



GREEN  
CLIMATE  
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Independent  
Evaluation  
Unit



# SECOND PERFORMANCE REVIEW OF THE GREEN CLIMATE FUND

## Country case study report

**Maldives**

May 2023

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GREEN CLIMATE FUND  
INDEPENDENT EVALUATION UNIT

## Second Performance Review of the Green Climate Fund

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### MALDIVES COUNTRY CASE STUDY REPORT

05/2023

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## ABBREVIATIONS

<b>AE</b>	Accredited entity
<b>APR</b>	Annual performance report
<b>CCG</b>	Country coordination group
<b>CN</b>	Concept note
<b>CP</b>	Country programme
<b>DAE</b>	Direct access entity
<b>DCP</b>	Division of Country Programming
<b>FAA</b>	Funded activity agreement
<b>FP</b>	Funding proposal
<b>GCF</b>	Green Climate Fund
<b>GDP</b>	Gross domestic product
<b>GEF</b>	Global Environment Facility
<b>GIZ</b>	Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
<b>IAE</b>	International accredited entity
<b>IEU</b>	Independent Evaluation Unit
<b>IWRM</b>	Integrated water resource management
<b>JICA</b>	Japan International Cooperation Agency
<b>LDC</b>	Least developed country
<b>MIC</b>	Middle-income country
<b>MoECCT</b>	Ministry of Environment, Climate Change and Technology
<b>NAP</b>	National adaptation plan
<b>NAPA</b>	National adaptation programme of action
<b>NDA</b>	National designated authority
<b>NDC</b>	Nationally determined contribution
<b>NoL</b>	No-objection letters
<b>PMU</b>	Project Management Unit
<b>PPF</b>	Project Preparation Facility
<b>RPSP</b>	Readiness and Preparatory Support Programme
<b>SDFC</b>	SME Development Finance Corporation
<b>SIDS</b>	Small island developing state
<b>SNC</b>	Second national communication
<b>SPR</b>	Second Performance Review
<b>UNDP</b>	United Nations Development Programme
<b>UNEP</b>	United Nations Environmental Programme
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change
<b>USD</b>	United States dollar
<b>USAID</b>	United States Agency for International Development
<b>WDC</b>	Women's Development Committee





## 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 Appendix 1), and a country mission undertaken from 22 to 26 May 2022, including site visits to the project Supporting vulnerable communities in Maldives to manage climate change-induced water shortages (FP007). The country mission team included Laura Hammett (ICF Senior Consultant), Daisuke Horikoshi (GCF IEU) and Asiyath Ibrahim (ICF National Consultant).

## B. BACKGROUND AND CONTEXT

This section presents background information for understanding the Maldives' experience with the GCF. The information covers both the broader country (Table 1) and climate finance contexts.

### 1. COUNTRY CONTEXT

*Table 1. Overview of the Maldives country context*

CATEGORY	COUNTRY
Demographics	<ul style="list-style-type: none"> <li>Total population is 374,775, with 58.5 per cent in rural areas and 41.5 per cent in urban areas (Central Intelligence Agency, 2022).</li> <li>Approximately 8.2 per cent of the Maldives' population live in poverty (Central Intelligence Agency, 2022).</li> </ul>
GCF group status	<ul style="list-style-type: none"> <li>Small island developing States (SIDS) (Green Climate Fund, 2022)</li> </ul>
Governance conditions	<ul style="list-style-type: none"> <li>As evaluated on six World Bank governance indicators (2020), the Maldives ranks above the median for Political Stability and Absence of Violence/Terrorism (59th percentile), around the median for Government Effectiveness (49th percentile), and just below the median for Control of Corruption (45th percentile) and Rule of Law (42nd percentile). The Maldives ranks the lowest for Voice and Accountability (36th percentile) and Regulatory Quality (35th percentile) (World Bank, 2022d).</li> <li>Fragile and conflict-affected state status: N/A (World Bank, 2022a).</li> <li>Governance: The Maldives is a presidential republic, with President Ibrahim "Ibu" Mohamed Solih as the Chief of State and Head of Government. The Maldives has an Islamic legal system with English common-law influences (Central Intelligence Agency, 2022).</li> </ul>
Economic and development conditions	<ul style="list-style-type: none"> <li>Development status: Upper-middle-income country (World Bank, 2022c).</li> <li>Important economic sectors: The services sector accounts for 81 per cent of total national gross domestic product (GDP); the industry sector accounts for 16 per cent of total national GDP; and the agriculture sector accounts for 3 per cent of total national GDP (Central Intelligence Agency, 2022). Tourism is the primary driver of economic growth, fiscal revenues and foreign exchange earnings (World Bank, 2022b).</li> <li>Outlook: The COVID-19 outbreak significantly impacted the tourism sector.</li> </ul>

CATEGORY	COUNTRY
	<p>However, tourism recovered due to a strong vaccination campaign, and growth has continued into 2022. As a result, real GDP is expected to grow to 7.6 per cent in 2022 and 9.9 per cent in 2023. Inflation is projected to rise to 3.5 per cent in 2022 but remain moderate in the medium term. The fiscal deficit is projected to steadily narrow in the medium term (although public debt will remain high). Despite expected recovery, the Maldives' dependence on tourism and limited sectoral diversification makes the country particularly vulnerable to external shocks, including future COVID-19 outbreaks (World Bank, 2022b).</p>
Access to finance	<ul style="list-style-type: none"> <li>• The Maldives has a public sector led development model. Since 2016, the Government of the Maldives has rapidly scaled physical and social infrastructure investments to boost construction activity, productivity growth and medium-term economic progress. These investments have also reduced poverty. However, financing these investments through external non-concessional sources and sovereign guarantees has resulted in increasing fiscal and debt vulnerabilities (World Bank, 2022b).</li> <li>• The central government debt-to-GDP ratio was 53 per cent in 2010, rose to 78 per cent in 2019 and rapidly increased to 146 per cent in 2020 (World Bank, 2022c).</li> <li>• World Bank Ease of Doing Business Index: The Maldives ranks low among developing countries, at 147 out of 190 countries (World Bank, 2021).</li> </ul>

## 2. CLIMATE CHANGE PRIORITIES, POLICIES AND INSTITUTIONS

### a. Climate vulnerability

The Maldives is highly vulnerable to natural disasters and extreme climatic events due to its delicate ecological profile, economic dependence on limited sectors, and geography of small, low-lying and dispersed islands. Climate change is exacerbating the Maldives' vulnerability to natural disasters. The Maldives' islands are regularly exposed to extreme events, including monsoonal heavy rains, storms, swells and coastal erosion (Maldives, Ministry of Environment and Energy, 2016; Maldives, Ministry of Environment, 2020).

### b. National climate change and related policies

The Maldives' climate change policies and strategies are summarized in Table 2 below. The Maldives Climate Change Policy Framework (2015) is its national climate change strategy. The Maldives has also submitted an updated nationally determined contribution (NDC) and national adaptation programme of action (NAPA) to the United Nations Framework Convention on Climate Change (UNFCCC). These policies identify the following climate-related priorities for the Maldives:

- Enhancing adaptation and building climate resilience, while also realizing the government's visions towards a "Blue Economy". The Blue Economy promotes sustainable economic growth, safeguarding oceans, phasing out single-use plastic, and protecting and preserving the environment (Maldives, Ministry of Environment, 2020).
- Promoting a coordinated governance approach; building and strengthening existing policies, plans, and institutional structures; and incorporating them into every sector's development and implementation plans (Maldives, Ministry of Environment and Energy, 2015).
- Reducing greenhouse gas emissions by 26 per cent by 2030, primarily through increasing the share of renewable energy in the energy mix. The Maldives also strives to achieve net zero

emissions by 2030, but this goal is contingent on international support and assistance (Maldives, Ministry of Environment, 2020).

**Table 2. Maldives national climate change policies and strategies**

STRATEGY	STATUS	BRIEF DESCRIPTION
National climate change policy	Enacted	The Maldives Climate Change Policy Framework (2015), developed by the Climate Change Department at the then-Ministry of Environment and Energy, is based on five policy goals developed through an extensive consultative process with stakeholders across sectors and at the community level. The goals focus on (i) sustainable financing, (ii) low-emission development, (iii) adaptation and opportunities, (iv) capacity-building and leading advocacy at climate negotiations, and (v) fostering sustainable development (Maldives, Ministry of Environment and Energy, 2015).
Updated NDC (2020)	Submitted	The Maldives' NDC presents mitigation and adaptation targets to 2030, with the goal of achieving net zero by 2030. Actions to achieve NDC targets include increasing electricity production by renewable energy, increasing supply- and demand-side efficiency, installing waste-to-energy capacity, establishing a vehicles/vessels emissions standard and transport management system, and increasing the use of liquified natural gas to replace diesel (Maldives, Ministry of Environment, 2020).
National adaptation plan (NAP)	Not developed	The Maldives does not have a NAP, although a 2007 NAPA identifies adaptation needs for eight priority sectors, including critical infrastructure, tourism, human health, and agriculture and food security. The priority adaptation measure – identified by community, government and private sector stakeholders – is building the capacity for coastal protection, coastal zone management and flood control (Maldives, Ministry of Environment, Energy and Water, 2007).  The Maldives is currently seeking NAP readiness support from the GCF to advance its NAP process.
Adaptation communication	Not developed	The Maldives does not have an adaptation communication.
Long-term strategy	Not developed	The Maldives does not have a long-term strategy.

### c. Institutional roles and responsibilities for climate change

The Ministry of Environment, Climate Change and Technology (MoECCT) is responsible for the climate change portfolio in the Maldives (Maldives, Ministry of Environment, 2020). The Climate Change Department of the MoECCT is the focal point for the UNFCCC and collaborates regularly with other ministries and departments on climate change matters. The Climate Change Department submitted the second national communication (SNC) to the UNFCCC with support from two teams: Inventory Mitigation and Vulnerability Adaptation. The Inventory Mitigation team includes the Transport Authority, Maldives Energy Authority, public utilities and airports. The Vulnerability Adaptation team consists of government institutions – including the Ministry of Tourism, Ministry of Fisheries and Agriculture, Environmental Protection Agency Maldives Meteorological Services and– Maldives National University – the private sector and civil society organizations. For climate change projects, a project steering committee facilitates coordination between the relevant government ministries, non-governmental organizations and the private sector (Maldives, Ministry of Environment and Energy, 2016).

The Climate Change Department convenes a country coordination group (CCG), established in 2020, that provides high-level coordination of the GCF pipeline. This group has nine members: the

Minister of Environment, representatives from the Energy Department and the Environmental Management and Conservation Department within the MoECCT, an independent expert, and representatives from the Planning Ministry, Economic Development Ministry, President's Office, Ministry of Finance and Ministry of Tourism. The CCG does not engage in day-to-day project operations but rather evaluates requests for no-objection letters (NoLs) and acts as a high-level coordination body for GCF-financed projects and those in the pipeline.

The Maldives' SNC identifies key constraints, gaps and related financial, technical and capacity needs. Gaps include lack of data availability and poor data quality; lack of adaptation- and mitigation-focused technologies and financial resources to integrate those technologies; and a need to enhance the capacity of individuals and institutions implementing climate development programmes. The SNC highlights the need for financial incentives and other mechanisms to promote the accessibility and affordability of new technologies. The SNC also identifies the importance of increasing the role of existing financial institutions to provide affordable financing options (Maldives, Ministry of Environment and Energy, 2016).

### 3. CLIMATE FINANCE CONTEXT

#### a. Support for readiness

The ND-GAIN Country Index summarizes a country's vulnerability to climate change and its readiness for climate finance. The index's readiness score "measures a country's ability to leverage investments and convert them to adaptation actions" (University of Notre Dame, 2022). In 2019, the Maldives had an ND-GAIN readiness score of 0.434, making it the 101st most ready country for utilizing climate finance.

From 2010 to 2013, the World Bank together with the European Union established a Maldives Climate Change Trust Fund. The Government of the Maldives used this to implement priority climate investments and strengthen their knowledge and leadership to deal with climate change issues (World Bank, 2010). In addition, the Maldives has been a member of the NDC Partnership since 2016 (NDC Partnership, 2021).

In 2017, a GCF Readiness and Preparatory Support Programme (RPSP) grant funded the project NDA Strengthening and Country Programming Support, implemented via delivery partner the United Nations Environmental Programme (UNEP) (Green Climate Fund, 2017). This grant support strengthened capacity for the NDA and facilitated the development of the Maldives' GCF country programme (CP) in 2020.

In recent years, the Maldives has been proactive in building capacity and climate finance readiness in country while providing instrumental support for climate action in other island nations. The Maldivian President, Ibrahim Mohamed Solih, launched the Climate Smart Resilient Island Initiative at the United Nations Climate Action Summit in 2019. This effort focuses on supporting the Maldives and other SIDS to build capacity, access climate finance and achieve environment-related targets across 11 key areas, including climate-resilient infrastructure and transitioning to renewable energy (Maldives, the President's Office, 2019). Under a framework agreement with the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) as delivery partner, GCF RPSP funding was approved in 2022 to operationalize the Climate Smart Resilient Island Initiative in the Maldives and with other SIDS.

The United States Agency for International Development (USAID) launched a USD 10.5 million, 5-year, adaptation support project in the Maldives in March 2022. This effort includes specific support to the private sector, communities and government to build capacity to accelerate climate action (U.S. Agency for International Development, 2022).

## b. Climate investment

From 2016 to 2019, development finance to the Maldives that targeted climate change totalled USD 80.1 million (Stockholm Environment Institute, 2022).

**Adaptation.** Development finance commitments to the Maldives targeting climate adaptation totalled USD 28.4 million from 2016 to 2019. A recent Adaptation Fund project includes increasing climate resilience through an integrated water resource management (IWRM) programme on Ihavandhoo, Mahibadhoo and Gadhdhoo islands (Stockholm Environment Institute, 2022). This project was implemented by the United Nations Development Programme (UNDP) and was executed by the Maldives Ministry of Environment and Energy (Adaptation Fund, 2019). Table 3 lists the top donors, sectors and instruments for funding adaptation projects in the Maldives.

**Table 3. Top development partners, sectors and instruments for adaptation investments in the Maldives (2016–2019)**

TOP DEVELOPMENT PARTNERS		TOP SECTORS		TOP INSTRUMENTS	
Name	USD (M)	Name	Share (%)	Name	Share (%)
World Bank	26.4	Agriculture, forestry, fishing	54.6	Multilateral development bank loans	75.4
Asian Development Bank	1.94	Disaster prevention & preparedness	17.7	Multilateral development bank grants	24.5
Japan	0.010	Water supply & sanitation	10.2	Other development assistance grants	< 0.001

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

**Mitigation.** Development finance commitments to the Maldives targeting climate mitigation from 2016 to 2019 totalled USD 51.7 million. Recent climate fund projects include supporting the shift to electric mobility (via the Global Environment Facility (GEF)); capacity strengthening for improved transparency of climate change mitigation and adaptation actions (GEF); supporting integrated, sustainable and low emissions transport (GEF); accelerating sustainable private investments in renewable energy (via the Climate Investment Funds); preparing outer islands for sustainable energy development (Climate Investment Funds); and building the capacity of the Maldives Energy Authority (Climate Investment Funds) (Stockholm Environment Institute, 2022). Table 4 provides an overview of the top development partners, sectors and instruments for mitigation in the Maldives in recent years.

**Table 4. Top development partners, sectors and instruments for mitigation investments in the Maldives (2016–2019)**

TOP DEVELOPMENT PARTNERS		TOP SECTORS		TOP INSTRUMENTS	
Name	USD (M)	Name	Share (%)	Name	Share (%)
European Investment Bank	36.7	Energy	87.9	Multilateral development bank loans	77.4
European Union institutions (excluding the European Investment Bank)	5.7	Water supply & sanitation	3.8	Other development assistance grants	18.2
World Bank	4.6	General environmental protection	3.3	Multilateral development bank grants	4.4
GEF	3.8	Disaster prevention & preparedness	2.5		
Asian Development Bank	.93	Transport & storage	1		

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

### c. GCF portfolio

**National designated authority (NDA).** The NDA in the Maldives is in the MoECCT.

**Accredited entities (AEs).** The Maldives currently does not have access to any national or regional direct access entities (DAEs); however, it does have access to international accredited entities (IAEs) – including UNDP and the Japan International Cooperation Agency (JICA).

**Readiness and project preparation.** The Maldives has received more readiness support from the GCF than other SIDS on average.<sup>1</sup> The Maldives has received two RPSP grants, approved (see Table 5) for a total of USD 1.1 million, of which USD 0.3 million has been disbursed. There are currently two more GCF readiness projects in the pipeline, including one NAP readiness proposal. The Maldives developed a GCF CP in 2020. The Maldives has not received any support from the Project Preparation Facility (PPF).

**Table 5. RPSP funded activity portfolio**

RPSP GRANT NAME	DELIVERY PARTNER	APPROVAL DATE	OUTCOME AREAS
Maldives – Establishing and Strengthening National designated authority (NDA), and Developing Strategic Framework for Engagement with the GCF in the Maldives	UNEP	13 June 2017	NDA strengthening, including country programming
Maldives – Readiness and preparatory support to operationalize the Climate Smart Resilient Island Initiative across Small Island Developing States	GIZ	1 January 2022	-

Source: IEU DataLab, June 2022

<sup>1</sup> On average, SIDS have received USD 0.6 million in GCF readiness financing. Source: IEU DataLab, RPSP grants approved for 2015 to 2022.



**Funding proposals (FPs).** The Maldives has received more GCF financing than other SIDS countries on average.<sup>2</sup> Two projects – both national – have been approved for the Maldives (see Table 6) for a total of USD 48.7 million in GCF financing.

Currently two projects are operating in the Maldives: Supporting vulnerable communities in Maldives to manage climate change-induced water shortages (FP007) and Building Climate Resilient Safer Islands in the Maldives (FP165).

The Maldives has one concept note (CN) and one FP in the pipeline. The CN is for a national level project and the FP is for a multi-country effort.

The multi-country project Climate Investor Two (FP190), which includes the Maldives as one of 19 beneficiary countries, was approved on 20 July 2022 at the thirty-third meeting of the Board of the GCF. However, it has not been included as an approved project for this case study.

**Table 6. Funded activity portfolio**

FP	NAME	SINGLE/ MULTI- COUNTRY	PUBLIC/ PRIVATE	FOCUS	AE	APPROVAL DATE/ STATUS
FP007	Supporting vulnerable communities in Maldives to manage climate change-induced water shortages	S	Public	Adaptation	UNDP	5 November 2015, under implementation
FP165	Building Climate Resilient Safer Islands in the Maldives	S	Public	Adaptation	JICA	1 July 2021, approved

Source: IEU DataLab, June 2022

## 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 substantially linked to broader climate strategy and finance processes in the Maldives.** With support from GCF RPSP grant funding, the Maldives developed a CP through a consultative process in 2019–2020. This first GCF CP was finalized in March 2020 and links programming priorities with NDC targets and key climate change vulnerabilities and policy goals as outlined in the Maldives Climate Change Policy Framework of 2015. The CP includes mention of currently active FPs in country. For example, the Supporting vulnerable communities in Maldives to manage climate change-induced water shortages project (FP007) had already been approved and was mentioned in the CP. Likewise, the Building Climate Resilient Safer

<sup>2</sup> On average, SIDS have received USD 39.3 million in GCF financing. Source: IEU DataLab, finance by results area for 2015 to 2022.

Islands in the Maldives project (FP165) was detailed as a pipeline project (and has since been approved).

In addition to developing the CP, the Maldives updated its NDC in 2020. The updated NDC mentions the need for international support to meet ambitious climate goals, including a 26 per cent reduction in emissions by 2030. It also details plans to enhance national funding mechanisms to advance resilience and low-emission development programmes. These goals set the foundation for the CP, and the NDC and SNC were key inputs into CP development.

The CP provides an overall climate finance strategy for the Maldives and identifies the entire landscape of past donor and publicly financed climate change action in the Maldives up to 2019, including domestic funds that are available for climate finance. The identification of proposed project concepts lists only the GCF as a proposed source of finance and does not seek to link with other potential sources of climate finance.

The NDA is the core focal point for all climate finance efforts in the country, as detailed in the Maldives' NDC Implementation Plan of 2018. Stakeholders noted that the NDA, as an entity under the MoECCT, is not well integrated into the existing public sector investment planning process that manages other bilateral and multilateral donor financed efforts, which can create inefficiencies in developing and implementing climate projects. In addition, due to the high volume of adaptation finance in the Maldives, there is a degree of overlap with adaptation and resilience efforts led by the National Disaster Management Committee. These efforts are not fully coordinated with climate finance strategy or integrated into the GCF CP.

Although the CP was developed through a consultative process, stakeholders from other ministries and outside of the government did note that there was limited awareness of the decision-making process that went into CP development.

**The GCF Secretariat has played primarily a reactive yet helpful role in the Maldives with respect to the upstream programming process and aligning GCF partners and programmes with national and/or country strategy objectives.** MoECCT representatives noted that they have a positive and productive relationship with the GCF Secretariat. The Secretariat, via the Division of Country Programming (DCP), has been responsive to requests for support from the NDA and has been engaged during consultations, project processes and structured dialogues. The DCP has been collaborative during the NDA readiness process and development of the CP, though support for the CP was indirect and in the form of sharing comments and review after the document was developed. Additional ad hoc support mentioned during consultations includes the GCF's providing advice to the NDA regarding their management of various AE requests for NoLs and also fielding questions regarding the DAE application process. For example, in May 2022 the NDA team reached out to the GCF DCP for advice on how to work with AEs to manage NoLs and received prompt advice. In addition, the GCF DCP was helpful in guiding the NDA and FP007 PMU through the no-cost extension process in the wake of the COVID-19 pandemic. Stakeholders noted that the GCF Secretariat has also been active in supporting IAEs with project development processes on an ad hoc basis (see further discussion under section 3.b below).

Interviewees noted that the Maldives NDA team, despite being a small unit, is accessible and very easy to contact and that they readily reach out to the Secretariat when needed. For example, the Maldives' NDA has taken the initiative to directly discuss project ideas and share CNs with the GCF Secretariat. In the case of the project Toward Risk-Aware and Climate-Resilient communities (TRACT) – Strengthening Climate Services and Impact-Based Multi-Hazard Early Warning in Maldives (currently in the pipeline), the NDA developed a CN and submitted it directly to the GCF prior to engaging UNEP as AE. However, stakeholders also noted that GCF Secretariat engagement in the Maldives appears to be primarily initiated at the request of the NDA.



**The Maldives' GCF portfolio shows some evidence of complementarity with other climate finance channels.** The GCF CP in the Maldives details all donor-funded climate change projects up to 2019. However, direct linkages between other funds and the GCF portfolio projects are not noted. On an individual project level, however, there is some evidence of complementarity between GCF-funded efforts and other climate finance channels.

For example, the Supporting vulnerable communities in Maldives to manage climate change-induced water shortages project (FP007) was designed to build on baseline investments in water resources management and climate resilience funded by the Government of the Maldives, the Adaptation Fund and USAID. Interventions were developed to improve upon and scale up IWRM approaches tested during the Adaptation Fund investment in other atolls and further replicated as part of the USAID investments. The Adaptation Fund's Increasing climate resilience through Integrated Water Resource Management Programme was implemented with UNDP as the AE – enabling ease of complementarity in the design and development of FP007, also implemented with support of UNDP as AE.

Currently, USAID's Climate Change Adaptation Activity in the Maldives, launched in 2021, is providing support to further private sector capacity to access the GCF via assisting the SME Development Finance Corporation (SDFC) with their DAE accreditation process, complementing GCF RPSP investments.

Despite these examples of emerging complementarity of the GCF portfolio, there are also disconnects between the MoECCT and the remaining development planning in the Maldives. One example of this lack of coherence is the fact that while coastal protection activities are planned under FP165, a port development project is ongoing on the same island at the same time as project activities but without close coordination. This port development is anticipated to pose a challenge for the GCF FP in meeting its intended outcomes.

## **b. Perceived comparative advantage of the GCF in country**

**Compared to other climate finance channels, stakeholders in the Maldives report that the comparative advantages of the GCF are the direct access opportunities, the size and accessibility of funding opportunities available, and the availability of readiness finance.**

According to government entities in the Maldives, the comparative advantage of the GCF as a climate finance opportunity is linked to its size and the accessibility of funding available. The Maldives is on the front lines of experiencing daily impacts of climate change and needs significant investment to adapt; according to interviewees, approximately USD 8.8 billion (four times the national annual budget) would be required for the country to address coastal adaptation alone. However, as a middle-income country (MIC), the Maldives is also facing limitations in its ability to access concessional or grant climate finance via other multilateral and bilateral funds. For example, allocations under the GEF's System for Transparent Allocation of Resources are limited for MICs. The GCF affords an opportunity for the Maldives to not only access climate finance but access it at a scale that is able to effect transformational adaptation and mitigation action across the many atolls.

**In the case of FP165, GCF finance was also transformative in unlocking further co-finance and technical support.** JICA was able to leverage the GCF financing to mobilize Japanese official development assistance at scale to enable further investment in wave and sea level monitoring and early warning system infrastructure. The large scale of the GCF financing enabled past smaller investments to be integrated into a large programme and expand JICA's presence in and support for the country.

In addition, both readiness delivery partners and MoECCT stakeholders noted that the GCF's country-driven approach and the country ownership prioritized by the Fund are advantages. This is

demonstrated via the process of requiring a NoL, as well as by the prioritization of DAEs, which were especially emphasized as value added for the Maldives. Both the MoECCT and the government-funded SDFC are pursuing DAE accreditation.

A third advantage of the GCF noted by government entities is the availability of readiness finance and support. The NDA benefited from the initial round of NDA support through the RPSP and developed the CP. It is in the process of working with UNEP and the Islamic Development Bank to apply for further readiness funds to develop a NAP and to continue capacity-building activities, respectively. In addition, stakeholders mentioned that discussion is ongoing with the GCF Secretariat as to whether the Maldives will use RPSP funds to expand the NDA office and hire a long-term consultant to help enable further capacity for the office to manage the GCF pipeline.

**The areas where the GCF is perceived as less well positioned in the Maldives are related to the time, level of detailed data and expense needed to develop successful GCF proposals; the need to work with an IAE partner; and the perception that the GCF prioritizes projects with demonstrable return on investment and private sector involvement.**

Stakeholders from across the government and AE landscape working in the Maldives experienced challenges associated with developing successful GCF proposals – for both full-sized and readiness projects. In the Maldives, the experience of accessing the GCF has changed markedly during GCF-1, as noted in the difference between the country's experiences with the proposal process for FP007 and FP165. While the proposal development, review and approval for FP007 were described as relatively streamlined, stakeholders in the government and from the supporting AE noted that the process for FP165 – approved during GCF-1 – has been much more demanding and taken more time than expected (around five years in total from ideation to approval). The challenges in terms of the expense, time and data required to access GCF funds for FPs are further described in section 3.b below.

The time frame associated with approval was also noted as a challenge for RPSP grant project proposals. To build on the momentum established via the CP process, in 2020 the NDA initiated a NAP readiness proposal, with UNEP as delivery partner. This proposal is still pending GCF approval almost two years later. Challenges associated with accessing RPSP grants are detailed in section 3.a below.

In addition to the hurdles faced in developing successful proposals, government representatives noted that the need to work with an IAE is not always preferable due to the perceived extraneous layer of oversight and coordination necessary between IAEs, the GCF and the country. This is partially because the Maldives does not yet have a DAE accredited. Despite the existence of the CP, IAEs will approach the NDA to propose project ideas and/or request NoLs for projects that are in line with their own, rather than the country's, programming priorities. The multi-stakeholder GCF CCG, convened by the NDA, now has a standard operating procedure to review all NoL requests and holds the national mandate for NoL approval. This process helps ensure that relevant ministries are consulted during consideration of all NoLs. In addition to the NoL process, MoECCT stakeholders noted that during project implementation the need to work with an AE means that they have less transparency on processes such as annual performance report (APR) comments and responses at the country level. Further, the project management team feel they lack the ability to discuss and resolve challenges related to the project directly with the GCF, given the additional layer of IAE oversight and the need for some IAEs to coordinate communications with the GCF across their portfolio. This is seen to create unnecessary delays in communications that can hold up implementation processes.

MoECCT stakeholders at the NDA and project level all mentioned that – compared to other donors – GCF projects are relatively inflexible to change once approved, particularly in the timeline and

other factors as set forth in the FAA. Given the time needed for project start-up and the significant time between project concept and proposal development and approval, often the baseline situation may have shifted by the time the project begins. Yet, the project cannot easily be adjusted given some of the challenges associated with IAE coordination and GCF policies, as described above and further detailed below.

In recent years, stakeholders noted that the GCF has appeared to position itself to be a fund that prioritizes projects that (i) have a demonstrable return on capital investment, (ii) include significant private sector involvement, (iii) have a high level of co-finance, and (iv) enable widespread replication and scalability. The perception that the GCF has this kind of approach and emphasis on private sector involvement, co-finance and return on investment was noted as being difficult for countries such as the Maldives. While the Maldives is a MIC, the capacity development needs of the public and private sectors remain significant and public co-finance is scarce. Private entities – particularly in the tourism sector – are a large contributor to the country's GDP; however, many of these entities are foreign firms. Several stakeholders mentioned that the GCF's preference for return on investment discredits the experience of SIDS such as the Maldives, where grant finance opportunities that develop the capacities of the public sector can be transformative and stimulate further private sector development.

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

**Stakeholders agreed that NDA staffing and technical capacity in the Maldives has improved since the initial resource mobilization period; overall capacity is strong but remains limited by resource and staffing constraints.** MoECCT, as the GCF NDA, has played the lead role in mobilizing climate finance for the Maldives and coordinating with the GCF. The GCF deployed RPSP support to develop the capacity of the NDA team and develop the first CP. This tranche of RPSP support and associated activities finished in 2020. Since that time, the NDA has continued to develop its skills and capacities, hiring a new team member in 2021 and setting up the inter-ministerial CCG to help guide GCF processes in country and engage other ministries in the GCF process. The GCF DCP and IAE partners all mentioned good relationships with the NDA team in the Maldives, citing their high degree of motivation and proactive nature. In addition, the Maldives NDA team is a regular contributor and presenter at international and regional climate events, including those hosted by the UNFCCC, and has been a leader in advocating for climate action in SIDS and mobilizing GCF finance to build capacity across island nations (via the Climate Smart Resilient Island Initiative).

However, many stakeholders also mentioned the limitations of the NDA office and the perception that its role and presence in the broader development context in the country appear to be limited. The Maldives, as a small country, has a small team at the helm in the Climate Change Department of the MoECCT. The NDA staffing capacity is limited, and staff members are extremely busy given the various demands on their time and the need for robust coordination. Stakeholders noted that this has resulted in delays sometimes, including delays in being able to set up a PMU quickly after project approval. Within the Government of the Maldives, there is a perception that this limited capacity means that consultation and coordination between the NDA and other ministries related to GCF programming is not as robust as it could be. This disconnect between the MoECCT and the remaining development planning in the Maldives has affected GCF programming. For example, although coastal protection activities are planned under FP165, a port development project is ongoing on the same island at the same time as project activities, causing soil erosion and creating adverse effects that will counteract the intended benefits of the GCF project.

**The NDA's working relationship with the Secretariat has improved in some areas and become more difficult in relation to programming and country access to the GCF since the initial resource mobilization period.** Sources mentioned that the recent development of sector guidance and other programming resources has been helpful in guiding the NDA's work with the GCF Secretariat. In addition, the GCF Secretariat's DCP team has been increasingly responsive in relation to ad hoc requests for support from the NDA, such as requests related to NoLs and advice on procedures for project closure for FP007. In addition, the GCF Secretariat has been proactive in trying to help the Maldives to expand NDA capacity, and it initiated discussion of options with the NDA to utilize RPSP funds to hire a long-term consultant. MoECCT representatives welcomed this possibility but mentioned that this has not yet been feasible given the delays experienced in RPSP proposal approval (as described under section 3.a), and also that this would take away from the Maldives' ability to utilize its readiness allocation for other priority activities.

However, several sources mentioned that the working relationship with the GCF Secretariat related to project development and accessing the GCF has become more challenging in recent years. Stakeholders cited numerous examples of contradictory comments and review sheets, unclear advice and guidance, and unnecessary delays in project approval processes.

**IAEs with a physical presence in the Maldives or with active GCF projects in the portfolio engage regularly with the NDA. With few exceptions, IAEs without in-country presence or with only multi-country projects only engage occasionally, often just to obtain the NoL.** Only a few IAEs have in-country presence in the Maldives. Currently, the two full-sized projects FP007 and FP165 are implemented in partnership with IAEs that have local offices (UNDP and JICA) and benefit from the ability to directly connect with the NDA in country. In the case of JICA, stakeholders noted that the regular engagement as part of the GCF project process has enabled the IAE to further hone its climate change programme in the Maldives, together with the NDA, and to scale efforts to enable a transformational approach.

Stakeholders from other IAEs that work regularly with the NDA and that do not have in-country presence noted that the NDA is usually the one initiating the outreach to them regarding project ideas and GCF pipeline opportunities, rather than the other way around. Lack of in-country presence was noted as a challenge but not an insurmountable one for those RPSP projects that are under way or under development with IAEs without a local office. The NDA is accustomed to remote collaboration and noted that it is regularly engaging with IAEs such as UNEP, who do not have an in-country office. However, while IAEs noted the NDA as being proactive in reaching out with project ideas, it was also noted that the NDA receives regular requests for NoLs from out-of-country IAEs that appear not to have been informed by local context and NDA consultation.

## 2. IMPROVING ACCESS TO THE GCF

### **Access to AEs that cover country programming priorities for the GCF**

**The Maldives currently has access to AEs that adequately cover its programming priorities for the GCF. The major gaps are the lack of DAEs, limited access to private sector and non-grant finance, and the lack of physical in-country presence of many AEs.** To date, the Maldives has identified and been able to work with AEs that meet its needs for country programming.

Nonetheless, especially given the lack of in-country presence for most IAEs, the country is looking forward to the accreditation of DAEs to enable a nimbler and country-driven approach to accessing the GCF. However, stakeholders noted that the process of identifying DAE candidates was ad hoc and driven by interest from the institutions themselves. Sector or financial instrument needs have not been mapped against the pipeline projects in the CP or a broad assessment of potential DAE organizations.

At present, the Maldives does not appear to have robustly engaged the private sector in GCF processes. Stakeholders noted that there could be opportunities to work with the tourism sector, in particular, moving forward, which may be enabled by an AE that can leverage alternative financing mechanisms beyond grant awards.

### 3. PROGRAMMING AND IMPLEMENTATION

#### a. Meeting country programming needs through GCF readiness support

**The Maldives has engaged in several ways with the GCF's RPSP and has sought PPF support for FP development. However, country needs are only partially met via GCF resources, and current access to RPSP support is delayed/on hold.** RPSP grant support in the Maldives is helping the country meet its programming needs and advance capacity to access climate finance, but it is generally perceived as difficult to access.

As detailed above, the Maldives received NDA readiness support in the form of an RPSP grant that helped build NDA capacity and develop the CP. The project closed in 2020. This process was successful in helping the country coalesce its plans for GCF programming. With the aim of capitalizing on this momentum, a follow-on NAP readiness proposal was developed and submitted in 2020, with activities designed to take forward the CP and develop a NAP. However, this project proposal is not yet endorsed or approved and remains in the process of review by the GCF Secretariat.

Despite challenges in accessing RPSP grants (see further description below), the Maldives is also pursuing follow-on NDA readiness and country coordination and access support with the Islamic Development Bank via a GCF RPSP grant proposal submitted in 2021. PPF support is being sought for the TRACT project that is in the CN stage, but this effort has also experienced extended comment and review processes, and PPF support is still not confirmed.

The Maldives has had a somewhat more streamlined experience accessing readiness support for multi-country efforts. Readiness support has been approved for operationalizing the Climate Smart Resilient Island Initiative, a multi-country initiative spearheaded by the Maldives, with GIZ as delivery partner. This readiness support will help to develop a workplan and governance structure as well as help the member countries to access climate finance. The inception meeting for this effort was held in June 2022. It is not clear at this early stage of the project how much of the support will be realized for the Maldives and its country priorities and needs specifically.

Table 5 above details those RPSP activities that have been approved in the Maldives.

**The ideas for RPSP grant requests are primarily being driven by the NDA. The Maldives' needs appear to be met adequately through GCF or other resources available to the country.**

Although RPSP grants are seen as very challenging to access, the GCF RPSP support that has been implemented to date has helped to meet the needs of the country, as detailed above. The NDA is clear on readiness needs and has been proactive in seeking IAE and delivery partner support to pursue additional RPSP grants. These will be used to develop a NAP and continue to develop capacities in country, despite the fact that RPSP support is seen as indefinitely held up in GCF review processes. Other resources available to the Maldives to build readiness include support from bilateral agencies, including USAID, which is just beginning an adaptation project that includes capacity-building and will support DAE accreditation processes. However, gaps in readiness needs remain, and the momentum generated from the CP development process has stalled as the NAP process remains delayed due to pending RPSP support.

**Examples of top reasons for not engaging with the GCF further on readiness efforts include a lack of clear expectations for RPSP proposals and a lack of understanding of readiness options**



**or clear communication channels with the GCF for non-NDA entities.** Interviewees perceived that the GCF requirements for RPSP grants have become non-transparent and unpredictable, and that – as a result of the ensuing delays in approval – readiness support has become almost impossible to access for the Maldives. Stakeholders mentioned the lack of clear expectations for RPSP proposals, citing many rounds of GCF comments that are often contradictory or unclear and that take a long time to resolve. For the NAP readiness grant proposal supported by UNEP, five rounds of comments have been received since the initial submission in 2020. In some cases, comment responses have been with the GCF Secretariat for over three months without response. Stakeholders mentioned they would benefit from more consolidated reviews from the Secretariat and clear timelines and expectations for approval.

In the experience of stakeholders working on RPSP access in the Maldives, RPSP grants are also perceived to be being held up by the inclusion of corporate issues related to the implementing partner in the country proposal review sheets. For example, issues related to fee or implementing arrangements must be addressed in the comment response, but these require discussion at the corporate level within the AE/delivery partner. This creates unnecessary delays in RPSP grant approval. In particular for NAP readiness grants, the process and templates are perceived to be very streamlined and projects across different countries have similar structures. However, it is not clear to the stakeholders in the Maldives case why it still takes over two years to secure NAP readiness grant approval.

Contradictory comments that require back and forth with the GCF are also seen at the closure of RPSP projects. For example, stakeholders noted that the comment sheet on the closure report of the readiness project that closed in 2020 mentioned that the MoECCT was not an approved implementing partner, after it had already been engaged in implementation for 1.5 years. This inconsistency is perceived to demonstrate a lack of understanding of the project on the behalf of the GCF and creates a lack of trust in the RPSP process.

Outside of the NDA, other entities – including DAE candidates – mentioned that they have not engaged with the GCF directly or worked with the NDA to access GCF readiness support because it is not clear how they would communicate with the GCF or what readiness support would be available. Readiness support to DAE accreditation processes is being provided at present by USAID.

## **b. Effectiveness of processes for FP origination, development and appraisal to meet country needs**

**The Maldives has one country-level CN in the pipeline and is participating in one multi-country proposal process for which an FP has already been submitted. This is on par with the country's level of NDA capacity and readiness.** While the country has high technical capacity at the NDA and a high degree of enthusiasm, limits to NDA staff time mean that the coordination needed for project development is a limiting factor. Despite NDA limitations, current pipeline projects have a high degree of country ownership and engagement from a wide range of ministries. Although the Maldives has two FPs in process and a country CN in the pipeline, country stakeholders cited a need for additional investment in climate action – particularly for adaptation – and the desire to access additional GCF resources.

**Examples of top reasons for not submitting more FPs to the GCF include a lack of DAE accreditation, limited in-country expertise and a lack of country capacity to develop FPs, AE challenges with managing the GCF portfolio, and the increasing difficulty of meeting GCF requirements for approval.**

**The process of submitting CNs and FPs is perceived by all stakeholders consulted to be more difficult under GCF-1 than it has been in the past.** In the Maldives, the difficulty of meeting GCF

requirements for project approval – including the data needed for the climate rationale – is one reason that further projects have not been developed. Simplified measures – such as the simplified approval process – that the GCF has launched to create efficiencies for the approval process are not seen as being any simpler than the FP process and are not being considered by the country as viable alternatives.

Several stakeholders mentioned the desire to have DAE accreditation move forward and that the country looks forward to accessing the GCF in a more streamlined fashion with DAE support. However, the public sector within the country remains small. Many offices, including the NDA, have competing priorities that mean capacity to focus on GCF project proposal development and management is limited – whether DAE supported via the MoECCT (once accredited) or via IAE support. In addition, stakeholders noted the limitations in technical expertise in the country; with a small population, there are few national consultants available for climate finance project development and management, and often key experts are unavailable or working outside of the country.

AEs also noted challenges with the GCF that are persistent across their portfolios, including the low fees in relation to the costs associated with requirements for oversight and reporting. These challenges were noted as giving certain AEs second thoughts when they are considering whether to pursue GCF project development or partner with other donors. This affects the Maldives' ability to work with certain IAEs.

Details of the Maldives' difficulty in meeting GCF requirements for FP approval are further detailed below.

**The Maldives is only rarely seeking PPF support for FP development and has not yet had PPF support approved.** The Maldives is currently pursuing its first PPF submission for FP development. The country has identified several opportunities for prioritizing PPF support under the CP, but these other projects are not yet in development. For pipeline projects, stakeholders noted that the process of accessing the PPF has been very challenging. The PPF proposal and CN have received six rounds of comment and feedback over two years, with sometimes contradictory comments between rounds of feedback. It was mentioned that some of the feedback received on the CN was requesting the development of a full climate rationale, usually part of the feasibility assessment process during FP development. This process is cost prohibitive in this case without PPF support and was seen as an unrealistic request at the CN stage, especially when PPF support has not been approved. At this point, stakeholders engaged in the process mentioned that they are unclear as to what is holding back the PPF and CN approval process, and they are surprised because for the country this would be a transformational project that has strong national ownership. There is a perceived understanding that MICs and IAEs may be at a disadvantage compared to least developed countries (LDCs) or DAEs in the PPF application process, although this is not explicit in the GCF's PPF policy.

**Currently, stakeholders find the submission through appraisal process challenging to nearly impossible.** Stakeholders across the organizations consulted noted acute challenges experienced during the FP submission and appraisal process that make it seem nearly impossible to access GCF finance. This is a significant change from the pre-GCF-1 period, when the submission and appraisal process for FP007 was, by comparison, relatively streamlined.

**The challenges stakeholders mentioned facing during proposal submission and appraisal relate to the requirements for the climate rationale, the seemingly inconsistent and unpredictable nature of GCF Secretariat CN and proposal review, and the costs and time associated with proposal development.**

While stakeholders mentioned being impressed by the GCF's serious consideration of the climate rationale and theory of change, they also mentioned several challenges associated with developing a

climate rationale that meets GCF standards. In the case of FP165, the long-term historical climate data (30–50 years' worth) and locally downscaled risk information requested by the GCF to support the climate rationale for coastal erosion at the island scale was a hurdle for the proposal. Long-term climate data at the level requested by the GCF do not exist in the Maldives, and this was seen as an unreasonable request for project development in such a small country, lacking understanding of the unique situation of the island nation and the realities of developing countries' data collection and histories. In the end, the project submission required collection of primary data in the beneficiary islands over the span of one full year and further analysis to support the feasibility study and proposal. This was related to strengthening the climate rationale and demonstrating the linkage between coastal erosion and climate change. In the end, the justification of the project became different from the original concept. Stakeholders mentioned that it was helpful in this case that the IAE supporting proposal development (JICA) could afford to carry out the relevant studies, cited as costing over USD 1 million in total. In addition, during this process the GCF Secretariat actively provided advice and support to the IAE to enhance the climate rationale, which was highly appreciated by the IAE.

During CN and FP submission and appraisal processes, stakeholders cited experiences of frequent and inconsistent review from the GCF. The need for three independent GCF Secretariat Climate Investment Committee reviews prior to review by the independent Technical Advisory Panel was unclear, and there is perceived potential for consolidation of comments during the appraisal process. Stakeholders found it challenging to respond to the several rounds of comments from the GCF with limited numbers of staff dedicated to proposal development. These comment review and response processes were cited as creating lengthy delays in developing projects from CN to FP stage and as putting a strain on IAE and NDA resources. Project proponents received these comments not only through the digital comment portal but also via email from the Secretariat, which posed a challenge in accounting for and responding to comments. Stakeholders noted a desire for more consolidated, coordinated comments from the GCF where feasible during the review and approval process.

Comments and associated delays during review and appraisal, along with the studies and data collection required to support the climate rationale, result in high costs in terms of time, human resources and financial investment to develop successful GCF proposals and see them through submission and appraisal towards approval. These costs were mentioned by stakeholders consulted at all stages of the pipeline and led those interviewed to believe that the road to GCF project approval is challenging to nearly impossible. Some IAE stakeholders interviewed mentioned that they are strongly considering other options in lieu of the GCF for climate finance and that they see these costs as prohibitive. However, most other stakeholders did not seem to see these challenges as a reason not to pursue GCF finance but rather as areas that may be resolved with time and attention from the Secretariat, including reconsidering climate rationale requirements for LDCs and SIDS, additional consideration of proposal simplification, and streamlining of the PPF process.

In addition, the stakeholders consulted cited challenges related to the templates and formatting requirements required by the GCF when developing proposals for submission. Non-English-speaking NDAs and AEs experience a language barrier and find it challenging to meet GCF proposal requirements.

Interviewees cited a desire to learn from the experiences of other AEs and NDAs and have more access to accumulated institutional knowledge on navigating proposal development, submission and appraisal processes. For example, this could include a formalized sharing of lessons learned or a community of practice for AEs and NDAs to share experiences.

**Country stakeholders' feedback on the approval to FAA stage under GCF-1 is that it is more cumbersome or lengthy than previous experiences.** Stakeholders engaged in the approval process of FP165 did not note specific challenges with post-approval processes; however, the FAA is still



pending for this project almost one year after approval. In the case of FP007 it took almost two years to reach FAA finalization after approval.

### c. Sufficiency of funded activity implementation and supervision processes

There are no accredited DAEs in the Maldives, but stakeholders from AEs and project teams commented on activity implementation and supervision processes for IAE supported projects.

**The GCF has had limited but consistent engagement with IAEs during implementation to identify and manage risks and results; however, delayed response times and changing guidance were noted as implementation challenges.** For FP007, stakeholders noted that the GCF DCP has been responsive to requests for support and addressing risks. After a change in the national government administration and an initial delay in implementation, there was a joint GCF–AE oversight mission in year two of the FP007 project that enabled clearing of requirements for compliance and oversight with new government counterparts. More routine engagement with the GCF related to the project is coordinated via UNDP as AE, with UNDP managing the response to comments on APRs and the process of disbursement and extension requests. Stakeholders noted some inconsistencies in the GCF’s support. In some cases, the comments received on the APRs did not adequately account for prior APRs and asked questions related to comments that had been answered in prior reports. Likewise, stakeholders noted that there have been delayed responses to disbursement requests. These inconsistencies were noted as creating an additional burden for AEs and project teams in responding to the GCF. In general, the scale and level of reporting (including financial reporting) required from the government for the GCF was seen as heavier than for other donors.

For FP165, it is too early to comment on GCF engagement in supervision and implementation processes.

## 4. PROGRESS TOWARDS RESULTS AND IMPACT OF GCF INVESTMENTS

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

**GCF-funded activities are on track to deliver expected results in the Maldives.** Results reported to date are largely associated with the project Supporting vulnerable communities in Maldives to manage climate change-induced water shortages (FP007) (see Table 7 below). This project is set to close in late 2022 and has achieved many of its intended results as per the results framework. Stakeholders and observations indicate that the project has achieved the results that are reported so far and that it is on track to meet its end-of-project targets.

However, the team did have to adjust the number of target beneficiary islands from 49 to 25 during the course of the project. Stakeholders noted that this change was due to optimistic estimations during initial costing in the proposal and the need to react to changing costs and implementation realities. Not only had fuel and import costs risen by the time the project started implementation in earnest, but the project team adjusted plans to utilize the most up-to-date technology available during the construction of the IWRM. The project team did not want to miss the opportunity to introduce new technologies to communities due to cost prohibitions. Stakeholders consulted about the project noted that the results in terms of beneficiaries reached, scalability of interventions and paradigm shift remain at the level of the initial proposal and results framework, with some areas (such as knowledge-sharing and learning) exceeding initial expectations (as described below).

The project also experienced challenges in delivery due to the COVID-19 pandemic. The pace of implementation was slower during 2020 due to lockdowns and an inability to travel between islands

easily. In addition, the project relied heavily on global supply chains, so the pandemic was quite disruptive. However, this also meant that the project team adapted and focused on developing the digital learning platform, organizing data, and building capacities within relevant institutions and communities during the lockdown period. This focus on digital delivery created efficiencies for the project and enabled skills development beyond the level originally envisioned as part of the results framework.

Although FP007 has been successful in delivering on its stated outcomes during the project lifetime, stakeholders did note that some of the results of the project will not be seen until much later and cannot be adequately measured during the project itself. For example, many of the groundwater recharge activities will take time and may not be able to be accounted for until years into the future. Stakeholders noted that it may be helpful to have an opportunity for longer-term evaluation and/or results reporting beyond the scope of the project timeline to account for these kinds of delayed project impacts.

The implementation of FP165 is not advanced and is just getting started, but regardless, the project team is achieving early results. Efforts under way so far include a project site design related to beach nourishment and a detailed scoping study for JICA's technical cooperation related to the early warning system installation and beach maintenance. There is no indication from the case study process that the project would be off-track to deliver expected results, but it is too early to make a conclusive statement on progress.

**Table 7. Summary of evidence of outcomes**

OUTCOMES	EVIDENCE FROM GCF-FUNDED ACTIVITIES
Reduced greenhouse gas emissions	N/A
Increased resilience*	The Supporting vulnerable communities in Maldives to manage climate change-induced water shortages project (FP007) has increased regular access to drinking water in communities on 25 islands. In Dharavandhoo, this project has reduced the need for delivery shipments of bottled water for a community of over 1,000 residents with the coming online of a new 50m <sup>3</sup> reverse osmosis and rainwater filtration water facility in March 2022. There is no information yet available on changes to resilience due to FP165 as it is in the early stages of implementation.
Enabling environment**	The implementation of FP007 as an early GCF project and the first in the Maldives has been a learning process for all stakeholders involved. During the implementation of FP007, stakeholders noted that there has been a concerted effort at building the capacity of the PMU via AE support for processes such as APR development. In addition, the project's outcomes – including research on groundwater and the development of IWRM approaches – have informed the advancement of sustainable water management policy changes in the Maldives.
Co-benefits	For FP007, a significant decrease in plastic waste is a co-benefit of the reliable local drinking water access on inhabited islands. Previous water transports from other areas relied on plastic bottles. Stakeholders in Dharavandhoo mentioned that waste from plastic bottles on the island decreased by 50 per cent between March and May 2022, after the opening of the reverse osmosis water plant.
Other notable outcomes	In the wake of the COVID-19 pandemic, FP007 adapted its activities to build a digital learning platform to advance capacity-building and training activities via remote learning. This platform has been a very successful and well-received effort that the Republic of Maldives plans to carry on beyond the scope of this project.
Source:	Interviews and observations from the in-country mission in May 2022.
Note:	Does not include review of the project APRs. * 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 drivers influencing the achievement of the intended project-level outputs and outcomes are the ongoing impacts of the COVID-19 pandemic and the need to adapt to changes in GCF policies and guidance.** The pandemic greatly impacted the delivery of ongoing projects in the Maldives, including FP007. This project depends on inter-island travel and procurement of materials on the global market. With travel in the country halted for several months and strict lockdowns in place, project implementation came to a standstill. Global supply chain disruption and fuel prices affected the ability to source materials for construction of the IWRM systems. However, the project utilized this time during lockdown to develop new ways of working and advance the virtual learning platform that has been a successful output. The country soon reopened, and implementation could restart in earnest. The project is currently on track to meet its intended outcomes. However, the lingering effects of the COVID-19 pandemic are still challenging. Stakeholders noted that project finalization tasks, including the terminal evaluation and a transition plan for shifting the management of the IWRM systems to the state-owned utility company Fenaka Corporation and the State Electric Company Limited (STELCO), are rushed given the shortened project timeline. While the project received a six-month extension from the GCF to accommodate COVID-related delays, it has not been sufficient to accommodate all the residual delays encountered.

Throughout the implementation of FP007, changes to the Secretariat's policies and clarifications of interpretation of guidance have affected delivery. For example, FAA guidelines on project terminal evaluation have changed since project approval, and now the terminal evaluation is expected to be completed during the project timeline, prior to operational closure. Previously, the AE and PMU had understood that the terminal evaluation was required to be completed prior to financial closure only (several months after operational closure). This change has been a challenge to adjust to and accommodate while the PMU is also concentrating on the delivery of project activities. Similar challenges have arisen with the changing expectations regarding the project start date and end date.

**Overall, stakeholders perceived the GCF as inflexible for adaptive management, based on changing needs or emerging issues that might arise during implementation post-approval, including changes in national regulation.** FP007 experienced challenges adapting to new national regulations governing water resources management that were introduced during the project lifetime. This required time, consultation and adapting project activities to the new reality.

Other issues noted included the inconsistency of comments on the APR and template changes to the APR that require both time and attention from the AE and PMU. These challenges were exacerbated by a lack of sufficient guidance on APR and other processes and a lack of opportunity for the project team to engage with the AE in discussing changes with the GCF. Further, delays due to the inaccessibility of AE or NDA representatives were also noted.

FP165 is at an early stage of implementation, and key drivers influencing delivery of results were not noted.

**No unintended consequences associated with GCF-funded activities were identified in the Maldives.**

## **b. Progress of funded activities towards paradigm shift**

**GCF-funded activities in the Maldives show emerging signals of paradigm shift towards climate-resilient development pathways** (Table 8).<sup>3</sup> Paradigm shift is a key component of the GCF portfolio in the Maldives. Evidence of this is apparent at the local level and in emerging ways at the national and broader systems level. The water sustainability project (FP007) has transformed reliable access to water for remote islands and dramatically shifted local climate resilience. In addition, stakeholders interviewed mentioned that the project has had significant impact on the broader system of water management and associated policy in the country; integrated water resources systems constructed under the project have provided a model for government investment in similar systems in other parts of the Maldives, and climate-resilient water resource management capacities have been developed at the ministry and utility levels. The Building Climate Resilient Safer Islands in the Maldives project (FP165) is only just beginning but – through its development – has started to build capacity to develop coastal zones in an integrated, climate-resilient manner that enhances natural resilience. This project has a knowledge and technology transfer approach that enables training and capacity-building for local island councils to increase ownership of integrated coastal zone management into the future.

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<sup>3</sup> Emerging signals are those that suggest that paradigm-shifting processes are under way 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).

**Table 8. Summary of evidence of dimensions of paradigm shift**

DIMENSION	EVIDENCE FROM GCF-FUNDED ACTIVITIES
Scale* and replicability**	<p>The Supporting vulnerable communities in Maldives to manage climate change-induced water shortages project (FP007) identified a potential for scalability of the decentralized, small-scale integrated reverse osmosis water systems throughout the country. During implementation, stakeholders noted that the designs for the IWRM systems developed under the project have been taken up by the Water and Sanitation Department at the national level for potential application/construction on other islands beyond the scope of FP007. In addition, the groundwater studies that have been developed as part of the project are the first of their kind in the country, and they are informing national regulation and water and sanitation policy. They have been published via the project and allow for further awareness-raising and the basis of additional research into water resources management for the Maldives. There is a significant interest in expanding these studies to the entirety of the Maldives as a follow-on to this project. Stakeholders noted that they are starting to pursue this with other funders and agencies and would plan to use the same methodology that has been successful during the GCF project.</p>
Sustainability	<p>The FP007 project has facilitated technology transfer and capacity-building at the local island level to enable long-term sustainability of the IWRM systems. Stakeholders noted that the project developed a transition strategy with the Water and Sanitation Department to transfer responsibility of operations and maintenance of IWRM systems to the Department after the project ends. There are also processes in the works to transfer ownership of specific IWRM systems to utility operators: 10 of these systems have already transferred to Fenaka, and Fenaka engineers have been engaged in the process of developing and constructing the IWRM systems in an observer capacity in advance of this transition. Because these systems are collecting tariffs when they become operational, there is a cost-recovery component that enables the sustainability of operations beyond the lifetime of the project.</p> <p>The FP165 project is planning for sustainability from the beginning. Stakeholders noted that it is important that the Republic of Maldives will take over the project and disseminate the model and approach that will be established after the project ends.</p>
Source:	FP007 APR 2021 and SPR Maldives case study interviews 2022.
Note:	<p>*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 where a GCF project will be scaled up outside project bounds.</p> <p>** 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.</p>



*Figure 1. Combined rainwater and reverse osmosis water plant serving island communities*



Source: SPR Maldives country mission 2022.

Photo credit: Daisuke Horikoshi

**Box 1. How FP007 is working to maintain sustainability and achieve a paradigm shift**

The Supporting vulnerable communities in Maldives to manage climate change-induced water shortages project (FP007) was designed to provide safe and secure freshwater supply to the outer island areas of the Maldives via scaling up integrated water supply systems and improving groundwater quality. Prior to the project, island communities such as Dharavandhoo in Baa Atoll relied on bottled fresh water delivered from reverse osmosis desalination plants in Malé and other areas. This is due to pollution of the groundwater freshwater lens and the unreliable nature of rainwater supply given increasing precipitation variability and extended dry seasons exacerbated by climate change.

By constructing decentralized, integrated freshwater supply systems that utilize rainwater harvesting and filtration in combination with reverse osmosis (see Figure 1), the project has brought reliable year-round fresh water to 25 islands – a system change that not only enables water security by removing reliance on transported water but also reduces plastic pollution in the process.

To enable the sustainability of these systems beyond the lifetime of the project, the PMU and the Water and Sanitation Department of the MoECCT have been working closely with Fenaka Corporation and STELCO, the state-owned utilities, to build the capacity of their engineers and water and sanitation teams. In addition, in collaboration with island councils, the project is engaging the utilities in constructing integrated water systems in advance of the systems' operations being transferred to the utilities after project closure. For example, in Dharavandhoo the local Fenaka office has been observing the construction of the combined rainwater / reverse osmosis system and closely coordinating with the island council during the construction process. This engagement and capacity-building is designed to enable a smooth transition to Fenaka and STELCO operations. Tariffs gathered once water service is available to island residents will enable cost recovery for the utilities. However, the initial investment in construction from the GCF enables the utilities to maintain low tariff rates and provide sustainable access to water in the beneficiary communities.

Source: SPR Maldives country mission 2022.

**c. Women and other vulnerable populations, including indigenous peoples**

**In the Maldives, GCF-funded activities under implementation include women in capacity-building, decision-making and the sharing of benefits.** The Maldives interview partners noted that the government is strongly committed to gender equality and that engagement by women is generally high in climate-related project implementation and events. For FP007, there has been good

country ownership of the gender action plan, including engagement with the Ministry of Gender throughout and provision of technical assistance on activity implementation. Although many of the activities in the gender action plan that were planned during 2020 were moved to later in the project period due to the COVID-19 crisis and country lockdown, there is good evidence of the plan's implementation and women's participation in capacity-building and decision-making during the project. For example, elected Women's Development Committee (WDC) members – as participants in the island council – have been engaged in guiding the location and construction process for the IWRM systems. Women also make up over 50 per cent of the beneficiaries of the project.

For FP165, there is a gender action plan in place, but it is too early to comment on implementation. Stakeholders noted that the project design has taken a community-based approach and the team has consulted closely with local communities, including WDCs. The project expects to work closely with WDCs during implementation because they are the bodies responsible for beach maintenance on some of the islands.

#### **d. Catalysing public and private finance**

To date, GCF-funded activities have not been designed to further catalyse financial mechanisms or to unlock private investment. Co-financing for both approved FPs is via public finance. FP007 included co-financing from the Government of the Maldives, and FP165 included a significant amount of public co-financing from the Government of Japan, specifically for the purchase of monitoring equipment and systems. No projects have yet included private co-finance; however, stakeholders mentioned that there is potential for co-finance opportunities to be realized with the tourism sector, which relies on water and energy resources in country. Interviewees identified that there is a low-level of understanding of the GCF within private sector and non-governmental entities, particularly regarding how to access GCF opportunities or participate in structuring a project.

#### **e. Knowledge management and learning efforts within GCF-funded activities**

**GCF-funded activities under implementation show some evidence of knowledge and learning efforts.** While it is too early to comment on knowledge and learning efforts under FP165, FP007 has developed a robust online learning platform for IWRM knowledge exchange and capacity-building. This was developed as part of an adaptive management response to adjust the project to the realities of COVID-19. The system has been very successful in enabling participation from remote island communities and encouraging robust participation from across the various stakeholders involved in the project. Based on this success, this platform has been taken up by the ministries and Fenaka and is a successful model that will continue to be used beyond the project. Management of the content is being transferred to the Water and Sanitation Department of the MoECCT and the Maldives National Skills Authority and will be part of the final planned knowledge workshop as part of the close of FP007. Knowledge results also include the groundwater studies developed as part of the project, the first of their kind in the country. These are informing updates to national regulations on water and sanitation and have created a new awareness of the realities of groundwater in the Maldives. These studies have been published via the project, adding to the wider availability of technical information on water and climate change for the Maldives and potentially serving as the basis of additional research into water resources management. Stakeholders noted that these studies have helped raise the capacity of local firms in groundwater as well as interest in designing sustainable groundwater projects.

In addition to the above, stakeholders noted that learning results are mostly communicated to the GCF via the APR process.

## D. EMERGING LESSONS FOR THE GCF

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

- The Maldives' NDA demonstrates a proactive and entrepreneurial approach to GCF portfolio and pipeline management. The successful use of the CP to guide GCF investment prioritization and the CCG to facilitate ministry buy-in into the GCF process are examples that can inform other countries' GCF programming process.
- FP007 demonstrates successful planning for sustainability of the IWRM systems enabled by GCF investments beyond the lifetime of the project. The project team's proactive approach to transition planning and efforts to involve the water utilities from early in the project has smoothed the way for transferring the IWRM systems to utility management upon project closure.
- Delays in RPSP project approval influence country readiness and momentum in developing and managing a successful GCF pipeline. There is opportunity for the GCF to set and adhere to clear expectations for readiness support proposals and streamline review and approval processes. Due to persistent delays in RPSP proposal approval, the perception in the Maldives is that there is a lack of transparency in the RPSP process and that readiness funds are unnecessarily difficult to access. Plans built during the initial NDA readiness support project to develop a NAP and continue to advance country capacity have stalled as the readiness support efforts have been delayed.
- There are perceived inconsistencies in expectations for developing MICs, such as the Maldives, regarding prerequisites required for access to GCF finance. While the Maldives may have a robust tourism industry, it is still in need of development support in many areas and many systems are at LDC levels. For example, expectations regarding the climate rationale rely on and request data sets that are not yet available in country. In addition, the PPF process and requirements for approval lack clarity. It is perceived that MICs may not be as eligible for PPF support as other countries.
- DAEs need consistent access to support during accreditation processes, which the NDA often cannot provide. In the Maldives, the NDA team has many demands on their time, and given their limited capacity cannot always be the resource or conduit to connect with the GCF for interested DAE candidates.
- Changing expectations and policies affect the delivery of results and outcomes of GCF-financed projects. Projects under way have planned around certain FAA clauses and expectations that were set at the time of approval and FAA signature. When changes are made to these expectations mid-project, time is required to adapt and additional costs or timeline delays are often incurred.



## Appendix 1. LIST OF INTERVIEWEES

NAME	FUNCTION	AFFILIATION
Ahmed Zareem	Council Member	Dharavandhoo Island Council
Ahudha Khalid	Council Member	Dharavandhoo Island Council
Hussain Nazim	Council Vice-President	Dharavandhoo Island Council
Fathimath Rihla	Member	Dharavandhoo WDC
Mariyam Saniyya	Vice-President	Dharavandhoo WDC
Naidha Hassan	Member	Dharavandhoo WDC
Hussain Zaheen	Supervisor	Fenaka Corporation Limited
Nasma Rasheed	Engineer	Fenaka Corporation Limited
Yameen Abdulla	Surveyor	Fenaka Corporation Limited
Mohamed Adil	Assistant Manager	Fenaka Corporation Limited, Baa Atoll Dharavandhoo Branch
Diane McFadzien	Regional Manager	GCF/DCP
Princess Kaite Corporal	Regional Analyst	GCF/DCP
Samantha Rabine	Regional Officer	GCF/DCP
Kateryna Stelmakh	Advisor	GIZ
Paula Rolffs	Advisor, Partnering for Readiness	GIZ
Noboru Zama	Project Formulation Advisor	JICA Maldives Office
Hideaki Matsumoto	Director	JICA: Global Environment Department, Disaster Risk Reduction Group, Disaster Risk Reduction Team 2
Kotomi Masuda	Deputy Assistant Director	JICA: Global Environment Department, Disaster Risk Reduction Group, Disaster Risk Reduction Team 2
Megumi Tsukizoe	Deputy Director	JICA: Global Environment Department, Disaster Risk Reduction Group, Disaster Risk Reduction Team 2
Shinji Maruyama	Deputy Director	JICA: Global Environment Department, Office for Climate Change
So Ozaki	Associate Expert	JICA: Global Environment Department, Office for Climate Change
Zameela Ahmed	Country Manager	Live & Learn Environmental Education
Aminath Izdhila	Senior Training and Advocacy Officer	Maldives National Disaster Management Authority (NDMA)
Haleemath Nahula	Development and Resilience	Maldives NDMA
Hisan Hassan	Chief Executive	Maldives NDMA

NAME	FUNCTION	AFFILIATION
Safeenaz	Secretary-General	Maldives NDMA
Aishath Nashathi	Resource Mobilization Executive	Ministry of Finance
Mariyam Nashfa	Assistant Resource Mobilization Officer	Ministry of Finance
Mohamed Yammai	Chief Resource Mobilization Executive	Ministry of Finance
Aishath Aileen Niyaz	Director, Climate Change Department	MoECCT
Mohamed Musthafa	Director General, Water and Sanitation Department	MoECCT
Sobah Rasheed	Assistant Director, Water and Sanitation Department	MoECCT
Thibyan Ibrahim	Assistant Director, Climate Change Department	MoECCT
Susumu Onaka	General Manager	Nippon Koei: Port and Airport Division, Consulting Operations Headquarters (FP165)
Abdulla Ishan	Financial Officer	PMU for FP007
Abdulla Naseeh	Engineer	PMU for FP007
Alusham Hassan	Project Coordinator	PMU for FP007
Hassan Saeed	Monitoring Officer	PMU for FP007
Mariyam Nihayath	Procurement Officer	PMU for FP007
Mohamed Fazeeh	Project Coordinator	PMU for FP007
Shaheeda Adam	Project Manager	PMU for FP007
Wilshaana Moosa	Project Coordinator	PMU for FP007
Ahmed Zeenad	Managing Director	SDFC
Fathmath Haifa	Credit Manager	SDFC
Ibrahim Afsah	Deputy Manager	SDFC
Zeeban Saeed	Managing Director	Sea Shuttle Maldives
Adam Shaheer	Programme Associate	UNDP Maldives
Ahmed Shifaz	Assistant Resident Representative	UNDP Maldives
Aysha Solih	Programme Officer	UNDP Maldives
Enrico Gaveglia	Resident Representative	UNDP Maldives
Keti Chachibaia	Regional Technical Advisor, Climate Adaptation	UNDP, Nature, Climate, Energy Team
Jochem Zoetelief	Senior Programme Officer	UNEP, Science Division, Climate Services and Capacity Building Unit

Note: Due to legal and ethical considerations, we are not permitted to identify or list any agencies who have applied for but not yet received accreditation. These agencies are therefore not listed.

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