

Meeting of the Board

9 – 13 November 2020 Virtual meeting Provisional agenda item 19(b) GCF/B.27/13/Add.01

28 October 2020

Management response to the Independent Evaluation of the GCF's Environmental and Social Safeguards (ESS) and the Environmental and Social Management System (ESMS)

Summary

This document presents the Secretariat management response to the Independent Evaluation of the Green Climate Fund's Environmental and Social Safeguards (ESS) and the Environmental and Social Management System (ESMS) undertaken by the Independent Evaluation Unit (IEU).



- 1. The Secretariat takes note of the findings and welcomes the recommendations of the Independent Evaluation of the Green Climate Fund's Environmental and Social Safeguards (ESS) and the Environmental and Social Management System (ESMS) undertaken by the Independent Evaluation Unit (IEU). The GCF recognizes that projects and programmes come with environmental and social risks and impacts. The GCF not only ensures that its investments do not harm local communities or ecosystems, but also improves the environmental and social performance of activities it finances over time as it integrates environmental and social considerations into its decision-making and implement its operations in accordance with its existing relevant policies and practices.
- The Secretariat presents a response to the IEU's recommendations below, which includes our position and comments to each recommendation. The Secretariat agrees or partially agrees with all of the recommendations by the IEU and has either already taken actions to address the recommendations or is in the process of doing so. Actions that have been taken include improvement of internal processes, development of further guidance, and continued support to National Designated Authorities (NDAs) and Accredited Entities (AEs) through readiness support.
- 3. However, some of the recommendations also rely on the ongoing development and pending approval of Board mandated policies including the ESS and the Integrated Results Management Framework (IRMF). These and other considerations may therefore affect the delivery of the recommendation within the recommended timeline proposed by IEU.

Topic 1: Coherence of the ESS and ESMS

Full discussion found in document GCF/B.25/07, Chapter III, pages 23 – 45 [PDF file, pages 54 – 76]

	Page No.	Recommendation	Consolidated response
1.1	xxiii	The GCF's planned revision of its interim ESS standards needs to address gaps identified in this evaluation and should be customized to GCF's mandate. [Within a year]	Agree. The Secretariat agrees that the GCF's planned revision of its interim ESS standards needs to consider the gaps identified in the evaluation that is suited to its climate mandate in consultation with both internal and external stakeholders. The adoption of the new ESS has been included in the Board Workplan for 2020-2023.
1.2	xxiii	The GCF's planned revision of its interim ESS standards and the development of it ESMS must ensure environmental and social performance and co-benefits, as well as responsible investing principles, are integrated into the GCF's ESMS. [Within a year]	Agree. The Secretariat agrees that GCF must ensure that environmental and social performance co-benefits, as well as responsible investing principles, are integrated to the GCF's ESMS. Currently these are embedded within various GCF policies and frameworks. Identification of co-benefits within funding proposals at the design and review stage are stipulated in the initial investment framework, while reporting of environmental and social performance will



			be covered by the draft Integrated Results Management Framework (IRMF). The IRMF proposes a framework that would allow co- benefits to be identified and reported more systematically by AEs. Until an updated framework is adopted by the Board, the Secretariat shall be guided by the current investment and results management frameworks.
1.3	xxiii	The Secretariat should also focus on setting up operational guidance as well as reporting and monitoring systems that focus not just on environmental and social risks but also on performance and co-benefits. [Within a year]	Agree. The Secretariat agrees in principle with the value of setting up operational guidance as well as reporting and monitoring systems that focus not just on environmental and social risks but also on performance and cobenefits. The draft IRMF proposes a framework that would allow environmental and social co-benefits to be identified and reported more systematically by AEs. Subject to adoption of this by the Board, the Secretariat could implement relevant operational guidance.
		The development of the new ESMS should consider: a) specific and tailored guidance on newly adopted ESS, clarifying how the environmental and social principles of the ESP are integrated into screenings, environmental and social assessments, and due diligence processes used by the Secretariat,	Partially agree. The Secretariat envisions that the new ESS should contain sufficient guidance on the matter so that it will not be necessary to develop additional guidance documents. However, after the Board adopts the new ESS, the Secretariat will assess whether further guidance documents are necessary. This is included in the Board Workplan for 2020-2023.
1.4	xxiv	b) specific guidance for human rights due diligence,	Agree. The Secretariat will endeavor to address this issue, and stand guided by the Board as to what is included in the new ESS to be considered by the Board.
		c) a stakeholder engagement policy,	Agree. The Secretariat agrees that there is room for strengthening stakeholder engagement processes within countries and has been mandated by the Board to develop best practice options for stakeholder engagement. While the Fund has no stand-alone stakeholder engagement policy, the GCF is guided by the initial best practice options for country coordination and multi-stakeholder



			engagement. In addition, stakeholder engagement is one of the principles guiding how GCF will implement the ESMS. At the project-level, a GCF Guidance Note on Designing and ensuring meaningful stakeholder engagement on GCF-financed projects has been developed. The Secretariat stands guided by the Board as to the need to develop a Stakeholder Engagement Policy. Notwithstanding, the Secretariat will consider this in the development of the new ESS.
		d) specific and tailored guidance for the implementation of the gender policy that in turn adheres to international standards, and	Agree. The Secretariat is developing an operational manual as guidance for the implementation of the updated gender policy. The Secretariat agrees that this should adhere to international standards.
		e) monitoring and reporting tools, including a monitoring policy for ESS, environmental and social performance and cobenefits. [Within a year]	Agree. The Secretariat agrees with the value of establishing monitoring and reporting tools on environmental and social performance and co-benefits. It notes that it would be timely to do so after the Board's consideration and adoption of an IRMF, at the same time as relevant guidance and templates are updated.
1.5	xxiv	The GCF should plan to deal with the capacity gap of DAEs as it develops its new ESS standards. GCF's ESS/Sustainability Unit could learn important lessons from other agencies' experiences with direct access. [Within a year]	Agree. The Secretariat currently addresses the capacity gap of DAEs through readiness support. This is available for all DAEs who have become accredited and must satisfy conditions related to ESS matters. DAEs may also be the beneficiaries of readiness support to help them comply with other Boardapproved policies of the fund, including the new ESS standards, once it has been adopted by the Board.
1.6	xxiv	The GCF should commit to assessing the implementation of the updated gender policy to allow for improvements and revisions. [Within a year]	Agree. The updated gender policy was recently approved by the Board at B.24. More time will be needed to assess implementation, as only the funding proposals approved at B.25 onwards are expected to implement the policy. Further, the decision to revise the policy is a Board mandate as per the policy and should come from the Board.



	1		
			Partially agree.
1.7	xxiv	The GCF must develop guidance for identifying cobenefits and ensure these are monitored and reported with rigour and credibility. It should also consider responsible investing principles and adopt Key Performance Indicators (KPI) to guide projects on impact reporting concerning ESS. [Within a year]	The Secretariat agrees with the value of developing guidance for identifying, monitoring and reporting on co-benefits. The Initial Investment Framework already recognizes the value of co-benefits within the Sustainable Development criteria. Funding proposals with co-benefits will rate high as compared with similar funding proposals without co-benefits. A further accentuation of the appeal of co-benefits will be seen in the draft IRMF, which also addresses the identification and reporting of co-benefits. However, the development of the IRMF and the guidance accompanying it may take more than a year. As mentioned earlier, responsible investing principles are already incorporated within GCF's policies and frameworks.
1.8	xxiv	The GCF should develop clear guidance on the criterion of 'sustainable development potential'. [Within a year]	Agree. Sustainable development potential is recognized in the assessment of the investment criteria and is considered during the assessment of the funding proposals. The Secretariat has developed a programming manual that provides clearer guidance on the criterion of 'sustainable development potential', which includes guiding questions and good examples of application in approved funding proposals. The programming manual is intended to be published within 2020.
1.9	xxiv	Set up operationalized mechanisms with other agencies such as the Global Environment Facility (GEF) and Adaptation Fund (AF) to enhance complementarity at the fund, national, and activity levels. In developing the ESMS, the GCF should discuss opportunities for complementarity with the AF and GEF, including establishing more coordinated and holistic support for ESS from the RPSP. The GCF could also convene these agencies to explore an information-sharing system.	Agree. The Secretariat agrees that there is need for operationalized mechanisms for more complementarity and coherence. The Secretariat has been leading collaboration efforts with other Funds, including GEF and AF to identify opportunities for enhanced complementarity and coherence across a range of operational activities. This has included structured efforts to collaborate and share information to successfully replicate, scale up, and align synergies in new programming, as well as a Climate Funds Collaboration Platform on Results, Indicators and Methodologies for Measuring Impact. The Secretariat also holds regular



This system would consider	exchanges with all climate finance delivery
project approvals, high-	channels and hosts annual meetings with
achieving or problematic	other climate funds at the UNFCCC COPs
projects, and AE projects	where mutual progress and areas for further
recommended for additional	cooperation are assessed. There is potential
and/or future financing, while	to expand this collaboration into other areas,
also harmonizing applications	such as ESS. However, the Secretariat
and processes. [Within two	recognizes that additional resources are
years]	required to facilitate the creation of the
	platform and systems needed.

Topic 2: Process and operations

Full discussion found in document GCF/B.25/07, Chapter IV, pages 47 – 68 [PDF file, pages 78 – 99]

	Page No.	Recommendation	Consolidated response
2.1	xxiv	The GCF should consider developing an accreditation strategy that aligns with the GCF's Strategic Priorities. Specifically, re-accreditation should start to consider the extent to which entities have planned and realized cobenefits and climate, environmental, and social performance in their overall portfolios and recognized responsible investing principles. The GCF should ensure that the desk-based assessment undertaken during accreditation is replaced by a more robust procedure for assessing an AE's institutional capacity to monitor and report on the implementation of ESS management measures and environmental and social performance. [Within a year]	The Secretariat notes that the draft updated Strategic Plan for the GCF contains strategic directions and priorities related to accreditation including: (a) That moving ahead both accreditation/re-accreditation should be linked to value-addition to programming and filling gaps in coverage relative to countries' programming priorities; (b) To increase the share of DAEs and their role in programming (c) To ensure reaccreditation takes into account overall portfolio performance. The updated Strategic Plan for the GCF also indicates that a further analysis of the AE portfolio will be done to provide evidence to inform where the strengths and gaps in coverage and capabilities are, which could then inform a Board prioritization decision. In addition, the Secretariat has supported the Accreditation Committee in its development of an updated Accreditation Framework, which includes recommended improvements to the current institutional accreditation framework and proposed the project-specific accreditation approach. The recommendations include the consolidation of technical reviews fully under the Accreditation Panel (AP) (rather than having



			it also partly under the Secretariat during Stage I), and that the AP shall utilize a panel of firms to conduct its due diligence. The intent of requiring the AP to utilize such firms is to not only address capacity constraints, but also to facilitate language barriers and in-person presence through firms with local/regional/global presence. Beyond this, the AP conducts site visits for applicants, however, the extent of travel is contingent upon availability of budget, extent/duration of site visits needed, etc. The updated Accreditation Framework remains under consideration by the Board, and is included within the Board Workplan for 2020-2023.
2.2	xxiv	Increase support available to candidate DAEs before and after accreditation to address ESS requirements through the RPSP. [Within two years]	Agree. The Secretariat agrees to increase support to DAEs post accreditation to address ESS requirements which is readily available through readiness support. The Secretariat aims to make available training modules to build capacity and expertise of DAEs on ESS. Considerable readiness support is already available for entities prior to accreditation. This includes support for the identification and nomination of potential DAEs. The Readiness Programme also offers customized capacity assessments against the fund's accreditation framework for nominated DAEs as well as tailored capacity building support to close identified accreditation gaps for ESS and other areas. The Secretariat can provide more guidance to ensure NDAs and candidate DAEs are aware of this pre-accreditation support to increase uptake.
2.3	xxiv	Track and report on RPSP support for ESS capacity for candidate DAEs. [Within two years]	Agree. The Secretariat tracks and reports capacity support provided to DAEs. To the extent possible, the Secretariat will report on the capacity support provided specific to ESS.
2.4	xxiv	Consider a radical surgery on the PPF, based on its poor performance, to improve the processing times and targeting of the PPF. [Within two years]	Partially agree. The Secretariat has already taken action with regards to improving the processing times of PPF. The PPF application process has been revised and simplified in April 2020. Through this new process, we expect that the overall processing time will be greatly reduced. In addition, the Secretariat is providing



			different access options to PPF, which include, for example, the possibility for accredited entities to be directly supported in the preparation of their projects/programmes by a roster of highly qualified firms. On targeting, the Board decided PPF should support all AEs, especially DAEs, especially for projects in the micro-to-small size category. Currently, two thirds of the projects in PPF's pipeline and portfolio are supporting projects from DAEs to develop micro-to-small sized underlying projects.
			The Secretariat has also improved the coordination between the PPF and the Readiness Programme to ensure that there is appropriate support to DAEs/NDAs at the onset of the concept note development, which is intended to seek PPF support.
2.5	xxiv	Develop a systematic result monitoring and measurement system to monitor and report the progress and outcomes of the PPF. [Within two years]	Agree. The Secretariat currently has a system to monitor PPF pipeline and portfolio information. It is used to track individual PPF's status, progress and the final outcome, which is the submission of a funding proposal to the GCF. This system is also used for providing data to report PPF status at each Board meeting. The Secretariat continues to improve the system to reflect any new changes and requirements.
2.6	xxv	Ensure that the Secretariat continues to be engaged throughout the implementation stage of the PPF. [Within two years]	Agree. The Secretariat remains engaged throughout the implementation stage of all PPF applications, including monitoring the implementation status, continuous engagement with accredited entities, and providing additional support applying adaptive measures where required.
2.7	xxv	Reviews options to increase awareness of the PPF amongst stakeholders; increase staffing. [Within two years]	Agree. The Secretariat is currently taking action to increase awareness amongst stakeholders with regards to PPF. An updated guidance on the PPF will be released in 2020, translated into French, Spanish and Arabic. Webinars



	and other outreach activities will also be organized to increase awareness of the PPF.
	Increased staffing would be helpful to make sure the Secretariat has the needed capacity to rollout PPF plans and activities.

Topic 3: Project design and approval

Full discussion found in document GCF/B.25/07, Chapter V, pages 69 – 87 [PDF file, pages 100 – 118]

	_		
	Page No.	Recommendation	Consolidated response
3.1	xxv	Strengthen the process for identifying environmental and social performance and cobenefits and ensure they are robustly assessed and reported during the due diligence process by the Secretariat. [Within a year]	Agree. The Secretariat currently identifies environmental and social performance and co-benefits through the investment criteria under the Investment Framework of the GCF. The draft Integrated Results Management Framework (IRMF) proposes a framework that would guide AEs to identify and report environmental and social co-benefits more systematically. The Secretariat will aim to strengthen its due diligence process ensuring it is simple yet robust, informed by the Board's decisions on the IRMF.
3.2	XXV	In developing the ESMS, the GCF should: a) prepare guidance for AEs and for the Secretariat on how cobenefits may be identified for the proposed project/programme b) prepare guidance on how to quantify estimated co-benefits using impact indicators and c) prepare guidance on to how to integrate co-benefit monitoring with ESS monitoring. [Within a year]	Partially agree. Some of this is already detailed in the Initial Investment Framework, particularly the six investment criteria which the AEs have access to and must adhere to. The Secretariat will explore the need for additional guidance on how co-benefits may be identified in funding proposals for both internal and external use after we have a better assessment and measurement of co-benefits from our results management system. At such time, the Secretariat will ensure that the guidance is simple to use. The Secretariat also aims to develop training modules to be organized internally and externally. Guidance on impact indicators to quantify co-benefits and monitoring related to ESS will also be prepared, subject to Board approval of the IRMF.
3.3	XXV		
J.J	ΛΛΥ		



		The GCF should consider including equity into its guidance for 'Sustainable Development Potential'. [Within a year]	Agree. The Secretariat is currently developing a programming manual that provides clearer guidance on the criterion of 'Sustainable Development Potential' consistent with the initial Investment Framework as adopted by the Board. The IRMF also includes indicators that look at how projects promote equity for women, the poor and marginal groups. Further guidance will be developed subject to the Board approval of the IRMF.
3.4	xxv	The GCF should ensure that MAF tools and systems are operationalized and can capture the information necessary to follow up on FAA conditions. Specifically, the GCF should operationalize the portfolio management system. [Within a year]	Agree. The Secretariat is already working towards the operationalization of the MAF and a portfolio dashboard system that tracks AMA, FAA and disbursement conditions and stages of each project is already rolled out. An integrated portfolio performance management system is currently under development, with a rollout estimated within 2021 that will allow the Secretariat to assess implementation performance and identify early warning signals.
3.5	XXV	Establish procedures for addressing active CSO observer comments on FPs related to ESS. There should be policies and procedures for engaging CSOs at the Board level and also at the project level, and all relevant FP documentation should be made public. [Within two years]	The Secretariat, in consultation with the Co-Chairs, is currently leading the review of the "Guidelines relating to the observer participation, accreditation of observer organizations and participation of active observers" for Board consideration in 2021, which can address the engagement with CSOs related to ESS at the Board level. The updated guidelines would be subject to approval by the Board and their implementation would entail additional resources related to staff and capacity building. The Secretariat agrees that all relevant FP documentation should be made public by the GCF in accordance with the Information Disclosure Policy. Robust implementation would entail additional resources related to staff, capacity building, and IT. Avenues for engagement of stakeholders are also provided in the conduct of environmental and social assessments and stakeholder consultations at the project level.
3.6	xxv	If the PPF is to continue, it must build internal (Secretariat)	Agree.



capacity to strengthen and	The Secretariat agrees that internal capacity
build the likelihood for realizing	or engaging professional services would help
environmental and social	the Secretariat's ability to support innovative
performance and co-benefits,	projects, subject to additional staffing and
while focusing on getting	budgetary requirements, which would need
innovative projects ready for	Board approval.
GCF support. [Within two	
years]	

Topic 4: Project implementation and results

Full discussion found in document GCF/B.25/07, Chapter VI, pages 89 - 105 [PDF file, pages 120 - 136]

	Page No.	Recommendation	Consolidated response
4.1	xxv	The RMF must be urgently updated to incorporate reporting on environmental and social impact and outcome level indicators. The refinement of social, environmental, economic cobenefit indicators at both Fund impact level and project/programme outcome level is currently missing. Smart co-benefit indicators would provide a better sense of how project-specific outcomes and impact indicators will be aggregated to provide meaningful measures of GCF's overall environmental and social performance. [Within a year]	Partially agree. As mentioned above, the Secretariat has already undertaken work on updating the results management framework. The draft Integrated Results Management Framework (IRMF) proposes a framework that would allow environmental and social co-benefits to be identified and reported more systematically by AEs, while retaining flexibility for projects to define indicators relevant to their activities and context. At the Fund outcome level of reduced emissions and increased resilience, the framework proposes 19 indicators which reflect elements of social, environmental, and economic co-benefits. It also facilitates AEs definition of relevant co-benefits at the project/programme outcome level. The final framework and indicators are subject to the consideration and approval of the Board.
4.2	xxv	The Secretariat should consider aligning reporting on investment criteria with RMF-related reporting. [Within a year]	Agree. The Secretariat has developed the proposal for the IRMF in alignment with the initial Investment Framework and its six criteria, including the activity-specific sub-criteria. This has been included in the Board Workplan for 2020-2023. Subject to adoption of the IRMF by the Board, this could facilitate improved alignment of reporting on the investment criteria with wider reporting of results under the IRMF.
4.3	xxv	The Secretariat needs to set-up an early warning system as	Agree.



		part of the MAF to assist the assessment of risks related to the project ('project risk flags') and risks related to the overall performance of the AE ('AE risk flags'). [Within a year]	The Secretariat is currently developing a portfolio performance monitoring system (PPMS) and performance indicators to determine the health of projects and categorize projects based on risks. Currently, the Secretariat also monitors and manages projects proactively that may encounter problems and has high risks through status report meetings where risk flags are raised and continuous monitoring and follow-ups with AEs. To mitigate future risks, the Secretariat has also improved its internal processes to involve relevant colleagues in the early stage of the review of proposals resulting in better preparedness and understanding of weaknesses and risks that may occur during implementation.
4.4	xxv	The Secretariat must clarify staff roles and responsibilities for monitoring and reporting environmental and social performance and cobenefits. [Within a year]	Agree. The Secretariat has developed an Operations Manual which aims to clarify internal processes for increased efficiency and effectiveness. This may also clarify roles and responsibilities of divisions and offices. The Secretariat will continue to clarify roles and responsibilities of staff which would need to be guided by management.
4.5	XXV	Any portfolio management system set up to operationalize the MAF should include information on AE accreditation, recent project reports, interim/final evaluations, follow-up FAA conditions, and performance on environmental and social benefits. [Within a year]	Agree. The Secretariat is already in the process of updating its online IT systems through the Online Accreditation System (OAS) to accommodate the application and review process for new accreditation applicants as well as the submission and review of: (i) information related to accreditation conditions to address capacity gaps against GCF fiduciary, ESS and gender standards; (ii) annual self-assessments as required under MAF; (iii) mid-term review reports as required under MAF; (iv) re-accreditation application and assessment of AEs. The current IT systems are already used for accreditation applications and assessments, and other IT systems for managing and tracking the status of accreditation conditions. A new Digital Accreditation Platform (DAP) is under development, which will replace the current OAS.



			As indicated above, the Secretariat is currently developing a portfolio performance monitoring system (PPMS) to monitor portfolio performance.
4.6	xxvi	Improve the APR template so that it can report reliably on environmental and social impacts, outcomes, and cobenefits. [Within two years]	Partially agree. The Secretariat already requests for this information through the current APR template which includes environmental and social outcomes and co-benefits under the section on investment criteria. In addition, a section solely devoted to ESS is built-in allowing AEs to confirm compliance of implemented activities with ESS and gender requirements.
			The Secretariat will continue to review and update the APR based on new realities and in consideration of the IEUs recommendation, and the Board's consideration of the IRMF.
4.7	xxvi	Require AEs to promote awareness of project-level GRMs throughout the life cycle of the project and strengthen awareness-raising activities regarding the GCF Independent Redress Mechanism. [Within two years]	Agree. The Secretariat, through the GCF Environmental and Social Policy requires the AEs to establish activity-specific grievance redress mechanisms as appropriate and inform all stakeholders of and provide access to the Independent Redress Mechanism (IRM), which is also mandated to undertake outreach to raise awareness about the IRM. Nonetheless, the Secretariat will further consider initiatives towards strengthening the AE's awareness-raising activities on project-level GRMs and the GCF IRM.
4.8	xxvi	Ensure it can carry out ad hoc checks that take into account early warning system risk flags. [Within two years]	Agree. As noted in our response in 4.3, an early warning system which includes performance risk flag and an overall risk assessment of projects is already under development. In addition, the Secretariat at an advanced stage of developing an ad-hoc Procedure for Funded Activities as internal guidance on the processes and modalities for undertaking adhoc checks and site visits of projects deemed to be at high-risk based on the early warning system criteria.



Topic 5: REDD+

Full discussion found in document GCF/B.25/07, Chapter VII, pages 107 – 119 [PDF file, pages 138 –150]

	Page No.	Recommendation	Consolidated response
5.1	xxvi	Takes steps to evaluate the REDD+ pilot programme with a focus on examining its effectiveness and alignment with the WFR, while drawing on lessons learned from other initiatives. [Within two years]	Agree. The Secretariat agrees that steps should be taken to evaluate the REDD+ pilot programme. A mid-term evaluation has already been completed and the findings were presented at the twenty-fifth meeting of the Board.
5.2	xxvi	Provide detailed guidance on Cancun Safeguards and draw on lessons learned from the exante application of Cancun Safeguards on the GCF portfolio. [Within two years]	Partially agree. The Secretariat will promote and support the application of the Cancun Safeguards through its assessment of REDD+ proposals. However, GCF will not provide any additional guidance on Cancun Safeguards to avoid any misinterpretation of UNFCCC COP decisions.
5.3	xxvi	Clarify the concept of co- benefits and strengthen guidance for their identification, monitoring, and reporting amongst REDD+ investments. [Within two years]	Partially agree. The co-benefits are all other benefits than emission reductions or enhancement of carbon stocks. While it is important to understand their nature and their impact, there isn't any requirement to monitor and report them under any UNFCCC decision for REDD+ neither in the GCF Logical Framework for REDD+.