent (World Bank, 2022b).
Access to finance	<ul style="list-style-type: none"> • Development is primarily publicly funded/led, with relatively low private sector investment. In-country finance requires considerable effort to bolster its

CATEGORY	COUNTRY
	<p>prevalence and impact (International Monetary Fund, 2022).</p> <ul style="list-style-type: none"> Public debt (2017 est.): 33 per cent of GDP (Central Intelligence Agency, 2022). World Bank Ease of Doing Business Index: 168 (out of 190) (World Bank, 2021a).

2. CLIMATE CHANGE PRIORITIES, POLICIES AND INSTITUTIONS

a. Climate vulnerability

Bangladesh is among the world’s most vulnerable countries to the impacts of climate change due to several factors, including its unique geography, the prevalence of flood plains (it is the largest deltaic region in the world), low elevation, high population density, poverty and dependence on nature and natural resources (Bangladesh, Ministry of Environment, Forest and Climate Change, 2018). Rising sea levels, shifting precipitation patterns and extreme weather are of particular concern, as catastrophic flooding, natural disasters and extreme weather events (e.g. tropical cyclones, storm surges) are becoming increasingly frequent and having more devastating consequences. These challenges also pose a threat to the lives and livelihoods of millions of people across Bangladesh and jeopardize their economic growth and sustainable development (Bangladesh, Ministry of Environment, Forest and Climate Change, 2018). The country’s high vulnerability to climate impacts was evidenced by the devastating floods that inundated the country at the time of this case study.¹

b. National climate change and related policies

The Government of Bangladesh developed a climate change strategy and action plan in 2008, three years after the development of their national adaptation programme of action, underscoring the domestic understanding of the threats posed to the country by climate change. Bangladesh also recently released the *Mujib Climate Prosperity Plan*, during the country’s second tenure as president of the Climate Vulnerable Forum. The plan outlines a countrywide approach towards increasing climate resilience and prescribes an expansive financial framework (Climate Vulnerable Forum & Vulnerability Twenty Group Presidency of Bangladesh, 2021). There are also several other climate-related domestic policies. The Government of Bangladesh has submitted three nationally determined contributions (NDCs) and national communications, and a national adaptation plan (NAP) was recently approved by the Government. While Bangladesh’s significant climate vulnerability is well documented throughout the documents summarized below, mainstreaming of climate change throughout national policies remains insufficient (Bangladesh, Ministry of Environment, Forest and Climate Change, 2018). The strategies in Table 2 identify and describe the climate-related priorities for Bangladesh.

Table 2. Bangladesh national climate change policies and strategies

STRATEGY	STATUS	BRIEF DESCRIPTION
National climate policies	Enacted	Bangladesh Climate Change Strategy and Action Plan. This plan describes the country context and likely implications/impacts of climate change, provides an overview of differing adaptation strategies and

¹ In June 2022, heavy rainfall across South Asia, reportedly the worst in 122 years, caused river flooding that left a quarter of Bangladesh’s population inundated or cut off and led to the deaths of at least 32 people (Wires/ABC, 2022).

STRATEGY	STATUS	BRIEF DESCRIPTION
		<p>briefly outlines mitigation issues. It also outlines a 10-year programme (2009–2018) to build capacity and resilience to climate change over the next 20–25 years, across six thematic pillars (Bangladesh, Ministry of Environment and Forests, 2009a).</p> <p>Perspective Plan of Bangladesh 2021–2041. The Perspective Plan outlines Bangladesh’s Vision 2041 and its intention to eliminate extreme poverty and become a developed country by 2041. The Plan outlines economic growth targets, strategies and sectoral objectives, and includes an environmental management and climate change strategy, which emphasizes the need to integrate environment and climate change considerations into the growth strategy and to develop a “green growth” strategy (General Economics Division, Bangladesh Planning Commission, 2020).</p> <p>Bangladesh Delta Plan 2100. This plan outlines a 100-year long-term development plan that reiterates a number of the high-level objectives outlined in the Perspective Plan. It also includes a number of additional specific goals related to the environment and climate change (General Economics Division, Bangladesh Planning Commission, 2022).</p> <p>Mujib Climate Prosperity Plan. This plan seeks to reduce vulnerability, bolster resilience and pursue prosperity across six priority areas: accelerated adaptation; public expenditure on the most vulnerable; comprehensive climate change and disaster risk financing/management; technological advancements; economic expansion and green jobs; and maximizing renewable energy, energy efficiency and power/transportation sector resilience. It also includes a strategic investment framework to mobilize finance for renewable energy and climate resilience activities (Climate Vulnerable Forum & Vulnerability Twenty Group Presidency of Bangladesh, 2021).</p>
Nationally determined contribution (NDC)	Submitted August 2021	<p>The updated NDC covers energy; industrial processes and product use; agriculture, forestry and other land use; and waste. It commits to an unconditional reduction of 27.56 MTCO_{2e} below business as usual in 2030 and a conditional added 34.34 MTCO_{2e}, provided external financial and technical support is accessible and available (Bangladesh, Ministry of Environment, Forest and Climate Change, 2021).</p>
Third National Communication	Submitted June 2018	<p>The Third National Communication aggregates and summarizes the mitigation and adaptation actions taken in Bangladesh to address climate change (Bangladesh, Ministry of Environment, Forest and Climate Change, 2018).</p> <ul style="list-style-type: none"> • Mitigation: The national communication notes the country’s low level of emissions and exemption from mitigation as a least developed country; however, greenhouse gas scenario analyses show business-as-usual emissions for power, transport and industry are to increase by a combined 264 per cent between 2011 and 2030 and indicate mitigation actions are possible, predicated upon availability and access to funding from national and international sources. • Adaptation: The national communication reiterates Bangladesh’s high level of climate vulnerability and acknowledges the considerable efforts made to increase resilience, including over USD 10 billion in investments to make the country more climate resilient and less vulnerable to natural disasters (e.g. construction of flood management embankments and cyclone shelters). The national communication also indicates 14 key areas of intervention and 16 corresponding priority actions for adaptation.

c. Institutional roles and responsibilities for climate change

The Ministry of Environment, Forest and Climate Change is the central government entity responsible for all matters related to the environment. It sets the climate change strategy for the country and oversees the implementation of environment and climate change related actions (Bangladesh, Ministry of Environment and Forests, 2008; World Bank, 2021b; Bangladesh, Ministry of Environment, Forest and Climate Change, 2018). Several agencies within the Ministry – including the Department of Environment, the Forest Department and the Department of Disaster Management – are responsible for preparing national communications and formulating climate change documents (e.g. the NDC and NAP). They also provide approval for disaster management and related projects, and facilitate mainstreaming of climate change at the sectoral level (Bangladesh, Ministry of Environment, Forest and Climate Change, 2018). The relatively limited human and institutional capacity for understanding, analysing and addressing climate change remains a challenge in Bangladesh (Bangladesh, Ministry of Environment, Forest and Climate Change, 2018).

3. CLIMATE FINANCE CONTEXT

a. Support for readiness

Bangladesh ranks in the lowest quadrant among developing countries in terms of readiness for climate finance. It has an ND-Gain score of 36.5, giving it a rank of 164th overall and making it the 24th least ready country while also being the 26th most vulnerable (University of Notre Dame, 2022). Bangladesh also ranks 7th among countries in terms of climate vulnerability according to the Global Climate Risk Index. Following COP26, Bangladesh was selected as one of five pioneer countries for a task force on access to climate finance, which will provide capital grants to climate-vulnerable countries to support the delivery of national climate plans (Steering Committee of the Taskforce on Access to Climate Finance, 2021). Bangladesh has also received considerable support from the GCF's Readiness and Preparatory Support Programme (RPSP) to strengthen institutional capacities, enable greater financial access and support development of the NAP (Bangladesh, National Designated Authority to GCF, 2018).

b. Climate investment

Bangladesh is one of the largest climate finance recipients in the world and receives funds from a range of donors, including the multilateral development banks (MDBs), Global Environment Facility (GEF), Climate Investment Funds (CIF) and a variety of bilateral sources (e.g. the United Kingdom's Foreign, Commonwealth and Development Office, USAID and *Gesellschaft für Internationale Zusammenarbeit* (commonly known as GIZ)) (Bangladesh, National Designated Authority to GCF, 2018). A total of USD 5.19 billions of development finance targeting climate change was allocated to Bangladesh between 2016 and 2019. The three largest funders of climate-related development finance in Bangladesh are the International Development Association (USD 2.27 billion), Asian Development Bank (USD 2.02 billion) and the Government of Germany (USD 259 million) (Stockholm Environment Institute, 2022). Bangladesh has mobilized domestic resources for climate change action, including through the Bangladesh Climate Change Trust Fund and the Bangladesh Country Investment Plan for Environment Forestry and Climate Change, which provides a strategic framework for planning and coordinating national and international investments related to the environment and climate change (Bangladesh, National Designated Authority to GCF, 2018). Despite Bangladesh's heavy investment in its own climate change adaptation via public

funds,² its Ministry of Finance, citing World Bank data, estimates that the country still requires five times more funding from all sources (Bangladesh, Ministry of Finance, 2021).

Adaptation. Development finance commitments targeting climate adaptation totalled USD 2.05 billion from 2016 to 2019 (see Table 3). In the same period, the GCF’s adaptation investments totalled USD 75 million.

Table 3. Top development partners, sectors and instruments for adaptation investment in Bangladesh (2016–2019)

TOP DEVELOPMENT PARTNERS		TOP SECTORS		TOP INSTRUMENTS	
Name	USD (M)	Name	Share (%)	Name	Share (%)
World Bank	1,250	Agriculture, forestry and fishing	19.6	Multilateral development bank loans	78.9
Asian Development Bank	468	Water supply & sanitation	17.1	Official development assistance grants	9.8
Germany	168	Transport & storage	16.4	Multilateral development bank grants	6.2
United States	48	Multi-sector/cross-cutting	9.1	Official development assistance loans	5.0
Denmark	36.7	Other social infrastructure & services	7.4	Private development finance	0.16

Source: Stockholm Environment Institute (2022). Aid Atlas.

Mitigation. Non-GCF development finance commitments targeting climate mitigation totalled USD 3.21 billion from 2016 to 2019 (see Table 4). Since the start of GCF, the mitigation investments totalled USD 256 million. GCF investments in cross-cutting projects totalled USD 37.6 million.

Table 4. Top development partners, sectors and instruments for mitigation investment in Bangladesh (2016–2019)

TOP DEVELOPMENT PARTNERS		TOP SECTORS		TOP INSTRUMENTS	
Name	USD (M)	Name	Share (%)	Name	Share (%)
Asian Development Bank	1,550	Transport & storage	47.9	Multilateral development bank loans	85.7
World Bank	1,020	Energy	27.3	Official development assistance loans	8.7
Japan	184	Agriculture, forestry and fishing	7.7	Official development assistance grants	5.1

² Ministry of Finance reporting states that the country spends around USD 1 billion per year of public funding on climate adaptation initiatives.

TOP DEVELOPMENT PARTNERS	TOP SECTORS	TOP INSTRUMENTS
European Investment Bank	125 Unspecified	3.9 Multilateral development bank grants
Germany	91.7 Multisectoral/cross-cutting	3.4 -

Source: Stockholm Environment Institute (2022). Aid Atlas.

c. GCF portfolio

National designated authority (NDA). The NDA in Bangladesh is located in the Economic Relations Division (ERD) of the Ministry of Finance.

Accredited entities. In addition to international accredited entities (IAEs) and regional direct access entities (DAEs), Bangladesh has access to two national DAEs (Table 5).

Table 5. National DAEs for Bangladesh

NAME OF DAE	DATE OF ACCREDITATION
Infrastructure Development Company Limited	6 July 2017
Palli Karma-Sahayak Foundation	2 October 2017

Readiness and project preparation. Bangladesh has received more readiness support from the GCF than other Asia-Pacific countries have received on average.³ Bangladesh has had seven RPSP grants approved (see Table 6) for a total of USD 5.1 million, of which USD 4.4 million has been disbursed.

Bangladesh developed a GCF country programme (CP) in 2018. Bangladesh has also received support from three Project Preparation Facility (PPF) grants (see Table 7).

Table 6. RPSP grants to Bangladesh

RPSP GRANT NAME	DELIVERY PARTNER	APPROVAL DATE	OUTCOME AREAS
Country Programming	United Nations Development Programme	1 December 2015	NDA strengthening, including country programming
NDA Strengthening	<i>Deutsche Gesellschaft für Internationale Zusammenarbeit</i> (GIZ) GmbH	17 July 2016	NDA strengthening, including country programming
Support for accreditation of direct access entities	PricewaterhouseCoopers	14 December 2016	Support for DAEs
Formulation and advancement of NAP process in Bangladesh	United Nations Development Programme (UNDP)	9 February 2018	Adaptation planning
Up scaling regulatory landscape of Green Banking for Shariah Based	Bangladesh Bank	14 June 2019	Strategic framework

³ On average, Asia-Pacific countries have received USD 0.7 million in GCF readiness financing. Source: IEU DataLab, RPSPs approved for 2015 to 2022.

RPSP GRANT NAME	DELIVERY PARTNER	APPROVAL DATE	OUTCOME AREAS
Banks and Financial Institutions in Bangladesh			
Strengthening the capacity of PKSF, Executing Entities (EEs) and Implementing Entities for effective participation of GCF activities in Bangladesh	Palli Karma-Sahayak Foundation	18 December 2019	NDA strengthening, including country programming
Strengthening Bangladesh's NDA Secretariat, Enhancing Pipeline Implementation and Private Sector Engagement in Effective Climate Action	Food and Agriculture Organization of the United Nations	3 September 2020	-

Source: IEU DataLab

Table 7. PPF grants received by Bangladesh

PPF	NAME	PUBLIC/ PRIVATE	ADAPTATION/ MITIGATION	APPROVAL DATE / STATUS
PPF014	Promoting private sector investment through large scale adoption of energy saving technologies and equipment for textile sector of Bangladesh	Private	Mitigation	5 November 2018: PPF completed; funding proposal submitted
PPF021	Promoting private sector investment through large scale adoption of energy saving technologies and equipment for garment sector of Bangladesh	Private	Mitigation	15 May 2019: PPF not completed; funding proposal submitted
PPF023	Climate Resilient Sustainable Coastal Forestry in Bangladesh	Public	Cross-cutting	14 June 2019: disbursed

Source: IEU DataLab

Funding proposals (FPs). Bangladesh has received more GCF financing than other Asia-Pacific countries have received on average, and was relatively early in accessing the GCF with its first FP approval in 2015.⁴ Six projects have been approved for Bangladesh (see Table 8) for a total of USD 368.6 million in GCF financing, of which five are national projects and one is a multi-country project. Of the six approved projects, three have commenced implementation. They are FP004, FP069 and SAP008.

Bangladesh has 10 concept notes (CNs) and three FPs. The pipeline shows how significantly the country plans to depend on DAEs for the future of its GCF programme. Of the four proposals for funding, the simplified approval process (SAP) and the RPSP, three are by DAEs. Similarly, of the 10 CNs, all but 2 are from DAEs.

⁴ On average, Asia-Pacific countries have received USD 104.3 million in GCF financing. Source: IEU DataLab, finance by results area for 2015 to 2022.

Table 8. Bangladesh’s funded activity portfolio

FP	NAME	SINGLE/ MULTI- COUNTRY	PUBLIC/ PRIVATE	ADAPTATION/ MITIGATION	AE	APPROVAL DATE
FP004	Climate-Resilient Infrastructure Mainstreaming in Bangladesh	S	Public	Adaptation	KfW Development Bank	5 November 2015
FP069	Enhancing adaptive capacities of coastal communities, especially women, to cope with climate change induced salinity	S	Public	Adaptation	UNDP	1 March 2018
FP070	Global Clean Cooking Program – Bangladesh	S	Public	Cross-cutting	World Bank	1 March 2018
FP150	Promoting private sector investment through large scale adoption of energy saving technologies and equipment for Textile and Readymade Garment (RMG) sectors of Bangladesh	S	Private	Mitigation	IDCOL	13 November 2020
FP177	Cooling Facility	M	Public	Cross-cutting	World Bank	7 October 2021
SAP008	Extended Community Climate Change Project-Flood (ECCCP-Flood)	S	Public	Adaptation	PKSF	14 November 2019

Source: IEU DataLab

C. KEY FINDINGS

1. COUNTRY NEEDS, OWNERSHIP AND STRATEGY

a. Links of GCF programming to broader climate strategy and finance processes

Currently, GCF programming is adequately linked to broader climate strategy and finance processes in Bangladesh. The GCF’s RPSP was instrumental in supporting Bangladesh to develop a CP during the initial resource mobilization (IRM) period, as well as a NAP and a new CP in the GCF-1 period. Both instruments will be practical in facilitating connections between national climate action priorities, offers of climate finance support (from the GCF and other sources) and potential implementing entities. Several interview partners praised the NAP update process as an important strategic contribution from the GCF that will make the country’s plans more concrete than the NDC and will counterbalance the primacy of mitigation in the NDC.

The 2018 CP was a key driver behind pursuing Bangladesh’s current suite of six approved FPs. As indications of country ownership, two of the six FPs are driven by the DAEs identified and accredited with support from the RPSP; three IAE projects are seen as highly specific to Bangladesh, with close consultation and alignment with country stakeholders; and one FP is a multi-

country project that fits the national context. The 2018 CP, however, has become outdated and does not accommodate newer national climate action instruments have been developed since then. The RPSP project led by the Food and Agriculture Organization of the United Nations (FAO) will include updating the GCF CP to reflect these new national climate strategy instruments – a process expected to begin in the second half of 2022.

Informants commented that current GCF projects only include a few government ministries (e.g. Women and Children’s Affairs and Local Government Engineering), with stakeholders such as the departments of environment, water and agriculture not well engaged. However, several informants also noted that government ministries shy away from engaging with GCF proposals due to the level of complexity and compliance requirements. GCF due diligence requirements are respected for their stringency but can be a disincentive when ministries do not have sufficient processes in place and can access funds from bilateral donors and MDBs with less complexity. An informant further explained that decision makers in government ministries generally do not understand what climate vulnerabilities and climate adaptation options are relevant to their sector, so do not know what interventions to propose to the GCF.

In the past, the GCF Secretariat has primarily played a facilitating role in Bangladesh with respect to the upstream programming process and aligning GCF partners and programmes with national and/or country strategy objectives, but this has lessened in GCF-1. An interview partner involved with the RPSP expressed that GCF facilitation of linkages between Bangladesh and AEs has lessened over time, and momentum has been lost largely due to dynamics beyond the GCF’s control. A key partner noted that a lot of collaboration momentum with government offices reduced during the COVID-19 pandemic, once all meetings had to shift online instead of being held face-to-face. This led to a slowdown for GCF planning and capacity-building processes. Additionally, in 2021, all key managers in the NDA secretariat were replaced, requiring new relationships to be built between the NDA and RPSP, AE and GCF partners. Interviews indicated that recent face-to-face meetings post-COVID lockdowns are improving engagement.

Bangladesh’s GCF portfolio shows some evidence of complementarity with other climate finance channels. Housing the NDA secretariat in the Ministry of Finance’s ERD means that GCF programming coordination is overseen by the same group as all other external climate finance and other external development finance. An additional advantage of nesting the NDA in the ERD is that RPSP capacity-building investment in the NDA translates into improving the country’s coordination capacity for all climate finance.

However, international and national informants expressed that the comparatively slow proposal and start-up timing of the GCF projects makes it difficult for implementers to plan GCF funding into a wider programmatic approach with other initiatives. An international informant noted that the MDBs channel greater amounts of funding into Bangladesh than the GCF and are increasing the amount of their finances directed to climate change specifically. Climate finance is also coming in from the International Fund for Agricultural Development and bilateral donors, for example. A national stakeholder noted that government ministries in Bangladesh attempt to accommodate the slow pace of GCF finances by stepping in with other finance to ensure complementary non-GCF projects do not suffer.

b. Perceived comparative advantage of the GCF in country

Compared to other climate finance channels, stakeholders in Bangladesh report that the comparative advantages of the GCF are as follows:

- **Funding climate-resilient infrastructure.** An international informant expressed that the GCF is relatively uniquely positioned among dedicated climate financiers in being willing to fund projects with high infrastructure targets.

- **The credibility gained by implementing agencies.** A national informant noted that agencies that successfully navigate the high standards of the GCF are better positioned to compete for other climate finance too.
- **The capacity to finance very large projects** compared to other climate finance mechanisms such as the Adaptation Fund, GEF and the Clean Development Mechanism, which are all capped at below USD 30 million per project (or less). This is considered a key motivation for national and international informants to persevere in working with the GCF.
- **The GCF's ability to provide grant funds, in addition to loans and equity.** International and national informants noted that grants enable the GCF to support initiatives that MDBs cannot, and also often complement climate loans for important project components that loans cannot cover. Many interviewees considered grant-based finance as crucial for fragile countries such as Bangladesh. Although provision of concessional loans for financing climate action was considered an advantage too, the competitive advantage of the GCF is the ability to fund interventions on grant-basis. One multilateral partner expressed disappointment at being offered a loan rather than a grant given Bangladesh's local context, as they can access loans from other sources.
- **The GCF's focus on climate mitigation and adaptation.** National informants consider mitigation and adaptation to be crucial foci for Bangladesh's future, with adaptation the priority.
- **GCF compliance requirements result in full transparency** regarding where GCF funding ends up and what it achieves. Two national informants contrasted this to government funding for climate action and even some other international finance channels, which make it more difficult to trace where funds are spent.

The GCF is perceived as less well positioned in Bangladesh in the following areas:

- **GCF modalities are not well suited to pilot new ideas that would then scale up.** An informant noted that the country would benefit from investment in innovation to pilot new ideas to potentially scale up and recommended that the GCF adopt an innovation fund modality. The informant felt that none of the GCF modalities primarily allowed for innovation development – perhaps due to the high levels of justification required for GCF proposals, which can only be obtained for well-tested solutions.
- **The GCF's lengthy processes and associated costs disincentivize engagement.** National and international informants stated that some IAEs have decided to not pursue new GCF opportunities in Bangladesh due to the large time investment and high transaction costs of doing so. National informants also noted that the same perception of GCF complexity discourages government ministries in Bangladesh from becoming involved in GCF proposals and does not align with the Government's own financial reporting and auditing protocols. An international informant noted more project resources are spent on documentation and technical studies for GCF compliance, which diverts funding away from implementation. As noted above, the long time frames also make it difficult to align with other funding initiatives.
- **GCF funding, as well as AE processes, are not sufficiently flexible to adapt to diverse and changing needs at the local level.** National and international informants noted that working with farmers or urban residents requires a level of adaptability in how project funds are used location by location. There are no such ready mechanisms in place to detect and adjust to such variation on project or AE level. More DAEs who focus on the local level, such as non-governmental organizations, could help address this dynamic.

- **The GCF does not have officers in country.** A national informant stated that this makes the GCF a less preferred partner because face-to-face dialogue is very important for conveying information and resolving concerns.
- **GCF requirements are not well suited for private sector engagement.** Informants mentioned several points that may discourage private sector engagement. First, GCF loans fixed in US dollars may lose their concessional advantage because the Bangladeshi currency has devalued over time, which makes the GCF unattractive to the private sector (or IAEs), who can secure similar loans from local banks without GCF compliance requirements.⁵ The environmental and gender requirements of the environmental and social safeguards (ESS) policy also discourage the private sector in Bangladesh. While implementers recognize the big-picture benefit of these requirements, their associated costs are not expenses businesses would otherwise need to accommodate.

c. Effectiveness of the NDA, Secretariat and AE roles and relationship at the country level

NDA staffing and technical capacity in Bangladesh have stayed the same since the IRM period; overall capacity is moderate. National informants stated that the NDA is active and communicative with the government offices that are engaged in GCF programming, such as the DAEs and EEs. However, several informants noted that the NDA is not as well connected to other climate-relevant ministries that do not receive external climate funding. International informants added that the current NDA management is very strong and supportive of AEs. An example cited is the NDA's efforts to help AEs secure no-objection letters. International informants also acknowledged that the NDA is on a learning curve for how to manage its role.

During the IRM phase, two RPSP projects focused on supporting NDA capacity. In the GCF-1 phase, one FAO-led RPSP is directly addressing NDA capacity, while an RPSP project led by the UNDP is working with the NDA to develop the country's new NAP.

The policy of the Government of Bangladesh to rotate senior ministerial personnel every three years has resulted in the loss of institutional memory in the NDA office. As one informant said, "Once someone is in a role for three years, they have to be transferred. So, all the accumulated knowledge is lost every time they are rotated." Thus, the efforts of current NDA personnel and the capacity building support under RPSP grants are on relearning what was in place in the IRM and pre-COVID, and ideally being able to build upon it.

In addition to the staff rotations, a national informant posited that, being nested in the ERD, the NDA is overstretched in its commitments relative to its staff numbers and climate knowledge. The ERD coordinates programmes from all external finance partners, not just those related to climate finance. An observed consequence is a difficulty integrating similar projects that are financed by different funders into different ministries. Thus, the informant suggested that Bangladesh would benefit from a dedicated climate programming department in which management and staff are retained and nurtured to develop perennial expertise, perhaps nested in the ERD.

The NDA is trying to engage the private sector with the GCF's Private Sector Facility (PSF). The prime minister's office has a public-private partnerships office that is a natural ally for mobilizing such linkages. However, with limited staffing, the NDA has not been able to sufficiently develop the expertise or invest sufficient time to realize private sector interest. Furthermore, Bangladesh's private sector is mainly composed of a vast number of small, informal enterprises. Thus, one key

⁵ A policy to minimize the effect of currency fluctuations on the commitment authority of the GCF was submitted for consideration by the GCF Board at its thirty-fourth meeting, in October 2022.

government informant noted that GCF standards and other legal barriers made it “a big challenge, if not impossible” to engage so many informal market actors, especially micro and small businesses. The NDA also has an NDA advisory council. However, informants note that the council has not sat for many years, so has been functionally replaced by the ERD secretariat.

The NDA’s working relationship with the GCF Secretariat has stayed the same since the IRM period. The case study found that the working relationship between the NDA and the GCF Secretariat is in working well, with no evidence that the relationship had improved or deteriorated. A government informant noted that the GCF Secretariat’s Asia-Pacific desk is very helpful – responding promptly to questions. However, it was noted that remote relationships are less useful compared to climate and development partners who have an office in country, to meet face-to-face. There is also a perception that the Secretariat does not provide enough support for the NDA’s office to learn all the GCF-related processes. An informant suggested that the Secretariat develop online video tutorials on all processes to complement written manuals. It was also suggested that the current single-year RPSF grants on offer do not provide sufficient continuity – something that could be addressed with multi-year RPSF grants in the future.

AEs engage regularly with the NDA. IAEs and DAEs were unanimous in expressing that they continue to have good working relationships with the NDA, noting that the current NDA personnel, who came in during GCF-1, are hard-working and competent at maintaining communications and supporting their progress. One IAE described how the NDA would approach them to request their collaboration on pursuing new projects. Another mentioned the impressive constancy of the NDA’s communications. However, two IAEs also mentioned that the wholesale turnover of staff in the NDA required a reset, redevelopment and reeducation of newer NDA personnel on the different types of GCF funding available, and what the NDA’s and the AEs’ distinct responsibilities are.

DAEs noted that the NDA was very supportive of their development of project applications. One noted that the NDA introduces them to GCF funding opportunities that they otherwise would not know about, and that the NDA is a key mobilizer to help them gain no-objection letters and a key conduit to GCF-related capacity-building. A DAE also stated that the NDA is useful in identifying relevant concepts in the CP and matching them to the DAEs. NDA personnel also help DAEs to develop subsequent CNs, and play an active project monitoring role, reviewing annual progress reports (APRs) and also attending project field visits.

National EEs also reported that they are well supported and well informed by the NDA and are invited to all GCF-related meetings the NDA facilitates.

2. IMPROVING ACCESS TO THE GCF

a. Access to AEs that cover country programming priorities for the GCF

Bangladesh currently does not have sufficient access to AEs that cover its programming priorities for the GCF. There are two major issues:

- A focus on a small range of sectors by current IAEs and DAEs, meaning that there are potential gaps in GCF programming for the country.
- IAEs already have full climate programming portfolios, creating a reluctance to invest the time and resources required for another GCF proposal.

With six current funded GCF projects and seven current or past RPSF projects, Bangladesh looks comparatively well served by GCF finance. However, several informants noted that the current mix of IAEs, DAEs and EEs results in only a small range of climate-affected sectors being addressed by GCF finance.

National and international informants stated that the IAEs operating in Bangladesh are already operating at full capacity with projects from various climate finance channels, so cannot bid for new GCF projects. IAE informants stated the challenge is exacerbated by the time and resources required to pursue a GCF project. One noted that if a proposal value is less than USD 150 million, then the investment of personnel and resources is not a responsible expense. Another IAE expressed that their ability to engage further in Bangladesh is hampered by the perception that the organization already has “enough” GCF projects globally.

In relation to aligning DAE nomination with country programming objectives, the study found positive signals from the IRM phase. Several international and national informants described a robust process that was undertaken to identify suitable DAEs from among government ministries and departments but that did not initially consider non-government entities. The process generated an initial shortlist of 14 government entities, which was whittled down to 6, and ultimately 2 entities succeeded in gaining accreditation. It was observed that the final determinant of success related to having highly developed audit and fiduciary systems and policies. National informants explained that most government departments in Bangladesh do not have robust fiduciary systems in place, so are not suitable candidates. Informants noted that the accreditation of the Infrastructure Development Company Limited (IDCOL) was strategic due to its reach into the private sector. It was also noted that the NDA is supportive of civil society organizations considered for DAE nomination. National informants affirmed the importance of nurturing more DAEs because international consultants generally do not stay long enough to understand the local nuanced differences in climate vulnerabilities and lack understanding of the sectoral interlinkage of climate vulnerabilities and potential context-specific solutions.

b. Meeting DAEs’ needs for capacity-building to access the GCF

In Bangladesh, national DAEs’ needs for capacity-building to access the GCF are being partially met through GCF support. Earlier RPSP grants during the IRM were instrumental in establishing two DAEs, and current RPSP grants are nurturing the pursuit of accreditation by a new crop of DAE nominees as well as expanding the capacity of existing DAEs to develop CNs and proposals. The current FAO-implemented RPSP project, in support of the NDA, is conducting consultations with existing DAEs and potential DAEs to explore their interest in and capacity for climate-smart agriculture CNs. They have also conducted a DAE gap assessment to guide DAE nominations and are also providing training on GCF compliance for potential DAEs.

One DAE noted the Secretariat’s support for their pursuit of accreditation improved substantially in GCF-1: “[The GCF Secretariat] approached us better and faster. They engaged in more direct discussions and were more efficient.” This contrasts with another candidate who stated that several years after they had submitted their application, with no interim communication, the Secretariat told them that the process had changed and they needed to redo their application.

An informant noted that for DAE nominees, more investment is required to help the candidate organizations meet the required fiduciary standards of the GCF. National informants also posited that lower-capacity entities in least developed countries would best be nurtured by incremental experience in a graduated system of accreditation (below Risk Category C). One key informant noted, “[To] support countries with lesser capacities, there should be simplified options for [aspiring DAE candidates] that do not meet the regulations of a financial institute. Have a two-year probation to prove ourselves. Then graduate ... let us pilot with smaller amounts, and graduate if we succeed to higher amounts.”

There was also a desire expressed for the GCF to allow multiple DAEs and IAEs to collaborate on single projects to facilitate greater transfer of learning between entities.

3. PROGRAMMING AND IMPLEMENTATION

a. Meeting country programming needs through GCF readiness support

Bangladesh has, in several ways, engaged with the GCF's RPSF for country readiness.

Interviews suggested that much progress is being made, but also identified capacity gaps yet to be addressed. As stated above, Bangladesh has benefited from seven RPSF grants. The current FAO-led RPSF and another by the Palli Karma-Sahayak Foundation (PKSF) are investing in the compliance capacities of DAEs and to extend government departments' awareness of how to partner up DAEs to pursue GCF programming. The FAO-led RPSF grant has also helped the NDA make its information publicly accessible by transferring it to a website and the project includes plans to support the NDA to update the CP by facilitating wide-reaching consultations with government and civil society actors and beyond.

Another RPSF project, by UNDP, is helping the country develop its NAP. An external climate actor observed that the NAP consultation process was very wide-reaching across Bangladeshi society, and a government informant also described how the lead NAP document (in draft form) is undergirded by at least 19 detailed thematic guides developed to inform the main document.

Looking further back, informants expressed how RPSF grants shaped the country's relationship with the GCF for the better. During the IRM, the UNDP matched GCF funding for its RPSF grant one to one using its own funds. The RPSF focused on raising government departments' understanding about GCF standards and processes. This RPSF grant was reported to have helped set the realistic expectations and clarify the due diligence process for the access to the GCF funding.

The ideas for RPSF grant requests are primarily being driven by the NDA, with support from international actors. The close alignment of RPSF objectives with the NDA's, DAEs' and DAE candidates' past and current developmental needs indicates that FPs have been well targeted. A key government informant pointed out that submissions to the NDA are scrutinized by a 22-member technical team that includes representatives from various climate-relevant government ministries, which helps ensure that new proposals address country priorities.

Bangladesh's needs appear to be adequately met through the GCF's and other resources.

Informants also pointed out several areas yet to be addressed, some of which are objectives of current RPSF grants. Informants identified the following areas of need, among others:

- Capacity to develop, write and evaluate CNs and proposals is still weak in Bangladesh.
- Government departments still have limited understanding about adaptation and mitigation and how they relate to their sectoral responsibilities.
- DAE candidates still need further support, such as for ESS compliance or financial standards.

The NDA engagement with international partners (such as UNDP, FAO and PricewaterhouseCoopers) and the two DAEs (especially PKSF) in developing relevant RPSF grants is evidence that **the country will likely continue to be active in developing future RPSF proposals** to address the ongoing capacity gaps cited above. One key constraint is the triennial reshuffling of all government and departmental managers, and the associated loss of institutional memory.

b. Effectiveness of processes for funding proposal origination, development and appraisal to meet country needs

Bangladesh has been **active in engaging with the GCF and has submitted numerous CNs and FPs – more than the average compared to other countries in the region.** Six of the current eight CNs were submitted by DAEs, along with a current FP and a SAP proposal (submitted during the

IRM). CNs tend to emerge from bilateral consultation between government offices and AEs, according to the strength of their existing relationships.

The current mix of GCF projects in Bangladesh was mostly informed by the country's 2018 CP, and all show significant country ownership, as noted above. Despite Bangladesh's early success in attracting six approved projects, **momentum has waned in GCF-1**, with only one new proposal being submitted in GCF-1, and no proposals originating in GCF-1 being approved so far. Only three of the current eight CNs were submitted in GCF-1.

Also, some stakeholders felt the GCF's proposal application process places too much emphasis on GCF expectations, without sufficiently weighting Government of Bangladesh perspectives on climate change impacts in the country.

Examples of top reasons for not submitting more FPs to the GCF revolve around DAEs' need to garner the expertise and funding to pursue GCF proposals, other finance partners being much easier to access, and current IAE partners expressing that they are fully committed with their current projects. For example, a DAE informant expressed that, "Compared to other development partners, GCF is more complicated. We are getting better at it after three and a half years of dealing with it. But it could be streamlined." As Bangladesh does not have a national pool of consultants who know GCF processes well, it is difficult to find support in country to pursue new proposals.

None of Bangladesh's current IAE partners have been willing to pursue a new CN or proposal. In addition, six CNs developed in the IRM period have not advanced, as the IAEs have neither the resources nor the will to pursue new proposals – in part due to the length and unpredictability of the GCF's proposal process, combined with the easier accessibility of other sources. Also requiring all Board members to approve a CN or proposal was discouraging for project proponents, with perceived divisions between Board members.

The process of developing CNs is viewed as unpredictable and has not improved during GCF-1. If a CN is still in development after two years, it needs to be redesigned because the circumstances will have evolved and changed. Other issues cited in developing CNs include a lack of clarity in the GCF handbook regarding key terms or guidance on the use of each type of funding (e.g. grants or loans), changes in policies such as "gender" and "disclosures," and the lack of availability of updated climate data. One informant said, "In our country, climate data is not available. It is always five or six years old... [Yet the] GCF keeps asking why you don't have the most updated data."

An international informant added that there is variability among and changes of direction from appraisers, the reviewers change and have differing opinions, questions are repeated over each wave of review, and reviewers may demand a level of detail not appropriate at the design stage. By contrast, another informant observed that "GEF and CIF are more streamlined. GCF have a lot of duplicating processes. The CIF process is much simpler. So much simpler, like night and day."

One of the DAEs acknowledged and praised the GCF for undertaking a process to prepare sectoral guidelines to facilitate developing adaptation and mitigation projects, which will make developing CNs and proposals more predictable. An RPSP implementer also noted discovering late in the process how helpful the GCF Secretariat is in guiding CN development – lamenting not having tapped into the Secretariat's support earlier.

Also, the NDA's office was uncomfortable with the pool of consultants the GCF provides for supporting CN development – consultants whose approach and competencies are unknown to stakeholders in Bangladesh. National stakeholders suggested that the NDA should have the opportunity to provide an opinion during consultant selection.

Bangladesh is regularly seeking PPF support for FP development. Both accredited DAEs have accessed the PPF several times. One noted that the support through the PPF for a PSF proposal was “amazing ... letting us know what is coming up and how to be prepared. Our perception of GCF changed completely.” They also expressed appreciation for the GCF consultant support for developing a climate rationale, which they were not able to do with their own capacities and information. DAEs also found the process to access the PPF easy, after the CN was finally approved.

Currently, stakeholders find the submission through appraisal process cumbersome but possible and improved over time. Gaining approval for a CN is still lengthy and difficult, but changes have made proposal requirements progressively easier to navigate.

The country stakeholders’ feedback on the process from approval to funded activity agreement (FAA) under GCF-1 is that it is slightly smoother than previous experiences. Delivery partners noted that the rigour of ESS requirements was a surprise to many country stakeholders, and it was a core challenge for national entities wanting to pursue DAE accreditation. Nevertheless, current DAEs felt that **the policy requirements have been streamlined in recent years**, making it easier to predict how to comply with ESS requirements.

Still, informants representing multiple projects noted multi-year processes to finalize FAAs are taking as long as four years.

c. Sufficiency of funded activity implementation and supervision processes

The GCF has had limited engagement with DAEs during implementation to identify and manage risks and results – specifically in relation to APR review. A DAE informant noted that there have been no changes in the way the GCF Secretariat supervises project implementation between the IRM and GCF-1 in relation to GCF Secretariat’s engagement in monitoring and risk management. An IAE informant noted that during GCF-1, formalizing clear deadlines for reporting has made reporting cycle planning easier for AEs. Another IAE observed that the GCF’s environmental and gender compliance requirements have improved EE performance and confidence. An IAE appreciated that the Secretariat is very open to their requests for assistance.

Informants also shared that GCF supervision and risk management procedures have some weaknesses. Firstly, international informants shared that **GCF reporting requirements are perceived as inefficient**: being much harder than those of other financiers, without adding quality. One noted that the high volume of indicators they must report against was difficult, and potentially impossible, for DAEs to address. Another observed that the fiduciary reporting feedback alone comes as 12 pages of very specific and detailed questions, which is far in excess of comparable finance partners. “It might take up to five times as long to do GCF reporting requirements and then the follow-up their queries.”

Several IAEs perceived that the GCF’s **APR reviewers do not seem to have sufficient time or continuity processes to perform their role adequately.** An IAE observed that, while at times a reviewer might respond to an issue in matter of days, in other occasions, it will be many weeks. Several international and national informants complained that APR reviews regularly raise questions they have previously addressed. For example, “People change in the GCF and do not read the background context and then [are] asking the same questions ... We know it will be the same problems for the [next project].”

Informants also expressed concern that APR reviewers do not have the flexibility to do their roles effectively. For example, an IAE informant noted that APR reviewers struggled to understand the unpredictable developments and delays that arise for infrastructure projects from community consultations and site assessments – interwoven with COVID-related delays – which cannot be

anticipated in a project proposal. In one case, the reviewers' questions and the AE's responses generated cyclical conversations between the reviewers and AE that took an entire year to resolve. Both international and national informants expressed that it is a gap in the GCF's supervision process that the Secretariat cannot communicate directly with EEs, and vice versa. One EE expressed that, "It is [us] who is implementing the project. We could sit with the [GCF] directly and explain things to them and tell them what we are doing."

An international informant expressed appreciation that the **GCF's gender and environmental requirements are "useful learning"** to improve EEs' implementation. Nevertheless, a key challenge noted by IAEs is that, though international entities may be comfortable with the risk management requirements of the GCF, government departments in Bangladesh that are implementing projects and responsible for carrying out and reporting on the ESS and fiduciary responsibilities have difficulties to enforce ESS by EEs because they are so different to government standard expectations and practices. Also, more capacity-building for EEs is necessary to improve their ability to fully adhere to GCF risk management standards.

National and international informants raised concerns that tying the release of the next disbursement to the completion of an interim evaluation was a significant problem for projects affected by COVID-related delays. Projects have not progressed enough to justify an evaluation. However, international informants were confident the Secretariat would be constructive in supporting a deferral.

4. PROGRESS TOWARDS RESULTS AND IMPACT OF GCF INVESTMENTS

Of Bangladesh's six approved FP and SAP projects, three have not yet disbursed. The PSF project FP150, by the DAE IDCOL, is still awaiting FAA finalization. Two World Bank projects, FP170 and FP177, had FAAs approved in 2019 and 2020 respectively but have not yet been disbursed. Therefore, the discussion below relates only to three active projects:

- FP004: Climate-Resilient Infrastructure Mainstreaming in Bangladesh – with IAE KfW Development Bank
- FP069: Enhancing adaptive capacities of coastal communities, especially women, to cope with climate change induced salinity – with IAE UNDP
- SAP008: Extended Community Climate Change Project-Flood (ECCCP-Flood) – with DAE PKSF

a. Evidence that intended outputs and outcomes have been achieved/are likely to be achieved

GCF funded activities are behind schedule to deliver expected results in Bangladesh. All three active projects report having delays due to COVID restrictions. A summary of the evidence of outcomes to date is presented in Table 9.

FP004 focuses on national standards for infrastructure, as well as the construction of emergency shelters in climate-vulnerable coastal communities. Its implementers and the IAE estimate that they have accomplished 50 per cent of the project's objectives relative to where they should currently be. However, implementers were confident that progress through 2022 will advance them to make up lost ground before the end of the year.

A key component that has progressed most strongly has been the review and revision of procedures for the Local Government Engineering Department (LGED) to ensure all future government-led infrastructure applies construction and facility management standards that are climate ready. Other components that are advanced in planning, as evidenced by site visits as well as informant

interviews, are the institutionalization of a “centre of excellence” for research and learning for climate adaptation in construction within the LGED, plus community consultations and joint planning for siting and designing community cyclone shelters in the most vulnerable coastal communities. These components will continue to progress, but construction is still some way off commencing.

FP069 is also focused on two vulnerable coastal locations and has two core components for enhancing gender-based climate resilience: climate-resilient local livelihoods for women, and safer and more secure water and sanitation. Consistent with the most recent APR (February 2022), the IAE estimates that the water and sanitation component was around 80 per cent complete at the time of this report’s data collection. The livelihoods component was around “35 to 40 per cent” complete, largely constrained by environmental safeguard requirements that community members are not yet supportive of. Like FP004, however, they expected that the project will reach 100 per cent of both objectives over the remainder of 2022.

SAP008 is helping climate-vulnerable communities to form peak climate adaptation action planning groups, called Climate Change Adaptation Groups (CCAGs). CCAGs are being supported by PKSF to develop leadership skills as well as build good relationships among the community members to facilitate decision-making for local- and household-level climate adaptation actions. The project then also supports subsequent local climate adaptation actions. The most recent APR (February 2022) indicated that community consultations, CCAG formation and project participant selection had been fully accomplished and that active household adaptation supports had begun but were only a quarter achieved. This study’s interview with DAE staff suggests that these reports were accurate and that more progress has been made since the APR was submitted. Accomplishments include raising plinths (earth mounds) to increase the height of homesteads to minimize flood ingress, and to raise vegetable gardens and household livestock dwellings (for cattle, goats, sheep and poultry); installation of raised and protected tube wells and latrines to reduce the flood vulnerability of such structures and the risk of faecal contamination of flood waters; and increased income generation and leadership capacity among climatically and economically vulnerable households.

Table 9. Summary of evidence of outcomes

OUTCOMES	EVIDENCE FROM GCF FUNDED ACTIVITIES
Reduced greenhouse gas emissions	Projects to reduce emissions have not yet commenced.
Increased resilience*	FP069 has mobilized over 25,000 women into women’s livelihood groups to increase household incomes; activated gender-responsive disaster early-warning educational materials and local volunteer educators in at-risk communities; and assisted around 11,000 households to install rainwater harvesting systems for water security. SAP008 has supported over 2,500 at-risk households to raise the height of their houses and supported over 2,000 households to install raised livestock dwellings to reduce livestock vulnerability to flood waters and disease. Furthermore, over 30 protected tube wells and over 30 flood-resistant latrines have been installed.
Enabling environment**	FP004 is midway through supporting the LGED to ensure all future government-led infrastructure is guided by procedures to ensure climate resilience, community aspirations, gender sensitivity and long-term appropriate maintenance. FP069 has developed “Adaptive (climate) Scenario Modelling” and a “Gender-based Adaptive Livelihoods Toolkit” for the Ministry of Women and Children’s Affairs, to institutionalize its approach to assisting vulnerable communities to increase their resilience to climate risks. The project has also started forming water and sanitation committees in target communities to manage water security and hygiene and the sanitation health of communities (though acknowledging that such committees are

OUTCOMES	EVIDENCE FROM GCF FUNDED ACTIVITIES
	<p>not yet functional).</p> <p>SAP008 has formed CCAGs in all 1,000 targeted communities to plan and coordinate local climate adaptation actions (acknowledging a lot more capacity-building and mobilization will be required over coming years).</p>
Co-benefits	<p>FP004 has invested much study and community consultation to ensure cyclone shelters are safe and convenient for women, including in relation to the siting and equipping of storage and cooking facilities. Cyclone shelter designs are also now ensuring disability access by including access ramps. A community site visit by this study found that the community consultation processes expressly engaged women, young people, marginalized ethnicities and especially poor people to ensure their needs were included.</p> <p>FP069 is addressing the financial independence of women, as well as the accessibility of safe and close water supplies to primarily benefit women who continue to be primarily responsible for household water supply and family health. A community site visit by this study found that the community consultation processes expressly engaged women, young people and people with a disability, targeting group by group. Decisions were made based on the information from different beneficiary groups.</p> <p>SAP008 has expanded the diversity of foods produced by participating households, which is likely to improve child and adult nutritional diversity. Similarly, better access to potable water and better latrine construction to safely dispose of faecal matter are reported by informants to already be reducing the burden of water-related illnesses in participating communities. Similar to FP069, a focus on women's leadership skills and roles is likely to improve participating women's status in the community and balance decision-making equality in their households.</p>
Other notable outcomes	None.

Source: Projects annual performance reports 2019-2020

Note: *Such as number of beneficiaries, value of physical assets, hectare of natural resource areas/land.
*Such as strengthened institutional and regulatory frameworks, technology deployment/ dissemination/ development/ transfer/ innovation, and market development/transformation at sectoral, local or national level.

The key obstacles to achieving the intended project-level outputs and outcomes are as follows.

- Not surprisingly, informants from all active projects reported that the **COVID pandemic has contributed to delays in implementation**. Most notable is that lockdowns in 2020-21 made meetings and implementation impossible at times. In addition, the pandemic resulted in projects not being able to access international consultants.
- For FP004, a project that involves a lot of material inputs, delays in disbursement also relate to a four-year legal negotiation process over the FAA between the IAE and the GCF, which has resulted in a four-year delay in procurement. Informants for two of the currently undisbursed projects also raised the **prolonged FAA negotiation process** as the cause for delay in commencing implementation.
- For FP150, which is a PSF project to assist the textile industry, even before the project has received disbursement it is encountering resistance from **textile businesses who are wary of the ESS requirement** to ensure environmentally responsible disposal of old, inefficient machinery, due to the extra financial burden it places on businesses. Similarly, FP069 has experienced delays due to an **environmental safeguard regarding the promotion of aquaculture**. Because the project sites are close to wild fish breeding zones, the IAE is revising the safeguards to ensure aquaculture seed stock is not sourced from wild areas, which has delayed activities.

- A strong enabler for climate action programming cited by an external observer is that **the country’s prime minister is very supportive and personally active in mobilizing the country for climate action**. This has trickled down to well-invested national strategies and top-down expectations on all government ministries.
- **Some positive unintended consequences associated with GCF funded activities were identified in Bangladesh**. Under FP004, new community cyclone shelters are to be situated in local schools. Consequently, selected local schools benefit from having high-quality new infrastructure for use during non-emergency times. In addition, for sustainability, such siting ensures maintenance of the facilities as part of the school’s overall facilities.
- Under SAP008, assistance to raise their homesteads on plinths, increase the quality of the homestead building and install quality latrines has helped to increase ultra-poor families’ status in their surrounding communities. Furthermore, during flooding in project locations in 2021, households that had been assisted to raise their houses reportedly sheltered their neighbours and others in the community whose houses were inundated.

Box 1. Local and national knowledge merge in Dushtha Shasthya Kendra

Shyamnagar Upazila, in Satkhira District, is surrounded by delta rivers and is vulnerable to cyclones and strong storm surges. The project Climate-Resilient Infrastructure Mainstreaming in Bangladesh (FP004) is working towards protecting people’s safety in this *upazila* by introducing community emergency shelters.

At the most local level, the LGED has conducted extensive consultations to understand, and incorporate into plans, the needs and aspirations of people who will access and use the shelters. Consultations identified and included the most vulnerable members of the affected population, including women, young people, children, people with disability, marginalized ethnicities and especially poor people, as well as local councils.

Local representatives explained to the country case study consultant that the consultation process identified local government schools as the best place to locate new shelters. These are central in the community, new shelter facilities can be used by the school during non-emergency times, and for sustainability, the shelters will be maintained as school facilities with government budget.

A local representative said, “The school students will benefit immediately from these infrastructures. And we villagers and community people will get benefits during any natural calamities like cyclones, storms and floods.”

When construction begins, it will be informed by improved cyclone shelter designs and participatory planning processes being developed by the LGED’s Climate Resilient Local Infrastructure Centre of Excellence, which is being nurtured under FP004. Between local participation and new national guidelines, plans are being developed to ensure the shelters are well sited, gender sensitive and safe, practical, long lasting and maintained for the long term.

Source: Site visit to Dhankhali Govt Primary School and Vamia Govt Primary School, Shyamnagar, Satkhira, 6 June 2022; and site visit to the LGED’s Climate Resilient Local Infrastructure Centre, 29 May 2022

b. Progress of funded activities towards paradigm shift

GCF funded activities in Bangladesh show emerging⁶ signals of paradigm shift (Table 10). For **FP004**, the focus on changing the procedures of the LGED is designed to ensure climate-resilient building design is **scaled across the entire country**. While the project will support some local-level cyclone shelter construction in specific districts, the LGED is responsible for all government

⁶ “Emerging signals” are those that suggest that paradigm-shifting processes are underway but where outcomes may only be visible yet at lower-level systems (e.g. micro/individual/communities, or demonstrations/subnational). To be an emerging signal, there must still be a clear line of sight to connecting lower- and higher-level systems (e.g. sectors, national).

construction across the entire country. The project’s investment in establishing a centre of excellence for climate resilience in construction within the LGED, plus the identification and updating of the LGED’s guidelines for the most climate-relevant construction sectors, show emerging signals that climate-resilient construction will become mainstreamed. LGED’s guidelines are used for all LGED works, as well as those by local government institutions. In addition, at the time of data collection for this study, a consultant to the project was developing a handbook and community engagement and gender tools to guide predesign consultations with communities surrounding intended infrastructure sites.

Regarding the **sustainability** of FP004, it is too early to evidence long-term sustainability. However, early indications are that the LGED is fully committed to maintaining the new Climate Resilient Local Infrastructure Centre of Excellence. In relation to cyclone shelters to be constructed under the project, the siting of shelters in schools as part of the school infrastructure supports the long-term maintenance of the shelters within government-expanded budget for those schools.

For **FP069**, the strongest signal of **scalability** is that the original intent of the project was to cover five at-risk coastal districts, but the project was scaled back to just two to moderate the proposal budget. Thus, the concept was developed to be applicable to three other yet unserved districts.

Regarding the **sustainability** of FP069, again, the project is still too early in its implementation to evidence sustainability. The project’s plan for the sustainability of new water infrastructure relies on (1) the ongoing functioning of women’s water and sanitation committees formed under the project, (2) the willingness of households using the new water points to pay fees to the committees to collect water, and (3) the Department of Public Health Engineering maintaining technical support for water-harvesting structures. To date, there is no evidence whether or not these assumptions will be realized in the long term.

For **SAP008**, regarding **scalability**, this project is a scaling of a previous project that proved effective. Thus, it is a model that the Government of Bangladesh considers appropriate for expansion throughout flood-vulnerable communities across the country.

Regarding the **sustainability** of SAP008 results, the design of the project depends on the continuity of CCAGs after the project is completed. Findings of a previous version of the project found that CCAGs continued to function if connected to financial services for members such as credit, savings and enterprise loans. Thus, the project design relies on CCAGs being connected to microcredit non-governmental organizations, as well as the household-level adaptive improvements such as raised homesteads, food gardens and animal dwellings being maintained by participants and replicated by neighbours, assuming their benefits are tangible and evident to community members. To date, this study found no evidence of credit systems being connected to the CCAGs this early in the project, and it is too early to determine if household adaptations will be maintained and replicated.

For the not-yet-commenced **FP150**, a latent signal of potential **scalability** cited by a national informant is that the demand for energy efficiency in Bangladesh “is huge” and the national textile industry is also “huge” beyond the scale that the project will be able to achieve. Thus, if the project generates the anticipated business advantages it is designed to, it may generate almost unlimited demand.

Table 10. Summary of evidence of dimensions of paradigm shift

DIMENSION	EVIDENCE FROM GCF FUNDED ACTIVITIES
Scale* and replicability**	<ul style="list-style-type: none"> FP004: Embedding new climate-resilient construction guidelines and a permanent “centre of excellence” for climate resilience into the LGED will shape all government-led construction for the foreseeable future. FP069: The project was designed to cover three other coastal districts that the

DIMENSION	EVIDENCE FROM GCF FUNDED ACTIVITIES
	<p>GCF funding has not covered.</p> <ul style="list-style-type: none"> SAP008: The project is a scaling of a past version of the “Community Climate Adaptation Group” model.
Sustainability	<p>It is too early in any project to evidence sustainability. However, some signals are emerging:</p> <ul style="list-style-type: none"> FP004: The Centre of Excellence and construction guidelines are being institutionalized into the LGED. FP069: Incorporates local management committees and a user fee to maintain water points and anticipated post-project support from the Department of Public Health Engineering.

Source: Projects annual performance reports 2019-2020

Note: *Degree to which there has been a significant increase in quantifiable results within and beyond the scope of the intervention. This could include a situation where the GCF is scaling up earlier demonstrations, or the GCF project will be scaled up outside project bounds. **Degree to which the GCF investments exported key structural elements of the proposed programme or project elsewhere within the same sector, as well as to other sectors, regions or countries.

c. Women and other vulnerable populations, including indigenous peoples

In Bangladesh, GCF funded activities under implementation include women in capacity-

building and training activities, decision-making and primary beneficiaries of outcome. As noted above, this study’s visits to communities targeted by FP004 and FP069 found that community consultations by implementers explicitly sought engagement with women, young people, marginalized ethnicities and people with disabilities to ensure the perspectives of such vulnerable groups were factored into the projects.

FP004, FP069 and SAP008 directly focus participation and benefits on women in climate-vulnerable coastal communities. In FP069 and SAP008, key benefits for women include increased income earning, leading to more balanced household decision-making influence; participation in leadership and technical training workshops leading to membership of water and sanitation committees and the subsequent elevation of community status; and reduced distances to collect water.

Under FP004, the primary near-term benefit for women will be that cyclone shelters have been redesigned to optimize women’s protection in relation to the situating of cooking facilities and secure storage within the shelters.

d. Catalysing public and private finance

FP004 has been co-financed by the Government of Germany. It has no design aspirations for attracting private finances. The Government of Bangladesh co-financed FP069, providing USD 25 million.

FP069 and SAP008, as adaptation projects, have no prospect of mobilizing private sector finance, except at the micro level of engaging microfinance to distribute livestock and other household-level productive assets, and encouraging cost recovery of water management committees by collecting fees from water users.

The not-yet-commenced FP150 is a PSF project. However, the attractiveness of its planned concessional loans is already in doubt for two key reasons. First, being pegged in US dollars, the concessional rate is negated by the depreciation of the Bangladeshi taka against the dollar over time. Second, the previously mentioned environment and gender conditions on which the loans will be contingent are potential costs and expectations that Bangladeshi businesses are reportedly unaccustomed to and wary of.

e. Knowledge management and learning efforts within GCF funded activities

GCF funded activities under implementation show some evidence of knowledge and learning efforts. Under **FP004**, the LGED, under its Climate Resilient Local Infrastructure Centre, is working on **developing a knowledge management system** to host climate-relevant data, information and best practices, and to facilitate communication. To distil initial lessons, a framework to capture best practices and lessons learned from past constructions has been developed. A long-list of LGED climate-relevant projects has been prepared, and a shortlist of potential projects will be studied to identify best practices or lessons learned. Media such as documents, videos and stories will be shared in the knowledge management system platform to be accessible by all LGED engineers and disseminated through awareness-raising training and workshops. The knowledge management system is also intended host relevant climate data and information and the Climate Resilience Tool, which LGED engineers throughout Bangladesh will be able to access and use for planning, designing, implementing, operating and monitoring local infrastructure.

Under **FP069**, the EE – the Ministry of Women’s and Children’s Affairs – is **establishing a climate change and gender “cell”** in the Ministry and has taken steps to **set up a server/access portal** with technical assistance for the IAE. The server will record lessons learned via the GCF funded project and other projects to make the knowledge sustainably accessible for future planning.

D. EMERGING LESSONS FOR THE GCF

The following emerging lessons for the GCF can be drawn from the Bangladesh case:

- While Bangladesh was quite active in the IRM period, securing a large number of RPSP grants and approved FPs, the momentum has slowed due to COVID restrictions, a reluctance among IAEs to invest in another GCF proposal in Bangladesh, and DAEs’ need to access expertise and funding in order to pursue GCF projects.
- An engaged NDA in Bangladesh has been helpful in actively pursuing RPSP grants to address capacity gaps and in supporting DAEs in identifying relevant project concepts for them to pursue and in developing CNs. The RPSP projects in GCF-1 are proving practical for updating national climate plans by facilitating national consultations to develop Bangladesh’s first NAP and second GCF CP. NDA capacity-building efforts, however, are more likely to be retained from a dedicated climate programming department or team if there is limited turnover among the NDA staff and they are not subject to rotation requirements.
- The GCF Secretariat’s process for selecting consultants may not sufficiently adhere to the GCF’s principle of country ownership, due to a lack national partner accompaniment of the process.
- GCF programming engages only a narrow range of government ministries as EEs. However, government departments that might be key to climate programming are not motivated to pursue GCF funding because of the high fiduciary and compliance standards of the Fund.
- There may be missed opportunities for enabling GCF funding to integrate with activities funded by other sources, or for proposals to incorporate multiple DAEs and IAEs. For example, such collaborations could facilitate greater transfer of learning from higher- to lower-capacity entities.
- Given their preference for in-person interactions, Bangladeshi stakeholders would appreciate video-based downloadable tutorials to learn the many GCF processes and compliance requirements, as a complement to the written manuals.

- Revisions to proposal requirements and the release of sectoral guidelines through GCF-1 have made developing CNs easier to navigate, though CN and proposal appraisal processes remain challenging for IAEs and DAEs alike.
- The GCF's ESS are appreciated by stakeholders for improving consultative design, implementation, and the expertise of EEs and DAEs, but are a particular disincentive for Bangladesh's private sector, which is not accustomed to the additional costs associated with their requirements.

Appendix 1. LIST OF INTERVIEWEES

NAME	FUNCTION	AFFILIATION
Farhat Jahan Chowdhury	Senior Project Officer	Asian Development Bank - Bangladesh
Gobinda Bar	Team Leader External Relations	Asian Development Bank - Bangladesh
Harunur Rashid, Prof.	Professor	Bangladesh Agricultural University, Department of Fisheries Management & Interdisciplinary Institute for Food Security
Shamsuddoha	CEO	Center for Participatory Research & Development (CPRD) (civil society organization)
Harun Or Rashid	Dep. Director of Environment	Department of Environment
Mahmud Hossain	Dep. Director, overseeing climate change	Department of Environment
Mirza Shawkat Ali	Director (Climate Change and International Convention)	Department of Environment, under the Ministry of Environment, Forest and Climate Change
10 participants	Various teachers, school committee and student positions	Dhankhali Government Primary School, Shyamnagar, Satkhira (under FP004)
Mahbub Alam	Second NDA focal point	Economic Relations Division, Ministry of Finance
Crispus Njeri	International climate change specialist, BGD	FAO
Ren Hui	Asia-Pacific portfolio in GCF team	FAO
Kristofer Johnson	Team leader of climate and environment group, BGD	Food and Agriculture Organization of the United Nations (FAO)
Mafruda Rahman	Assistant Vice-President	IDCOL
Tanushka Mumtahina Billah	Assisting Manager	IDCOL
M. Mosleh Uddin	Senior Vice-President & Unit Head, GCF Unit	IDCOL
Christina Bartz	Regional Programme Manager	KfW Development Bank
S.M. Mehedi Ahsan	Senior Urban Resilience Specialist	KfW Development Bank
Seven participants	Various staff functions	LGED Centre of Excellence: Climate Resilient Local Infrastructure Centre
Jasim Uddin	Project Director & Expert Engineer	LGED
Iqbal Hussain	Joint Secretary & NPDP	Ministry of Women's and Children's Affairs
Eight participants	Various government functions	Ministry of Women's and Children's Affairs, Department of Public Health Engineering, and

NAME	FUNCTION	AFFILIATION
		Dushtha Shasthya Kendra, Khulna, Bangladesh (under FP069)
K.M. Marufuzzaman	Project Coordinator, ECCCP-Flood	PKSF
Enayat Kiyoum	Finance and accounts, ECCCP-Flood	PKSF
Iftakhar Kaiser	Programme Officer, ECCCP-Flood	PKSF
Rabiuzzaman	Deputy Manager, ECCU	PKSF
Wahidul Haque	Programme Officer, ECCCP-Flood	PKSF
Ahmed Zubaer Mahbub	Sustainable finance department	Sustainable Finance Department of Bangladesh Bank (central bank)
Chowdhury Liakat Ali	Deputy Director of Sustainable Development Finance	Sustainable Finance Department of Bangladesh Bank (central bank)
K.M. Millat	Director of sustainable finance department	Sustainable Finance Department of Bangladesh Bank (central bank)
A.K.M. Mamunur Rashid	Climate Change Specialist	UNDP Bangladesh
Iftakhar Hossain	Project Coordinator, GCA Project	UNDP Bangladesh
Joynal Abedin	Safeguard Specialist, GCA Project	UNDP Bangladesh
Zinat Hasiba	Gender Specialist, GCA Project	UNDP Bangladesh
Nine participants	Various staff functions	UNDP GCA Project team, Dacope, Khulna, Bangladesh (under FP069)
Eight participants	Various teachers, school committee and student positions	Vamia Government Primary School, Shyamnagar, Satkhira (under FP004)
Jari Vayrynen	Energy Program Lead in BGD	World Bank
Martina Bosi	Senior Energy Economist, Energy Sector Management Assistance Program, Energy & Extractives	World Bank
Tanuja Bhattacharjee	Energy Specialist, Energy & Extractives	World Bank

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