



GREEN
CLIMATE
FUND

GCF/B.28/08/Add.01

23 February 2021

Written feedback received on draft
document titled “Further development
of the simplified approval process ”

I. Reference table

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1. The feedback received from the Board on the document is reproduced in the following sections. For ease of reference and where helpful, the relevant feedback received from the Board members for the document may be highlighted.

1.1 Written feedback received from Il Young Park

E-mail received on 4 February

From: Il Young Park
Sent: Thursday, February 4, 2021 5:43 PM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: Ji Young Choi; Eunkyul Park; Yeongsoo Kim; Ye Eun Kim
Subject: Comment for the document "Further Development of the Simplified Approval Process" _Board Member_ Republic of Korea

Dear Secretary to the Board,

As a Board Member to the GCF, I hereby submit my comment on the document, "Further development of the Simplified Approval Process" circulated to the Board.

Comments:

- We welcome this document on the further development of the simplified approval process, which should shorten the approval period and enhance the accessibility of SAP projects.
- We would like to understand the specifics (including the contents and the timeline) of the 'ADDITIONAL SIMPLIFIED ASSESSMENT METHODOLOGIES AND A MORE EFFICIENT REVIEW PROCESS FOR SAP PROPOSALS' mentioned in Annex I (d), as this may directly affect the AEs' implementation of projects.
- We would also like to know how the Secretariat plans to further incorporate what was recommended by the IEU in its independent assessment of SAP Pilot Scheme (a strategy to expand the scope of the SAP modality to include proposals that bring value to the GCF).

Thank you.

Best regards,
Il Young Park

1.2 Written feedback received from Marta Mulas Alcantara and Niamh McGuire (through Alison Carlin)

E-mail received on 5 February

From: CARLIN, Alison (DST)
Sent: Friday, February 5, 2021 4:17 PM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: Mulas Alcántara, Marta; Presmanes Andrés, María; Niamh McGuire; Paul Ryan; Martin Lally; Susana Castro-Acuna; Green Climate Fund - Secretariat
Subject: RE: [Gentle Reminder] Documents for Board consultation – Further development of the simplified approval process and Revised Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment

[UNCLASSIFIED]

Hello GCF colleagues

On behalf of the Spain/Ireland/New Zealand constituency I would like to share the following thoughts on the SAP:

In general we welcome and support the draft policy. We are pleased to see the potentially significant time savings in the review and approval times for SAP proposals that could be achieved through rolling assessments by TAP, approvals between board meetings and delegation to the ED - all of which we support.

We are also comfortable with the extension of eligibility to projects that have limited environmental and social impact (beyond those that have "minimal to none") although of course it remains important to ensure the appropriate assessments are carried out.

There are a couple of issues that we wished to raise:

1. For proposals that are considered and approved by the Board between Board meetings it will be important to ensure Active Observers / CSO voices are able to be heard. We would want to be sure that their participation was not disadvantaged by this approach. We often find the comments by AOs are very useful as they are able to reach in to communities affected by proposals. It will be even more important that CSOs have a voice in this process given the proposal to extend eligibility of SAPs to those with "limited" environmental and social impact. It is not clear (in the Annex), when the AOs would have access to the SAP proposals for their comment and how we would be able to have access to their views.
2. While we welcome the improved review and approvals processes and acknowledge that these improvements will be helpful in condensing the amount of time it takes from concept to approval, the draft updated Policy does not attend much to the arguably more difficult challenges of project preparation and the amount of information and documentation required (para 12 addresses this to some degree for mitigation and private sector projects but not more broadly or comprehensively). Given that the review found that this remains one of the most burdensome

aspects of the SAP and that all stakeholders interviewed commented on the need to simplify this aspect of the process, we would encourage further assessment of ways to reduce the burden of documentation without reducing the quality of proposals. If not, SAPs will remain too burdensome for the amount of funding being sought regardless of improvements to the approvals process.

We note that it may be the case that the level of technical assistance provided needs to be reviewed and also note that document mentions that the AE and NDA would be supported by Readiness and PPF to help with this project preparation process. But we think it is still useful also to review the documentation required so that LDCs and SIDS in particular can access funding without this level of complexity and need for support.

3. From a budgeting perspective, having 6 SAP approval moments per year (3 in BM and 3 BBM) will require more SEC and TAP human resources which in turn will have an impact on the coming Budgets, as the document points out. Could we just confirm that the GCF will look to externalise its review service to service the increasing frequency of reviews?

Again, thank you for the opportunity to comment and the efforts the Secretariat put into preparing the paper.

Warm regards

Ali Carlin (she/her)

1.3 Written feedback received from Jean-Christophe Donnellier and Stephane Cieniewski (through Antoine Alamowitch)

E-mail received on 5 February

From: ALAMOWITCH Antoine
Sent: Friday, February 5, 2021 5:49 PM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: CIENIEWSKI Stéphane; DONNELLIER Jean-Christophe; BIVAS Aurore; LEGRAND Catherine; Green Climate Fund - Secretariat
Subject: RE: Message to the Board – Consultations in 2021 - SAP comments FRANCE

Dear Madam, Dear Sir,

Let me first of all thank you for this document. The SAP is an essential part of the fund's architecture and we are committed to make progress on that topic as early as B.28.

We are pleased to see that your proposal takes into account and is based on the two assessments made of the SAP and in particular the one made by the IEU.

We support your proposal to delegate the approbation of SAP projects to the Executive Director for projects & programme that presents no to minimal environmental and social impacts and risks and the introduction of in-Between Board Meeting (BBM) approvals by the Board for SAP projects, programmes that entail limited environmental and social impacts and risks.

As we consider this topic important, we would welcome if needed a call with the Secretariat and other willing board member to exchange ideas on this topic.

Thank you,
Regards,

Antoine ALAMOWITCH

1.4 Written feedback received from the African Board and alternate members (through Richard Sherman)

E-mail received on 5 February

From: richard sherman
Sent: Friday, February 5, 2021 6:22 PM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: Africa GCF-Board; Green Climate Fund - Secretariat
Subject: African members comments on SAP

Dear Secretariat

Please find attached the comments from the African Board and Alternate Members on the SAP document.

Best regards

Richard

Contents of attachment to e-mail

Comments were received via an attachment and are reproduced in annex I of this document.

1.5 Written feedback received from Josceline Wheatley

E-mail received on 5 February

From: Josceline Wheatley
Sent: Friday, February 5, 2021 7:58 PM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: Kevin Gardner; Riera, Eliette; Green Climate Fund - Secretariat
Subject: RE: Documents for Board consultation – Further development of the simplified approval process

OFFICIAL

Dear Carolina,

UK comments on the 'Further development of the SAP'

We fully support efforts aimed at enhancing countries' access to GCF and in this context we welcome the work undertaken to identify options for further development of the SAP. We are grateful for the opportunity to comment, as follows:

- We support the idea of (i) rolling reviews of SAP proposals; (ii) using BBMs to approve SAP proposals; and (iii) expanding SAP eligibility to projects with limited risk;
- We also support the idea of delegating authority to the Executive Director where appropriate to promote efficiency gains. We would like to make sure we understand how sighted the Board would be on SAP proposals going to the ED for approval, per the proposal in the document. Section 6.1b in Table 1 of the document states that "...the Executive Director takes a decision within 21 calendar days after the publication of the SAP funding proposal" to either approve a proposal (potentially with conditions) or refer it to the Board. Could the secretariat please confirm that this 21 day publication period would give Board Members the opportunity to review and comment on a SAP proposal should they so wish?
- Whilst welcoming the efforts made to identify options to speed up SAP approvals, we note (eg. para 11b) that stakeholders perceive the overall amount of information needed for SAP proposals is still similar to that needed for FPs in the 'normal' project approval process. Could the secretariat please confirm that options were explored to address this, and that the amount of information required for SAP proposals is appropriate within GCF's existing risk appetite?

Regards,

Jos

1.6 Written feedback received from Hans Olav Ibrek and Terje Kronen

E-mail received on 5 February

From: Kronen Terje
Sent: Friday, February 5, 2021 9:07 PM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: Ibrek Hans Olav; Camacho Mejia, Monica Judith; Evjen Anne Smeby
Subject: SV: [Gentle Reminder] Documents for Board consultation – Further development of the simplified approval process and Revised Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment

GCF Secretariat,

Thank you for the opportunity to comment on the two documents.

We believe the discussions at the Board meeting will be most important, and we have no comments at this stage to the revised Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment.

However, on behalf of the Norwegian Board member we have some initial comments to the further development of the simplified approval process:

First of all, we strongly support the proposal in terms of making the approval process more efficient. If the proposal is approved, it will significantly reduce the number of days for review of SAP-projects. We see it as very positive, considering that the IEU independent assessment has found that SAP review process was only 8-15% faster than the PAP process. We also like rolling review of projects.

However, we have some concerns:

- Based on our experience with SAP 003 UNEP, we would like to highlight the need to put sufficient weight on the investment criteria "Impact potential", in particular the climate rationale. Under "Excluded activities under the simplified approval process" you may consider to include activities with no substantial climate impact. After all, the GCF is a climate fund.
- We welcome that the list with "risk factors" includes activities that can affect the rights of indigenous peoples and local communities.
- We also welcome the recognition of indigenous peoples, free, prior and informed consent.
- The Secretariat should explain in the proposal who, in the window of 21 days, will be able to send comments to the ED.
- The role of BM, if any at all, should be clarified for the modality «Delegation of approval authority to the ED for certain SAP proposals»

We look forward to the discussions in the Board meeting.

Best regards,

Terje Kronen

Alternate Board Member

1.7 Written feedback received from Tobias von Platen-Hallermund and Jock Geselschap (through Tanne Nørgaard Jensen)

E-mail received on 5 February

From: Tanne Nørgaard Jensen
Sent: Friday, February 5, 2021 10:53 PM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: Tobias von Platen-Hallermund; Zeijst, Vincent-van; Peter Carter; Jimmy Skenderovic; Lennart Duschinger; Alyssa Di Cara; Jennifer De Nijs
Subject: SV: Documents for Board consultation – Further development of the simplified approval process

Dear Carolina

We would like to submit the following comments in regard to *the further development of the simplified approval process*:

Thank you very much for preparing and sharing this document to help improve the SAP.

In order to ensure that the SAP becomes simpler, quicker and less burdensome, we would like to request that further options are explored to reduce the burden of document preparation in the application process. We note that “if all submission and review requirements (including the GCF investment criteria) continue to largely apply to SAP proposals, there are limits to the amount of further simplification that can be accomplished as regards the preparation and review of SAP proposals” (page 3). Would the Secretariat be able to provide suggestions of how to further limit the document submission requirements that apply to SAP proposals compared to PAP proposals?

In terms of Board approval, we strongly support rolling reviews by the Secretariat of SAP Proposals and related contingencies and introducing BBM approval of SAP Proposals and related contingencies.

On the other hand, the suggested solutions on 1) delegation of approval authority to the ED for certain SAP proposals and 2) expansion of SAP eligibility to projects and programmes whose environmental and social risks are “limited” may be considered once more experience is gained of the SAP.

Overall, we are happy to learn that the SAP Pilot has attracted a higher number of DAEs and adaptation projects and that 80% of SAP projects are in LDCs, SIDS and/or in Africa.

Thank you. On behalf of NL/DK/LUX,

Best

Tanne Nørgaard Jensen

1.8 Written feedback received from Lars Roth

E-mail received on 5 February

From: Lars Roth

Sent: Friday, February 5, 2021 11:45 PM

To: Green Climate Fund - SECRETARY TO THE BOARD

Cc: Anders Nyström; Christopher zink; jan warnback; jorgen pettersson

Subject: Sv: Documents for Board consultation – Further development of the simplified approval process

Dear Secretariat

Many thanks for your important work on the further development of the SAP. We are ready to adopt the documents as it stands.

With kind regards

Lars

1.9 Written feedback received from Heike Henn and Susan Krohn (through Sebastian Forsch)

E-mail received on 6 February

From: Forsch, Sebastian
Sent: Saturday, February 6, 2021 1:08 AM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: Henn, Heike; 'Krohn, Susan'; Zügel, Sarah; Stumpf, Simon; Green Climate Fund - Secretariat
Subject: AW: AW: Documents for Board consultation – Further development of the simplified approval process

Dear Carolina and Colleagues,

On behalf of Heike, please find attached our comments on the Further development of the simplified approval process.

Best regards,

Sebastian

Sebastian Forsch

Contents of attachment to e-mail

Comments were received via an attachment and are reproduced in annex II of this document.

1.10 Written feedback received from Gisella Berardi

E-mail received on 6 February

From: Berardi Gisella
Sent: Saturday, February 6, 2021 3:17 AM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: Sebastiani Vittorio; Mannoni Federico; Mei Eleonora; Green Climate Fund - Secretariat
Subject: I: Documents for Board consultation – Further development of the simplified approval process

Dear Carolina,

please find attached Italian comments to SAP.

Best,
Gisella

Gisella Berardi

Contents of attachments to e-mail

Comments were received via two attachments and are reproduced in annexes III and IV of this document.

1.11 Written feedback received from Mathew Haarsager and Trigg Talley (through Jeanny Chong)

E-mail received on 6 February

From: Jeanny Chong
Sent: Saturday, February 6, 2021 9:59 AM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: Elizabeth Lien; Nicholas Strychacz; Clifford, Hilary; Anne Kolker; Nicholas Haeg; Green Climate Fund - Secretariat
Subject: RE: Documents for Board consultation – Further development of the simplified approval process

Dear Carolina,

Please find attached some comments on the SAP. We would be happy to have a call if it would be easier to discuss.

Thank you,
Jeanny

Contents of attachment to e-mail

Comments were received via an attachment and are reproduced in annex V of this document.

1.12 Written feedback received from Masahiro Takasugi and Yoshitomo Kondo (through Tsutomu Itsumi)

E-mail received on 9 February

From: ITSUMI TSUTOMU
Sent: Tuesday, February 9, 2021 3:51 PM
To: Green Climate Fund - SECRETARY TO THE BOARD
Cc: TAKASUGI MASAHIRO; '近藤嘉智(Yoshitomo KONDO)'; SUGIO TORU; 'Taniguchi, Kotaro[谷口 光太郎]'; Green Climate Fund - Secretariat
Subject: RE: Consultation on SAP document

Dear Crystal and colleagues,

This is Tsutomu Itsumi with the foreign ministry of Japan.
As I notified yesterday, we finalized our comments on the SAP document.
Please find the attached comments. Your kind acceptance would be appreciated.

Thank you for your work as always.

Best regards,
Tsutomu Itsumi

Contents of attachment to e-mail

Comments were received via an attachment and are reproduced in annex VI of this document.

Annex I: Written feedback received from the African Board and alternate members

Comments are reproduced below.

Annex II: Written feedback received from Heike Henn and Susan Krohn

Comments are reproduced below.

Annex III: Written feedback received from from Gisella Berardi (first attachment)

Comments are reproduced below.

Annex IV: Written feedback received from Gisella Berardi (second attachment)

Comments are reproduced below.

Annex V: Written feedback received from Mathew Haarsager and Trigg Talley

Comments are reproduced below.

Annex VI: Written feedback received from Masahiro Takasugi and Yoshitomo Kondo

Comments are reproduced below.