

## Annex VI: Management Action Report on the Independent Evaluation of the Green Climate Fund's Country Ownership Approach

- Decision B.BM-2021/07 established the Green Climate Fund's Evaluation Policy (see document GCF/BM-2021-09). This Policy describes how all evaluations (or reviews or assessments) submitted by the IEU to the Board will have an official management response prepared by the GCF Secretariat (prepared in consultation with relevant GCF stakeholders) to inform Board decision-making (see paragraph 58 (g)/appendix III).
- 2. Management action reports are prepared by the Independent Evaluation Unit and received by the Board to provide an overview of the Board's consideration of the recommendations, respective management responses, and the status of implementation (see GCF/BM-2021/09, paragraph 28, paragraph 64 (b) / appendix I / appendix III).
- In preparing this MAR, the IEU considered the Secretariat's management response to the Independent Evaluation of the GCF's Country Ownership Approach (GCF/B.27/12/Add.01). Decision B.30/11 invited members and alternate members of the Board to consider the findings and recommendations, and corresponding secretariat management response of the Independent Evaluation of the GCF's Country Ownership Approach alongside four other IEU evaluations. As requested in this decision, the IEU prepared a summary of views expressed by members and alternate members of the Board on each evaluation. This summary was annexed to the IEU's 2021 Annual Report (GCF/B.31/Inf.09).
- 4. The summary text on the Independent Evaluation of the GCF's Country Ownership Approach (hereafter COA Evaluation) highlighted that Board members commonly endorsed the evaluation's recommendations about further strengthening the capacities of NDAs and national focal point, with most submissions agreeing that special attention needs to be given to private sector engagement, among other things. Some Board members also supported the idea of developing an accreditation strategy for the GCF to better guide the DAE nominations by NDAs.
- 5. The summary text also highlighted Board members' general endorsement of the evaluation's recommendation that country ownership needs to go beyond national governments to include civil society, private sector, NGOs, vulnerable groups, women and indigenous peoples, with better multi-stakeholder engagement commended by a number of Board members. Some Board members emphasized that the NDA should have a leadership role in facilitating multi-stakeholder engagement.
- 6. Other Board members expressed that the COA evaluation did not adequately reflect the sovereign aspect of country ownership, as espoused in the GCF's Governing Instrument and relevant COP decisions and GCF Board decisions. They stressed that country ownership as the recipient country's sovereign right, which is exercised through the NDAs in the context of national climate strategies, is the GCF's core principle that cannot be altered.
- of the 9 recommendations of the evaluation, the Secretariat agrees with 3 recommendations and partially agrees with 6 recommendations. The Secretariat did not disagree with any of the recommendations.



- 8. For each recommendation made by the IEU evaluation, this MAR provides a rating and commentary prepared by the IEU. The draft rating scale and commentary were shared and discussed with the Secretariat prior to the writing of this report. The comments provided by the Secretariat were then taken into account in the preparation of the MAR. The rating scale for the progress made on the adoption of recommendations is as follows:
- (a) High: Recommendation is fully incorporated into policy, strategy or operations.
- (b) Substantial: Recommendation is largely adopted but not fully incorporated into policy, strategy or operations yet.
- (c) Medium: Recommendation is adopted in some operational and policy work, but not significantly in key areas.
- (d) Low: No evidence or plan for adoption, or plan and actions for adoption are at a very preliminary stage.
- (e) Not rated: Ratings or verification will have to wait until more data is available or proposals have been further developed.
- In terms of the progress made with the adoption of the 9 recommendations set out in the evaluation, the rating "substantial" is given to one recommendation, the rating "medium" is given to two recommendations, and the rating "low" is given to 6 recommendations.



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1a	other climate and development organizations.  In this context, the GCF should	The ambition of the GCF in setting a new standard of country ownership is indeed an important one. In that respect, the GCF has developed its Guidelines for Enhanced Country Ownership, which serves as the normative standard for the GCF. The guidelines cover how different stakeholders – NDAs, AEs and the	Low	The GCF's Governing Instrument describes how the Fund will pursue a country-driven approach and promote and strengthen country level engagement at the country level through by effectively involving relevant institutions and stakeholders. Country drivenness is a core principle affirmed in decisions 08/10, 08/11, B.10/10, B.17/21 and 18/02. These earlier decisions were supplemented by decisions B.21/16 and B.23/11 which emphasized the importance of accrediting entities that advance the GCF's mandate and objectives.  In addition, decision B.29/01 provided additional resources under the Readiness and Preparatory Support Programme for direct access entities. The IEU also notes the Country Programming Guidance published 25 January 2021.  The Board adopted the Guidelines for Enhanced Country Ownership and Country Drivenness in annex XX to decision B.17/21. The Guidelines were adopted prior to the publication of the IEU's independent evaluation of the GCF's Country Ownership approach and were thus accounted for within the evaluation. The document covers guiding principles, the role of country programmes and structured dialogues, the role of country ownership (CO) in the GCF's operational modalities, and evaluation.  However, as explicitly stated in paragraph 4 of the Guidelines, the document "does not attempt to provide a further definition of the concept of country ownership." Moreover, it does not address the tensions and impracticalities resulting



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				from country ownership being both a principle and an outcome (as described in the investment criteria).
				The Secretariat indicated it initiated a review of the Guidelines in October 2020. The review included a survey, indepth discussion, and a review of key documents. In 2020 and early 2021, the Secretariat consulted with NDAs, IAEs, DAEs, other stakeholders and key GCF Secretariat staff. The review was submitted to the Board at B.30 as information GCF/B.30/Inf.11/Add.03. The Secretariat underscored that the review included several recommendations to strengthen country ownership which considered stakeholder feedback and the IEU's independent evaluation of the GCF's country ownership approach.
				The Secretariat further indicated that, after B.30, it drafted a Policy Concept Note (PCN) on revising the country ownership guidelines. As of August 2022, the PCN was under review and discussion within the Secretariat. The Secretariat noted that the draft PCN includes updated guidelines to strengthen country ownership processes, an updated no-objection procedure, and stakeholder engagement guidelines.
				The IEU acknowledges that the review submitted at B.30 sets out the lessons learned during the guidelines' implementation and makes recommendations for strengthening country ownership. However, the IEU also notes the report does not address the lack of a normative standard for country ownership or the tensions found in the evaluation and highlighted in recommendation 1a.



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1b	Make country ownership an eligibility condition, not a prioritization criterion for investment decision-making.  More accountability around NoPs could help ensure that NoLs can be interpreted as a valid signal of broader country ownership.  Drawing on the experience of other global funds, for example, the GCF could consider requiring transparent documentation of NoPs.	Partially agree.  Country ownership is an essential and fundamentally important requirement for the GCF in its investment decision-making.  Furthermore, country ownership is built during the design and development of projects and programmes, and thus needs to be assessed for different aspects during the different stages of the project cycle. Thus, it is more appropriate as an investment criterion than a one-time eligibility criterion, which may result in projects and programmes being eliminated prematurely.  The Secretariat does however agree that there is room for more transparency and accountability around the no-objection process within countries. Several countries have made their no-objection procedures transparent to all stakeholders. The GCF will also make available such procedures on the country pages on its website once available from countries.		The Secretariat has not published the no-objection procedures on the respective country pages, including for countries that have previously submitted no-objection letters. This lack of transparency conflicts with the provisions of the initial no-objection procedures. These provisions require the Secretariat to publish the no-objection procedure (NOP) on the GCF website (Annex XII to decision B.08/10, para. 12).  As mentioned above, the Secretariat submitted a review of the Guidelines for Enhanced Country Ownership and Country Drivenness to the Board at B.30 in information GCF/B.30/Inf.11/Add.03.  The IEU notes that the report identified the lack of transparency of NOPs as a challenge for GCF country ownership processes (para. 21). The report indicates that "additional oversight mechanisms or guidelines are needed in country coordination structures to ensure transparency on NOP so that individual officers do not abuse power" (para. 21(a)).  The Secretariat further indicated that the draft PCN on revising country ownership guidelines includes enhanced NOPs and stakeholder engagement. Specifically, it underscored that the updated NOP will ensure more transparency through proper documentation and increased awareness of what is approved under NOP process. The change is proposed based on best practices of the Global Fund and other multilateral financing mechanism, so that members of national climate coordination group and lead agency, the National Designated Authority (NDAs) will follow a



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				transparent process to issue NOLs. In addition, based on feedback from the countries, the NOL templates will be revised for clarity on compliance responsibilities. Once finalized, the updated NOP will be published.
1c	Strengthen the approach to stakeholder engagement by reformulating definitions and principles of engagement, especially for non-state stakeholders within countries.  GCF guidance should recognize the special space for engaging the minority, the disenfranchised and the vulnerable, because they are most affected by climate change.  Guidance should also recognize the important role of subnational actors. It should clearly define what is meant by terms like "civil society" and be more specific about what constitutes meaningful engagement.  Tangible examples of best practices would also help. The GCF can and should set new standards in this space.			The Secretariat submitted the Review of Guidelines for Enhanced Country Ownership and Country Drivenness (GCF/B.30/Inf.11/Add.03) for the Board's consideration under B.30 agenda item 'Report on the Activities of the Secretariat.' The item was not opened. The review summarizes the lessons learned from implementing the Guidelines for Enhanced Country Ownership and Country Drivenness. The review also includes stakeholder feedback and a review of other international organizations' best practices to identify opportunities for strengthening GCF's guidelines on country ownership and country-drivenness.  In May 2022, the Secretariat published the Sustainability guidance note: Designing and ensuring meaningful stakeholder engagement on GCF-financed projects. The draft guidance note is not a GCF policy and is not mandatory. As its name suggests, the guidance note offers direction on meeting the requirements for stakeholder engagement and consultation outlined in GCF policies.  The draft PCN for the updated CO guidelines outlines the requirements for robust stakeholder engagement throughout GCF's project cycle management. It also highlights processes for robust stakeholder engagement in the NDA-led consultation and coordination meetings.



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		updating the GCF's guidelines for stakeholder engagement.		
1d	Promote the public release of documents  The transparency and public release of key documents, such as CPs and APRs, is critical for public accountability, as well as to enable NDAs / focal points to provide oversight of their GCF portfolios.		Low	Decision B.12/35 outlined the GCF's Information Disclosure Policy regarding the information the GCF makes available to the public, either on a mandatory or optional basis.  The Secretariat indicated that, as of August 2022, 32 Country Programmes (CPs) are available on the GCF website. Four were published in 2017, 10 in 2018, 8 in 2019, three in 2020, four in 2021, and three in 2022.  Regarding Annual Performance Reports (APRs), the Secretariat indicated that all the 2019 and 2020 reports are on the GCF website, except for those the AEs indicate as confidential.  The IEU notes a time lapse between the Secretariat receiving the APRs and publishing them on the GCF website. The Secretariat indicated the 2019 APRs were uploaded in September 2021, while the 2020 APRs were uploaded in May 2022.  APRs for 2017 and 2018 are yet to appear on the website. The Secretariat noted this was due to capacity constraints.  The Secretariat said it would send a "draft Information Disclosure Policy" to the Ethics and Advisory Committee (EAC) for review in Q4 of 2022. The Secretariat further noted that the EAC approved version will be circulated for internal and external consultation in 2023, prior to Board



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1e	systems, such as public finance management systems, procurement systems, and results systems.	Agree. The GCF encourages AEs to use country institutions and their systems for the implementation of projects and programmes subject to any restrictions by the AE's own policies. In fact, the direct access modality allows the GCF itself to rely on such country systems where national entities have demonstrated their ability to comply with the GCF's financial management, procurement and results management systems. Such use can also be tracked through information reported in APRs.		The Independent Evaluation of the Green Climate Fund's Country Ownership Approach found that the use of country systems throughout the project cycle – from design and implementation to monitoring and evaluation – is not a part of GCF guidance, nor is it systematically tracked by the GCF (p. 114). As of 22 July 2022, the APR template does not mention country systems. The explanation provided for question 2.2.5, which monitors progress on the country ownership investment criteria, does not list the use of country systems as a potential indicator. However, the Secretariat emphasized that AEs include information on the use of country systems in the narrative report within their APR. This is subject to selected verification checks by the Secretariat on the AE's portal and websites.  On a related note, the Secretariat stated that using country institutions and their systems in projects and programmes aligns with the GCF's efforts to accelerate climate finance. The Secretariat provided several examples from ongoing projects and programmes. These include (i) strengthening existing frameworks for planning and budgeting processes at national and sub-national levels, thus ensuring vertical and horizontal alignment, (ii) mainstreaming climate-resilient approaches in public procurement processes for a particular given value chain, and (iii) strengthening innovative financing frameworks such as thematic bonds to supplement public financing with capital markets.  The IEU underlines that the independent evaluation of the GCF's CO approach defined country systems as in-country procedures and institutions for procurement and financial



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				management, as well as recording climate finance aid in the government budget (p. 21). The IEU notes that the Secretariat referred to a different meaning of country systems and does not refer to public financial management systems.
2a	r -	Partially agree.  The Secretariat agrees that further measures can be undertaken to enhance the capacities of NDAs or focal points. While a handbook titled "Engaging with the Green Climate Fund: A resource guide for national designated authorities and focal points of recipient countries" was developed in 2015 to reflect key Board decisions taken in the early years of the GCF, the Secretariat will update it to incorporate new roles/responsibilities foreseen for NDAs/focal points in subsequent decisions since 2015. Such an updated handbook will also include examples of good practices by different developing countries.  Financial support is being provided to NDAs or focal points as well as DAEs through the Readiness Programme evolving to		On 13 July 2022, the Secretariat updated NDAs, Readiness delivery partners and AEs on operational improvements to the GCF's Readiness and Preparatory Support Programme.  The Updated Strategic Plan (USP) for the GCF 2020 -2023 (decision B.27/06, annex VI) says in paragraph 17 that the Readiness Programme will continue supporting capacity-building for NDAs and DAEs. The USP's strategic objective of catalysing private sector finance at scale also mentions strengthening capacity among NDAs, AEs and local private sector partners. This strengthening will support private investments in climate activities, including supporting climate-oriented local financial systems, institutions, markets, and green banks (decision B.27/06, annex I, para.21(a)).  The Secretariat clarified that it has provided training regarding the GCF to NDAs/focal points through several avenues. These include webinars, peer-to-peer virtual learning sessions, NDA-targeted training materials such as the 2015 handbook 'Engaging with the Green Climate Fund', in-person training (pre-COVID-19), virtual workshops and structured dialogues. The Secretariat also provided technical assistance in the form of enhanced support for co-developing Readiness proposals and funding proposals that include public and private sector engagement.



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	to be substantial but can be critical and should be paired with sustained training.  NDAs / focal points need a clearer mandate for the oversight role they are expected to play during project implementation.  NDAs / focal points need to be recruited, trained and supported	support for up to 2-3 years needed to augment their capacities. The Secretariat would need to assess the benefits and risks of salary topups, and present it for Board consideration.  In the meantime, the Secretariat is exploring other options such as short-term and long-term expert placements for NDAs or focal points and DAEs.  As for the oversight role of the NDAs/focal points, this is spelled out in both the Best Practice		The Secretariat underscored that it has not assessed nor considered "topping-up" NDA salaries. This has not been considered, as this could lead to various non-compliance issues with national civil service commission laws regarding public servant salaries.  The Secretariat indicated that in relevant and appropriate countries such as those considered SIDS and LDCs, it has encouraged NDAS/DAEs to use Readiness resources to embed long-term consultants. Consultants can provide direct support in conducting the functions GCF requires from NDA/DAE offices. Such functions may include supporting NDA coordination, developing CPs and supporting reviews of proposals for NOL processes. The Secretariat indicated that this form of capacity support to NDAs has been successful in a number of countries.  Furthermore, the Secretariat underscored that, in addition to long-term local consultant support, the GCF Readiness grant also provides Project Management Budget and AE fee to support the NDA with project oversight, management and administrative costs, including costs for administrative staff, auditing and Project Management Unit operations.



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2b	the Secretariat and (its divisions) by building the right incentives and opportunities for staff to provide advisory support to countries that maximizes impact on countries' climate needs and strengthens countries' ownership of GCF investments.  The Secretariat should reorganize itself with the aim of providing the best solutions and support to countries. Countries need access to GCF representatives who have detailed knowledge of both the GCF and national and regional circumstances, and who can provide technical assistance to	Agree.  The Secretariat has been restructured to strengthen its support to countries. It has also further integrated country and regional managers into the teams reviewing concept notes and funding proposals to ensure greater alignment with country ownership principles, and into the teams monitoring progress during implementation. The GCF onboarding and performance management systems are also being developed to further reinforce incentives for all staff to strengthen country ownership. In addition, the Secretariat is increasing technical assistance capacity through the Readiness Programme to support the planning and project development needs of countries.	Substantial	GCF performance is driven by its USP, adopted by Decision B.27/06. GCF/B.31/Inf.02/Add.02 outlines the Secretariat's progress report on the implementation of the USP 2020–2023. The Secretariat's report claims the Readiness Programme now delivers more sophisticated country support interventions.  As noted in the Management Response, the Division of Country Programming (DCP) was restructured in 2020. The June 2022 GCF Appraisal Guidance clarifies the DCP's responsibilities for coordinating and reviewing CPs. It also explains the DCP's responsibility within the project idea development phase in Stage 1 / CIC1, alongside the role of NDAs, investment criteria and sustainability appraisal.  Additionally, the Secretariat indicated that country ownership, including engagement with NDAs, AEs and DPs, is tracked in the DCP's corporate and divisional performance indicators. The Secretariat listed the following indicators as relevant:  KPI 1.1 "Coordinated engagement of NDAs, AEs and DPs on USP and GCF-1 programming goals." Within KPI 1.1, there are sub-KPIs that track and monitor country ownership and engagement. KPI 1.1.1. "Fund-level programming communications and guidance developed and maintained" related to the Secretariat's participation in country events.  KPI 1.1.2. "10 dedicated programming engagements" is linked to participation in country-level dialogues, which involves active engagement with NDAs, including topics related to country programming.



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				KPI 1.2 "Number of country programmes and multi-annual entity work programmes endorsed with aligned, GCF-facing investment plans and pipelines." This indicator includes specific targets for CPs and entity work programmes.
				The IEU notes that KPI 1.1.1 and 1.1.2. were introduced in the 2022 work programme while targets under KPI 1.2. were introduced in the 2021 work programme.
2c	Pursue CPs only if their purpose and clarity are developed and well communicated. GCF should develop a CP strategy that provides:  A sound rationale and clear incentives for countries to develop CPs that explain how CPs may contribute to fostering agreement between government and non-government actors on GCF investment priorities. The CP strategy should also indicate how CPs may support paradigm-shifting and high-impact objectives of the GCF.	inform the development of relevant RFPs. However, the lack of detailed guidelines, a flexible approach to CPs and the parallel processing of CNs and FPs while countries were still in the process	Medium	The Secretariat published the GCF Programming Manual and the Operations Manual in July and August 2020, respectively. The Programming Manual mainly targets external stakeholders and clarifies the different steps of the GCF project/programme lifecycle. In contrast, the Operations Manual is an internal document that details the processes, roles and responsibilities of the Secretariat's units during the cycle. Both manuals identify CPs and entity work plans (EWP) as the main GCF origination channel. The Operations Manual states the need for alignment between CPs and EWPs. It identifies alignment with CPs as one element in the review of FPs by the CIC2. The Programming Manual also highlights the CPs' objectives, including ensuring stronger country ownership, stakeholder buy-in and project prioritization in the GCF pipeline (p.8).  The Country Programme Guidance was published in January 2021 and further clarifies the different components of a CP.
	An indication of the scale of resources that will be programmed by the GCF both globally and by country during	of developing their CPs have not adequately served this purpose. To address this, the Secretariat has developed programming and		Notably, the guidance encourages countries to align with the GCF's strategic plan and related sector guidance for a given programming cycle.



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	its strategic plan period. Benchmarking analysis shows the importance of this in contributing to country-level planning. So far this guidance has been informally communicated which is not propitious for transparency and predictability. Clear guidance on GCF eligibility considerations, investment criteria, and funding modalities is required and should inform pipelines in CPs to help ensure they are compatible with GCF objectives. Benchmarking analysis shows that, when CP processes fall short on these points, they are not effective in identifying project ideas that are eligible for funding, especially where country stakeholder capacities are low.	operations manuals to clarify and reinforce the role of CPs in the project cycle and has also developed further guidance on CPs building on the initial general guidelines for country programmes provided for by the Board (decision B.08/11, annex XVII) for countries to develop CPs that will help the GCF better achieve the intended purpose of CPs.  The scale of resources to be programmed globally will be driven by the Strategic Plan when adopted by the Board. In this context, the Board may also consider the scale of resources to be programmed by each country or groups of countries as may be appropriate.		The GCF's USP for 2020-2023 sets a goal of programming 40 per cent of available resources by the end of 2021 and 95 per cent by the end of 2023 (decision B.27/06, Annex VI, para. 28(a)). The plan does not consider the scale of resources programmed by country.
2d	Take leadership in building a 'choice- architecture' that provides the capabilities, opportunities and motivations for countries and GCF Secretariat staff to choose and	Partially agree.  The development and submission of CPs forms stage 1, step 1 of the proposal approval process. Thus, the purpose of the CPs are intended to generate country-	Low	The Secretariat published Country Programme Guidance in January 2021. The guidance further clarified the CPs' different components. Notably, the guidance encourages countries to align with the GCF's strategic plan and related sector advice for a given programming cycle. The IEU notes that the



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	address critical questions concerning the goal of accreditation and direct access (beyond process) as identified through this evaluation. These include whether accreditation is	guidelines, a flexible approach to CPs and the parallel processing of CNs and FPs while countries were still in the process of developing their CPs have not adequately served this purpose. To address this, the Secretariat has developed programming and operations manuals to clarify and reinforce the role of CPs in the project cycle and has also developed further		document provides limited guidance on how to approach nominations for direct access strategically.  The Secretariat has also clarified the process in two publications: (i) the GCF Operations Manual, published internally in August 2020 and revised in October 2020, and (ii) the GCF Programming Manual, published in July 2020.  In the USP's 2020-23 strategic objective for strengthening country ownership programmes (decision B.27/06, annex I, para.13b), the Board says it will aim for geographical balance and equitable funding across mitigation and adaptation when determining funding allocation parameters and guidelines for the GCF-1 period. The plan does not consider the scale of resources programmed by country.  The draft PCN on CO also recommends that IAEs increasingly partner with DAEs for proposal development, capacity building and implementation management. Such partnerships will benefit IAEs and DAEs by taking advantage of their expertise and experience. However, the PCN is still under review.



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	strategies should drive the decision on the type and number of entities nominated. More clarity from the GCF on resource availability and priority focus	driven by the Strategic Plan when adopted by the Board. In this context, the Board may also consider the scale of resources to be programmed by each country or groups of countries as may be appropriate.		