



**GREEN
CLIMATE
FUND**

Meeting of the Board
17 – 20 October 2022
Incheon, Republic of Korea
Provisional agenda item 14

GCF/B.34/09/Add.07

26 September 2022

Consideration of accreditation proposals – Addendum VII

Re-accreditation assessment of RAPL049

Summary

This document contains the re-accreditation assessment conducted by the Secretariat and the Accreditation Panel in accordance with decision B.24/13, and the recommendation by the Accreditation Panel for re-accreditation of re-accreditation applicant 049 (RAPL049), World Wildlife Fund, Inc. (WWF-US), based in the United States of America, for the second accreditation term.

I. Introduction

1. World Wildlife Fund, Inc. (WWF-US) is an international non-governmental organization (NGO) headquartered in the United States of America. WWF as a network is present in 100 countries across Asia Pacific, Africa, Latin America and Caribbean, and Europe, aiming to reduce threats to biodiversity and conserve nature. It leverages its established relations at the local, national and global levels, such as national governments, private and public sector entities, indigenous communities and civil societies. As an accredited entity (AE) of GCF, WWF-US strives to deliver innovative and science-based solutions to preserve biodiversity, prevent environmental degradation, and ensure low-emission sustainable development pathways. WWF-US intends to contribute to GCF objectives by focusing on key ecosystems and landscapes capable of bringing mitigation and adaptation benefits and proposing models for restoring and preserving ecosystems.

2. WWF-US was accredited by the Board on 14 December 2016 in decision B.15/09, paragraph (d), for the following parameters, as recommended by the Accreditation Panel (AP), under the fit-for-purpose approach of the GCF:

- (a) **Access modality:** international access;
- (b) **Track:** fast-track under the Global Environment Facility (GEF);
- (c) **Maximum size of an individual project or activity within a programme:** medium;¹
- (d) **Fiduciary functions:**²
 - (i) Basic fiduciary standards;
 - (ii) Specialized fiduciary standard for project management; and
 - (iii) Specialized fiduciary standard for grant award and/or funding allocation mechanisms; and
- (e) **Maximum environmental and social risk category:** medium risk (category B/intermediation 2 (I-2));³ and
- (f) **Indicative results areas for intended projects/programmes with GCF:**
 - (i) Energy generation and access;
 - (ii) Transport;
 - (iii) Forests and land use;
 - (iv) Health, food, and water security;
 - (v) Livelihoods of people and communities;
 - (vi) Ecosystem and ecosystem services; and
 - (vii) Public, private and cross-cutting types of projects/programmes.

¹ As per annex I to decision B.08/02 (annex I to document GCF/B.08/45), “medium” is defined as “maximum total projected costs at the time of application, irrespective of the portion that is funded by the GCF, of above USD 50 million and up to and including USD 250 million for an individual project or an activity within a programme.”

² Decision B.07/02.

³ As per annex I to decision B.07/02 category B is defined as “Activities with potential mild adverse environmental and/or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures,” and intermediation 2 is defined as “When an intermediary’s existing or proposed portfolio includes, or is expected to include, substantial financial exposure to activities with potential limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures; or includes a very limited number of activities with potential significant adverse environmental and/or social risks and/or impacts that are diverse, irreversible, or unprecedented.”

3. WWF-US signed its accreditation master agreement (AMA) with GCF on 16 November 2017, which became effective on 13 December 2017. With the AMA coming into effect, the first accreditation term of the AE is from 13 December 2017 to 12 December 2022. The AE submitted its application for re-accreditation to GCF via the digital accreditation platform on 15 March 2022. Accreditation fees were not applicable since the AE is seeking re-accreditation for the same accreditation scope for which it was previously accredited; thus, the Stage I institutional assessment and completeness check commenced upon submission of the re-accreditation application. Stage I was completed on 30 June 2022 and the applicant was progressed to the Stage II (Step 1) accreditation review by the AP, which has been concluded with the publication of this assessment.

4. The AE has applied for the same accreditation scope for which it was previously accredited, and has updated the indicative results areas for intended projects/programmes it seeks to submit to GCF as follows:

- (a) **Indicative results areas for intended projects/programmes with GCF:**
- (i) Forestry and land use;
 - (ii) Health, well-being, food and water security;
 - (iii) Most vulnerable people and communities;
 - (iv) Ecosystems and ecosystem services; and
 - (v) Public, private and public-private cross-cutting types of projects/programmes.

II. Stage I institutional assessment and completeness check

5. The AE is eligible for, and applied under, the fast-track re-accreditation process as a GEF entity. Its application has been assessed by the Secretariat during Stage I in accordance with the requirements and gaps identified in decision B.08/03 in accordance with GCF policies and standards to the extent applicable to accreditation:

- (a) “Updated Strategic Plan for the Green Climate Fund: 2020–2023” (decision B.27/06);
- (b) “Matters related to the accreditation framework” regarding the re-accreditation process (decisions B.24/13 and B.26/01);
- (c) “Guiding Framework and Procedures for Accrediting National, Regional and International Implementing Entities and Intermediaries, Including the Fund’s Fiduciary Principles and Standards and Environmental and Social Safeguards” (decision B.07/02);
- (d) “Guidelines for the Operationalization of the Fit-for-purpose Accreditation Approach” (decision B.08/02);
- (e) “Policy on Prohibited Practices” (decision B.22/19);
- (f) “Anti-Money Laundering and Countering the Financing of Terrorism Policy” (AML/CFT Policy) (decision B.18/10);
- (g) “Policy on the Protection of Whistleblowers and Witnesses” (decision B.BM-2018/21);
- (h) “Environmental and Social Management System: Environmental and Social Policy” (decision B.19/10);
- (i) “Revised Environmental and Social Policy” (decision B.BM-2021/18);
- (j) “Comprehensive Information Disclosure Policy of the Fund” (decision B.12/35) regarding the disclosure of environmental and social (E&S) information;
- (k) “Updated Gender Policy and Gender Action Plan 2020–2023” (decision B.24/12); and

- (i) “Evaluation Policy” (decision B.BM 2021/07).

2.1 Legal status, registration, permits and licences

6. WWF-US provided documents on its establishment and licences to operate, where relevant, as a part of the application. The AE confirmed that there had been no change in its legal status or licences to operate since the original accreditation application.

7. As indicated in paragraph 3 above, the AE and GCF entered into the AMA for the AE’s first accreditation term from 13 December 2017 (date of AMA effectiveness) to 12 December August 2022.

8. If the Board approves the AE’s re-accreditation, GCF and the AE will amend and restate the AMA. The amended and restated AMA will set out the terms and conditions of the re-accreditation, including but not limited to: (i) the scope of the AE’s re-accreditation; (ii) any conditions of re-accreditation based on the AP assessment of the AE against the GCF standards and policies listed in paragraph 35 below; and (iii) reflection of the GCF policies and standards adopted by the Board in effect as of the date of the amended and restated AMA.

9. The AE confirmed at the time of publication of this recommendation that it is willing to engage with GCF on negotiating the amended and restated AMA and that it will provide the necessary resources to review the draft amended and restated AMA.

2.2 Accredited entity performance in contributing to GCF programming results

2.2.1 **Approved GCF projects under implementation and national designated authority participatory monitoring**

10. Project FP050, Bhutan for Life (BFL), is the AE’s only ongoing funded activity. Bhutan for Life aims to support improved management of the country’s protected areas (PAs), providing time and resources for the government of Bhutan to secure long-term revenues to maintain the improvements. BFL provides a one-time 14-year bridge financing that will fill the current annual resource gap of USD 3.6 million and move Bhutan’s PAs to a higher level of management and delivery. GCF proceeds and other donor financing will be used while the country gradually increases its own financing and management resources, so that by year 14, the country will be able to fully finance the sustainable management of its protected areas system. Each year funds will be allocated to cover the annual gap between the government’s allocations and the costs of improving management of PAs as regards greenhouse gas mitigation, enhanced climate resilience, and other sustainability benefits. The Government of Bhutan will increase the annual expenditures, in part by creating new funding sources, with the government of Bhutan assuming full financial responsibility for the management of the protected areas system at the end of the project period.

11. The primary BFL short-term outcome is to enable Bhutan to immediately begin upgrading the management of natural resources in half of its territory, explicitly accounting for the impacts of climate change to enhance resilience for communities and ecosystems, while also maintaining carbon sinks and sequestration. For the long-term impact, BFL aims to develop Bhutan’s human and budgetary resources so the country can fully take on, unaided, the task of sustainably managing its PA system to meet greenhouse gas mitigation goals and build climate resilience to benefit people and nature. Activities under the programme will increase climate change mitigation practices in forestry and land use, support ecosystem-based adaptation to improve natural resource management, livelihoods, climate-smart conservation, sustainable management of the PAs and enhance biodiversity.

12. BFL expects to mitigate 35.1 MtCO₂eq over 14-year lifespan of the project. Additionally, 51 per cent of Bhutan's territory will be sustainably managed; 1.2 million hectares of forests in the PAs will be permanently preserved (sequestering 206.2 MtCO₂eq); ecosystem service flows will be indirectly improved to as many as 400,000 people (53 per cent of the country's population) living in rural areas downstream of PAs; and watershed conditions in 10 critical catchments with the PA network will be improved.

13. **Project implementation progress:** funded activity FP050 for BFL is cross-cutting in nature, was signed on 11 June 2018, and became effective on 5 October 2018. Total GCF financing is USD 26.58 million in grants of which USD 5.792.037 has been disbursed as of 1 February 2019, with the next disbursement request from the AE expected in 2022 since the project operates on a biannual disbursement schedule, also accounting for delays due to the COVID-19 pandemic. The project has five components:

- (a) Component A: Increasing forestry and land use climate mitigation practices;
- (b) Component B: Integrated adaptation in communities and ecosystems to improve natural resource management for livelihoods and climate resilience;
- (c) Component C: Climate-smart conservation to enhance provision of ecosystem services;
- (d) Component D: Sustainable management of protected areas; and
- (e) Component E: This component groups two major activities and a contingency fund as follows: (a) all the activities and costs related to the implementation of the BFL Environmental and Social Management Plan and implementation of the Gender Mainstreaming Action Plan; (b) activities related to all the institutional arrangements and effective implementation of BFL including, inter alia, establishing and operating the BFL Project Coordination Unit (PCU) in the executing entity (EE), the Ministry of Agriculture and Forests, as well as establishing and operating the Transition Fund. Other activities under project management include communication, consultation and transparency activities, as well as the due diligence, monitoring, reporting and evaluation activities required by the BFL programme of work; and (c) a contingency fund to address unforeseen programmatic or financial challenges (change in exchange rates and inflation rates) of all the components during project implementation.

14. The annual performance reports (APRs) for 2020 and 2021 provide detailed information on key milestones in the project. Out of 16 key deliverables and milestones expected from the project, those that demonstrate sufficient progress are:

- (a) A total of 7.5 million tons of carbon equivalent has been sequestered in three years with no net loss in area of 51.4 per cent of the total land area maintained under the protected area network. This has achieved 21.4 per cent of the total target of sequestering 35.1 million tons of carbon equivalent expected by the end of year 14 of the project period. A total of 220 hectares of land have been brought under sustainable land management and bioengineering activities with financial support from the Royal Government of Bhutan and the Global Environment Facility-United Nations Development Programme.
- (b) A total of 1561 hectares of land (year 3) has been brought under climate-smart restoration achieving 52.05 per cent of the total target of bringing 3,000 hectares of land under climate-smart restoration at the end of the project period. Also, a total of 245.82 hectares of plantation sites were maintained and 6 nurseries have been developed.
- (c) A total of 33 households have been provided with alternative energy technologies consisting of solar and biogas thereby benefiting almost 5 per cent of a total 750 households (10 per cent of the 7,500 households living within the protected area network).

- (d) In terms of adaptation impacts, a total of 2,367 community members have been trained in environmental conservation and waste management activities. This has cumulated to training over 100 per cent of the population (7,500 out of 7,500) living within the PAs within three years.
- (e) Of the project goal to implement 30 nature-based local enterprises in PAs/biological corridors, three electric drying machines for the incense manufacturing units were provided in 2021 which has helped to produce good quality incense in a smoke-free working environment.

15. **Reporting:** reporting by the AE under funded activities is generally timely and, overall, the AE is timely in the submission of key reports and in seeking guidance and clarifications as relates to reporting obligations and other project management issues. The overall quality of reporting is above average with detail and clarity of information in the submitted documents.

2.2.2. **Officially submitted entity work programme, concept notes, funding proposals and Project Preparation Facility requests**

16. **Entity work programme:** the AE submitted a draft entity work programme (EWP) for the first replenishment period of GCF (GCF-1) on 18 February 2020. The EWP was taken through multiple rounds of interdivisional review by the Secretariat and iterations by the AE before it was endorsed by the Climate Investment Committee-1 (CIC-1) on 17 June 2020, with recommendations on the partnership and overall pipeline to be considered at the midway point of GCF-1 and on the specific project ideas to be considered when developing those into concept notes and funding proposals.

17. The AE's comparative advantage is its continuous presence (through its network) in 100 countries, in 60 of those sharing with GCF, and having a diverse network of partners at various levels such as governments, private sector, indigenous peoples, and civil society at local, national and global levels. The AE's ability to design and implement innovative nature-based solutions to climate change adaptation, combined with the broad geographical coverage, gives WWF-US another comparative advantage which is its ability to scale up and replicate new models and approaches in more countries and regions.

18. The EWP endorsed by CIC-1 contained two project ideas covering countries in Latin America and the Pacific. The Earth for Life programme included two officially submitted concept notes for Colombia and Peru respectively, and envisioned development of similar project ideas for other countries. The other project idea, Fiji Great Sea Reef Resilience, has now been developed into a concept note and submitted to the Secretariat. WWF-US is yet to provide an updated EWP reflecting the evolution of its pipeline and forecast for the remainder of the GCF-1 period and in preparation for GCF-2.

19. **Concept notes/funding proposals:** as of August 2022, the AE has a pipeline of four public sector proposals. The two most advanced proposals, both undergoing interdivisional review, are located in Latin America (Peru and Colombia, mentioned above) with combined GCF finance of USD 90 million. The two remaining proposals, located in Asia and the Pacific (Fiji and Pakistan), are at the concept note stage, with one (Pakistan) having an approved Project Preparation Facility and the other (Fiji) a pending concept note endorsement by CIC-2 and Project Preparation Facility request. Together, these four proposals amount to USD 174.5 million in GCF finance.

20. Compared to the pipelines of other large international access AEs addressing the GCF results areas on forests and land use and ecosystems and ecosystem services, the AE's pipeline remains nimble, with mostly (though not systematically) high-quality proposals upon entry. The AE tends to respond swiftly and effectively to GCF comments, although some exceptions are noted, particularly BFL. In addition, after a period of dormancy during the interdivisional review, WWF-US resubmitted a revised version of the Peru proposal in June 2022. Overall,

WWF-US could enhance the scope and ambition of their pipeline by considering a global programme, including on the Project Finance for Permanence approach implemented in FP050 (Bhutan) and under consideration in their proposals in Colombia and Peru. WWF-US is also in discussion with GCF on a regional or global grasslands programme following the Global Partnership announced at the fifteenth session of the Conference of the Parties to the United Nations Convention to Combat Desertification. WWF-US, however, has conveyed reservations about investing in the development of a multi-country programme in the absence of a Board-approved policy on programmatic approaches.

2.2.3. Risk flags incurred by the projects, AE or country during the current accreditation term

21. Key operational risks in FP050 include the following:
- (a) While Bhutan's global environmental commitment and leadership are well recognized and the government has shown strong ownership, the BFL project struggles to effectively execute project activities due to non-centralized planning and interinstitutional coordination for well-sequenced and timely delivery. The BFL funding proposal included multiple aspects of project design to continue during execution. However, as the funding proposal defines the high-level outcomes and adaptation and mitigation impacts, centralized planning is required to maintain project coherence and achieve the goals stated for the project. The project currently requires centralized, long-view planning and the project steering committee would require additional support.
 - (b) Annual planning continues to be a challenge due to weak capacity of EEs and the implementing agencies in the country. The compilation and review steps between the EEs are lengthy and cumbersome. Aside this, the lack of environmental and social safeguards (ESS) capacity has led to continued delays in completing the environmental and social management plans (ESMPs) for approval by WWF-US, which compounded delays in implementing partners accessing funds.
22. In addition, the COVID-19 pandemic has seriously impacted WWF-US operations in Bhutan and severely hindered travel and in-person events for all the projects. Starting in 2020, the Royal Government of Bhutan had put several measures in place to suppress the spread of disease, including restrictions on domestic travel, restrictions on in-person gatherings, and complete lockdowns when community transmission has been detected. International travel was not permitted and as such, since 2020 WWF-US has been unable to travel to Bhutan for the project's annual supervision missions.
23. With regard to concentration risk, there are no risk flags. While there are no risk tolerance levels approved by the Board, the Secretariat monitors concentration levels by single AE, which is currently 0.2 per cent for WWF-US. The portfolio concentration risk by single funding proposal is within the tolerance level approved by the Board.
24. Regarding the AE's first-level due diligence of funding proposals reviewed through the Project Review and Tracking Platform, ESS and gender reviews identified issues that the AE is required to address, however these were not fatal flaws. No significant ESS and gender issues have been identified in APRs of the funded activity under implementation.
25. Specifically on risk related to the GCF "Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Policy" and "Policy on Prohibited Practices", the Secretariat has not noted any concerns pertaining to the AE's portfolio, particularly in the review of funding proposals and concept notes submitted during the current accreditation term. Furthermore, the Secretariat consulted with the Independent Integrity Unit (IIU) regarding any reports of prohibited practices within its knowledge; the IIU confirmed that it had not received

any reports of integrity violations and therefore did not have any reservations with this re-accreditation proposal being presented to the Board for consideration.

2.3 Accredited entity-level reporting on continuing to meet GCF accreditation standards

26. In line with the AMA clause 15.02(c)(i) and 5.03(b)(iv), WWF-US has submitted the required AE-level reports throughout its five-year accreditation term within the deadlines stipulated in the AMA, except for the calendar year 2017 when the report was provided after the deadline. These include annual self-assessments for calendar years 2017 and 2018, followed by a midterm accreditation review that included the self-assessment for calendar year 2019, and another self-assessment for calendar year 2020. WWF-US's re-accreditation application includes the self-assessment for calendar year 2021.

27. In the annual self-assessments, WWF-US reported minor changes including amendments to its Standards on Community Health, Safety, and Security; updates to its Standards on Access Restriction and Resettlement; and updated guidance on Gender-Based Violence and Labor.

28. As detailed in document GCF/B.27/03/Add.02, the AP and Secretariat reviewed the midterm review report covering calendar year 2019. The AE did not report any changes. However, the AE has previously communicated to GCF that its network's Independent Review Panel is in the process of investigating allegations raised in 2019 concerning the lack of respect for human rights by some government-employed rangers associated with some of its non-GCF-funded projects. The AE indicated that it would update GCF when the panel report is released. The AP recommends that the AE and GCF continue to closely monitor the resolution of this complaint through the existing reporting mechanisms, as it relates to implementation of the institutional environmental and social management system. Overall, it was concluded by the AP that the AE continued to meet the relevant GCF accreditation standards and obligations as an AE per its AMA with GCF in the context of its accreditation scope, noting the recommendations above.

2.4 International access entity contribution to building the capacity of direct access entities

29. In line with the AMA clause 15.02(c)(ii), the AE has reported on an annual basis from 2017 to 2021 on various types of support it has provided to the GCF direct access entities (DAEs) as well as potential local, national and regional-level entities for accreditation. Given that the AE is a not-for-profit organization (US registered 501(c)(3)) and NGO, capacity building of partners is integrated into its mission-related projects and programmes; but it does not have a specific mandate dedicated to capacity building, nor does restricted philanthropic funding allow for these activities outside of its mission-related work. In this context, the AE has provided information in its reports on primarily supporting DAEs through building their track record and gaining experience in applying GCF standards through participation in GCF projects/programmes, including through strengthening the entities' systems to undertake the executing entity (EE) role. The reports submitted by WWF-US indicate that the AE has provided

support to four accredited DAEs in Latin America and Asia Pacific, engaging three of them as partners/executing entities.⁴

30. WWF-US indicated in its re-accreditation application received on 15 March 2022 that WWF-US would give high priority to supporting the capacity-building of developing country institutions so that they can successfully plan and manage their climate change investments and become accredited to GCF within its mission as a conservation not-for-profit organization. More specifically, WWF-US will work with local entities and stakeholders, who may be seeking accreditation to GCF or to work as intermediaries, by sharing its experience of accreditation and offering advice, by providing training/coaching on gender and social inclusion necessary for GCF accreditation, and by implementing projects with local entities and using these projects as an opportunity to build their track record and experience with standards (including fiduciary and safeguards) to better meet GCF requirements.

2.5 Overall portfolio of activities of the accredited entity beyond those funded by GCF

31. As per the updated Strategic Plan for GCF: 2020–2023, the re-accreditation process, and the monitoring and accountability framework, the Secretariat and the AP are requested to provide an assessment of the extent to which the overall portfolio of activities of the AE beyond those funded by GCF has evolved during the accreditation period, in order to advance the goal of GCF to promote the paradigm shift towards low-emission and climate-resilient development pathways in the context of sustainable development. Such an assessment is to be conducted primarily by the AP during Stage II (Step 1) if Stage I is completed, however information on the AE's commitments and strategies related to climate change are below.

32. Since 2015, WWF-US identified climate and energy as one of its six major results areas along with food, forests, freshwater, oceans, and wildlife. To achieve the goals in those results areas, the AE intends to assist developing countries in transitioning to clean energy sources, ensure the inclusion of ecosystem-based approaches to national development plans, and reduce deforestation and degradation.

33. The AP reviewed the following information provided by the AE with regard to guiding questions established in the GCF "Methodology for establishing a baseline of greenhouse gas emissions and climate resilience for the portfolio of accredited entities":⁵

- (a) **Guiding question 1:** Has the entity established policies or commitments in the short, medium, or long-term regarding investment in climate projects?
- (i) Although the organization has engaged in climate change work for nearly two decades, since 2015 climate has been one of six major results areas (called "Goals") at WWF-US, along with food, forests, freshwater, oceans and wildlife. Between 2016–2020, WWF-US operated under its five-year strategy (see WWF-

⁴ The DAEs are as follows: Peruvian Trust Fund for National Parks and Protected Areas (PROFONANPE) is an EE for the potential project, "Peru's Natural Legacy – Amazon Climate (PdP A&C): Effective Management of the Peruvian Amazon Protected Areas for Climate Change Mitigation and Adaptation", which is in WWF-US's submitted pipeline to GCF. Fiji Development Bank (FDB) as a potential EE for the WWF-US funding proposal "Fiji Coral Reef Rescue Initiative", for which the executing partnership will be finalized with FDB during funding proposal development. Bhutan Trust Fund for Environmental Conservation (BTSEC) as a co-financier to the GCF Funded Activity "Bhutan for Life Project" (FP050). In February 2020, BTSEC participated in WWF-US's Supervision Mission high-level dialogue. WWF-US has indicated that BTSEC will be invited to attend such dialogues annually through 2032. Corporación Andina de Fomento (CAF): WWF Ecuador has been engaged as a co-EE to CAF as the AE for the GCF Funded Activity "Climate change: the new evolutionary challenge for the Galapagos" (FP185), where in its co-EE role it is responsible for one of the project components. WWF has provided support in project design for the component WWF Ecuador would lead to meet the GCF accreditation standards.

⁵ Document GCF/B.28/11/Add.02.

US Strategic Plan 2016–2020, p.6)⁶ that positioned WWF-US to influence the private and public sectors to increase climate ambition through a combination of greater financial commitments, increased adoption of renewable energy, stabilizing greenhouse gas (GHG) emissions from combatting deforestation, and greater implementation of strategies aimed at building resilience to climate change for communities and ecosystems. The new vision of WWF-US has been to promote a global shift toward a low carbon and climate resilient future with three major outcomes by 2025:

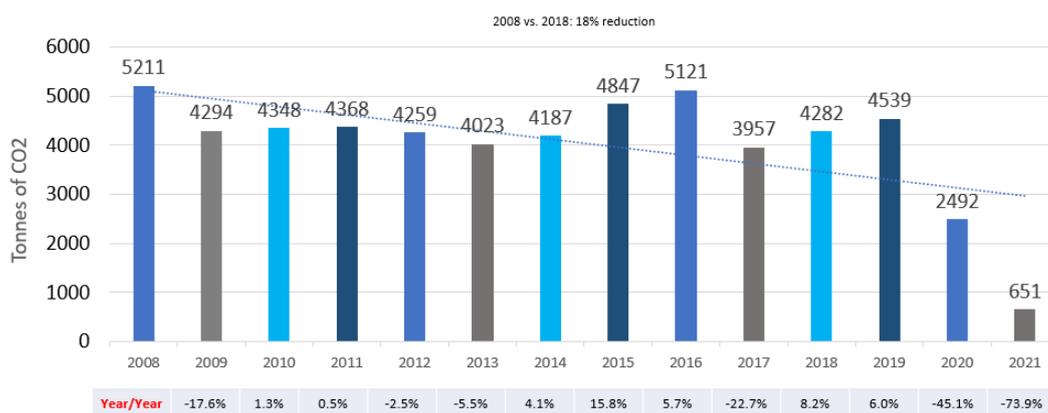
- (1) Renewable energy provides 50 per cent of global energy supply and is the basis of improved energy access and security in developing nations;
 - (2) Governments and key partners, including WWF-US, are implementing effective strategies that build climate resilience for communities and ecosystems; and
 - (3) At least USD 100 billion is invested annually in low carbon and climate resilient futures, and an appropriate price on carbon is secured;
- (ii) As the world has fallen behind on these ambitious targets, WWF-US is developing a renewed, organization-wide climate strategy (led by its new Senior Vice President for Climate Change) that will involve all results areas. This new strategy will continue WWF-US's investments in adaptation and mitigation while concentrating efforts in four key areas: deploying nature-based solutions for climate change adaptation and mitigation; influencing and mobilizing climate finance; transforming agriculture and food systems to reduce emissions; and promoting a green energy that minimizes environmental impacts. The final strategy is expected to be presented to the WWF-US Board of Directors for approval in October 2022;
- (iii) The AP finds the AE's policies and commitments as reflected in its WWF-US Strategic Plan 2016–2020 in the short, medium, and long term regarding investment in climate projects are in line with the GCF updated Strategic Plan;
- (b) **Guiding Question 2:** Does the entity receive resources from third parties for the financing of climate projects?
- (i) AE indicated that over the period December 2017 to December 2021 WWF-US raised USD 187,195,796 from external sources, to be allocated toward climate programmes and projects. Donors for WWF-US climate work (excluding the GCF) include a wide range of private philanthropic, corporate, bilateral and multilateral institutions, including Global Environment Facility, among others;
 - (ii) Annual revenue mobilized for climate programmes and projects:
 - (1) Dec 2017 – USD 5,167,902.06;
 - (2) 2018 – USD 5,474,766.49;
 - (3) 2019 – USD 21,415,601.98;
 - (4) 2020 – USD 110,496,909.47; and
 - (5) 2021 – USD 44,640,615.89;

⁶ WWF-US Strategic Plan 2016-2020.

- (iii) The AP finds that the AE has actively engaged with various international agencies to mobilize resources from third parties for the financing of climate projects.
- (c) **Guiding Question 3 (optional):** Does the accredited entity calculate and reduce its greenhouse gas emissions at the corporate level?
 - (i) WWF-US does not currently conduct a full annual inventory of its operational GHG emissions; but WWF-US is considering such an exercise in the near future (which would include satellite offices). WWF-US has no Scope 1 GHG emissions;
 - (ii) WWF-US has taken a number of steps in past years to reduce Scope 2 and Scope 3 emissions. These include:
 - (1) WWF-US corporate headquarters in Washington, DC is LEED Platinum certified. LEED certification is a globally recognized symbol of sustainability achievement and leadership;
 - (2) The building does not use any fossil fuels. All of the building’s electricity consumption is offset by the purchase of wind power renewable energy credits purchased through the local utility; and

Figure 1: WWF-US carbon emissions from air travel

WWF-US Carbon Emissions from Air Travel: 2008 - 2021



- (3) WWF-US has set an internal target to reduce emissions from air travel (Scope 3), which comprises the vast majority of its operational emissions, by 50 per cent by 2025 from a 2018 baseline. The amount of emissions from air travel and progress on Scope 3 emissions reductions (air travel) since 2008 is presented in Figure 1;
- (iii) The AP finds the AE’s reporting of its Scope 2 and Scope 3 emission levels to be adequate and Scope 3 levels demonstrate a decreasing trend over the period reported;
- (d) **Guiding Question 4 (optional):** Does the accredited entity evaluate the climate risks of its portfolio?
 - (i) WWF-US does not currently mandate comprehensive climate risks assessment across its entire portfolio. WWF-US evaluates climate risks when required by donor institutions using the relevant methodology approved by the donor. WWF-US is currently piloting a climate risk screening tool developed for all Global Environmental Facility (GEF) projects based on observed climate changes and impacts. WWF-US also conducts climate vulnerability assessments for adaptation projects using a variety of methods approved by donors, many times

with multiple scenarios using projected climate change scenarios. WWF-US's Environmental and Social Safeguards (ESS) review process also incorporates questions on climate risk and is applied at the landscape level where WWF-US has investments/programmatic work. WWF-US is moving toward screening a greater number of investments and using climate information in conservation strategy development and decision-making;

- (ii) Within WWF-US's GEF portfolio, nine projects have used this climate risk screening tool since 2020. These projects included investments in biodiversity conservation (terrestrial, fresh water, ocean), sustainable land management, fisheries management, land restoration, climate change adaptation, technical assistance projects and collaborative platforms (e.g., for nature-based tourism enterprises, nature-related financial disclosure platforms);
 - (iii) The WWF-US climate risk screening tool includes a preliminary assessment to be conducted before project objectives, theory of change and activities are determined. This approach ensures that field teams have a realistic understanding of what might be achieved in conservation work in a changing climate. A second climate risk screening is conducted during project development to identify adaptation responses based on stakeholder discussions;
 - (iv) The AP finds the AE's climate risk screening tool to be rational to support its decision on climate finance;
- (e) **Guiding Question 5:** What are the main sectors of activity of the accredited entity?
- (i) WWF-US does not invest in carbon-intensive projects. Climate-related projects are those that aimed to deliver climate change mitigation or adaptation outcomes, or both, as agreed in the funding agreements with the financial donors of those projects. It does not include investments in other work that may have incidental climate co-benefits. Much of WWF-US's climate work is aimed at influencing other actors to reduce their GHG emissions or build resilience to climate change shocks and stressors; setting standards for other actors in conducting these activities; providing science, technical support and capacity-building to partners in countries where WWF-US operates; and to influence climate policy and finance. WWF-US is also increasing its investments in the implementation of nature-based solutions to climate change adaptation and mitigation in geographies where there are also significant benefits to biodiversity conservation. Investments in non-climate work span multiple sectors that are aligned with WWF-US results areas in forest, freshwater, ocean and wildlife conservation, and sustainable food production. Investments in non-climate related work is generally aimed at reducing the environmental footprint of other actors, particularly government and private sector, that have no defined climate adaptation or mitigation outcomes, even if they provide some climate-related co-benefits;
 - (ii) The annual percentages of climate change adaptation and mitigation projects and all other, non-climate projects in the sectors described above, are shown in Table 1 below;

Table 1. Share of climate change adaptation and mitigation projects in WWF-US portfolio, 2017–2021, in percentage

	Total, %	2017,%	2018,%	2019,%	2020,%	2021,%
Climate	25.3	24.7	3.5	15.1	49.4	23.0
Non-climate	74.7	75.3	96.5	84.9	50.6	77.0

- (iii) The AP finds that the AE does not invest in fossil fuels related projects/programmes and its climate related investments show an increasing trend over this period;
- (f) **Guiding Question 6:** Is the accredited entity investing in mitigation projects/operations?
- (i) WWF-US further indicated that in the nature-based solutions space, it directly invests in ecosystem-based activities for emission reductions, however its portfolio of investments has not achieved maturity. The WWF-US expects that its newer projects are now measuring baselines for carbon stocks;
- (ii) The AE indicated that the total WWF-US investment in climate change mitigation programs and projects over the period December 2017-December 2021 is \$130,908,633. This amount reflects projects that have a direct investment in emission reductions and indirect investments that are influence orientated (i.e., encouraging behavioral change of private and public sector actors to adopt and implement ambitious renewable energy or emissions reduction targets). For these indirect investments – such as WWF-US’s campaigns to increase the uptake of renewable energy by companies or support for AMERICA IS ALL IN, a coalition that supports actions by non-federal actors in the US to reach net zero emissions by 2050 – WWF-US has not tracked reductions by partners in CO2 equivalent. Indicators of success of these investments or projects are therefore often “percentage increase in renewable energy use” by partners or “number of entities setting emissions reduction targets”, and similar indicators approved by external donors. In the nature-based solutions space, WWF-US does directly invest in ecosystem-based activities for emission reductions, but its portfolio of investments has not achieved maturity. Newer projects are now measuring baselines for carbon stocks. The AE indicated that because different investments track different measures of progress, aggregating this data across its portfolio is not possible at this time. The AE provided in a separate document on its investments in climate Programs and projects including details on goals, anticipated outcomes, and results of its top investments in climate change mitigation;
- (iii) For WWF-US’s GEF Portfolio, for revenue received between Dec 2017-Dec 2021, applicable projects target the following reduction of GHG emissions for a 5 to 20-year period: 37,985,778 tCO2eq. All of the relevant projects are still under implementation and their progress against these emission reduction targets can only be assessed upon project closure and completion of terminal evaluations. WWF-US’s calculations of GHG emissions reductions are based on the methodology available at: Ex-act tool to calculate GHG emissions (<https://www.fao.org/in-action/epic/ex-act-tool/suite-of-tools/ex-act/en/>);
- (iv) The AP finds the AE’s investments in mitigation programmes to be robust, resulting in estimated significant GHG emissions;

- (g) **Guiding Question 7:** Is the accredited entity investing in adaptation projects/operations?
- (i) The total, WWF-US investment in adaptation programmes and projects over the period December 2017–December 2021 is USD 56,287,163;
 - (ii) WWF-US indicated that it tracks a range of indicators for its adaptation projects, depending on donor requirements. Most of WWF-US adaptation investments have been in developing robust climate risk information to inform conservation and development work, or to build capacity of local communities and partners to use this information effectively in decision-making. Therefore, indicators for some projects might be “number of people trained” or “number of workshops held”. WWF-US’s on-the-ground adaptation investments have tended to be small pilot projects with no dedicated funding for monitoring and evaluation. Newer and larger investments in adaptation are dedicating significant resources to monitoring and evaluations to assess the impact of adaptation actions;
 - (iii) As regards WWF-US’s GEF climate change adaptation portfolio, for revenue received between December 2017 and December 2021, projects target the following total number of beneficiaries: 38,034 people (18,998 female; 19,036 male);
 - (iv) The AP finds AE’s investments in adaptation projects/programmes to be robust, resulting in significant impacts on its beneficiaries;
 - (v) The AE has not been involved (either past or current) in fossil-fuel financing.
34. The AP consider that the evidence provided by WWF-US for the first accreditation term demonstrates the continuous positive trend of developing climate change mitigation and adaptation and cross-cutting activities. Both the strategy and the trend of activities are aligned with the GCF mandate and objectives.

III. Stage II accreditation review assessment

35. The AE is eligible for, and applied under, the fast track re-accreditation process as a GEF entity. Its application has been assessed by the AP during Stage II (Step 1) against the accreditation standards of GCF and gaps identified in decision B.08/03 and in accordance with the re-accreditation requirements to the extent applicable to accreditation in paragraph 3 above.
36. Partnership with the GEF currently relies on a process of self-assessments by partner agencies, once per replenishment, to confirm that the agencies maintain the competence and minimum standards required by the GEF Council.
37. In 2020 the GEF Council initiated a process for an independent third-party review of compliance with GEF Minimum Fiduciary Standards in close coordination with GEF’s management, corporate policy units, regional bureaux and country offices.
38. These self-assessments are undertaken by the agencies and reviewed by a third-party expert(s) independent of the GEF Secretariat, providing additional comfort to the GEF Council. As a result of this process, if an agency were to be found to be non-compliant or partially compliant with a policy standard or set of standards, it would prepare a time-bound action plan to remedy identified deficiencies and submit it to the GEF Council for approval.
39. The self-assessment covers two broad criteria: (i) project/activity processes and oversight, including project appraisal, procurement processes, monitoring, project completion and financial closure, procedures to make project results publicly available, and the evaluation function; and (ii) governance framework, including external financial audit, financial

management and control frameworks, oversight of executing entities (EEs), financial disclosure/conflict of interest, code of ethics/conduct, internal audit, investigation function, hotline and whistleblower protection, and AML/CFT.

40. The independent review was completed in October 2021, and WWF-US was found to be fully compliant with all but one standard; subsequently an action plan was developed and fully implemented. In March 2022 the final clarifications have been submitted to GEF, with the expectations to receive an updated status of compliance from the GEF Secretariat. In June 2022, the GEF reported that WWF-US had completed its action plan and is in full compliance.

41. As part of this assessment, the AP consulted the AE's website and third-party websites to complement the information provided in the application.

3.1 Fiduciary standards

3.1.1 Basic fiduciary standards: key administrative and financial capacities

42. WWF-US did not have any conditions with regard to the basic fiduciary standards on key administrative and financial capacities recommended by the AP for the first accreditation term.

43. As per paragraph 35 above, the basic fiduciary standards concerning key administrative and financial capacities are considered to have been met by way of fast-track re-accreditation.

3.1.2 Basic fiduciary standards: transparency and accountability

44. WWF-US did not have any conditions with regard to basic fiduciary standards on transparency and accountability recommended by the AP for the first accreditation term.

45. As per paragraph 35 above, the GCF basic fiduciary standards concerning transparency and accountability, with the exception of policies on prohibited practices and the protection of whistleblowers and witnesses, investigation function and AML/CFT policies, have been met by way of fast-track re-accreditation.

46. WWF-US's Prohibiting Fraud Policy demonstrates how senior management does not tolerate fraud, financial mismanagement and other forms of malpractice. All staff are made aware of this policy via regular communications, backed up by on-going training. The Prohibiting Fraud Policy explains the concepts of fraud, corruption and bribery and provides examples to help staff identify possible breaches. It also details the process for reporting and investigating suspected cases, with the option to do so anonymously. Related policies include the Whistleblower Policy, Non-Retaliation Policy and Conflict of Interest Policy.

47. WWF-US's mandatory training for all staff on preventing corruption is divided into six separate areas which staff were required to take, or will have to take in FY23:

- (a) Fraud and Corruption Prevention;
- (b) Sexual Harassment;
- (c) Social Policies and Behaviour that Affects Others;
- (d) Conflicts of Interest;
- (e) Reporting Concerns; and
- (f) Cybersecurity and Protecting Confidential Information.

48. In addition, WWF-US is partnering with the US Agency for International Development (USAID) to examine how corruption impacts conservation and to design courses on how to combat corruption in conservation work.

49. WWF-US's Whistle Blower and Non-Retaliation Policies are adequate for the size and scope of WWF-US's operations. There are various avenues and tools for reporting suspected violations, misconduct and other issues, including the option to remain anonymous by providing information via a dedicated email or worldwide toll-free number operated by an external company. Partners, communities and other stakeholders can use these options to report suspected illegal or inappropriate activity, or concerns about the implementation of WWF-US projects, including issues relating to the environmental and social impacts of those projects. Also, staff can report issues to various levels of management, human resources, legal, or integrity and risk units.

50. WWF-US's Investigations Guidelines and Functions Description details the policies and procedures of the entity's independent and objective investigation function for allegations of fraud and corruption. In addition, the guidelines include a document describing potential issues and process for escalating each of them to the correct level within the organization.

51. WWF-US's chief accounting staff have received extensive Know Your Customer (KYC) and due diligence training from JPMorgan Chase, Standard Chartered Bank, and Western Union that highlights the new banking regulations and effective compliance with anti-fraud regulations and monitoring requirements. These trainings provide a context for the development of KYC internal controls and monitoring within WWF-US. In addition, WWF-US uses LexisNexis Bridger Insight Software to manage emerging risks around anti-money laundering and anti-terrorism threats. Bridger is a fully integrated compliance platform that enables WWF-US to consolidate compliance processes, standardize controls, and increase the efficiency of its KYC processes.

52. WWF-US has a number of internal policies and procedures covering anti-money laundering and financing anti-terrorism. WWF-US relies on banking partners (Western Union and JPMorgan Chase) for the successful and secure delivery of payments. These processes include the secure transfer of payment instructions to the banks' secure portals. Thereafter, the banking partners follow the US Federal Reserve banking regulations to process and deliver each payment. Notably, the banks have very strict requirements for delivering payments or returning unsuccessful payments. In addition to the procedures and practices previously provided in the application process, WWF-US has three main policies relating to its Code of Conduct that address the issues in the GCF General Principles on Prohibited Practices: Conflicts of Interest Policy, Whistleblower Policy, and Prohibition on Gifts to Government Officials. WWF-US continues to conduct annual mandatory staff training on fraud and corruption prevention as described in paragraph 47 above.

53. As per paragraph 35 above, the basic fiduciary standards on transparency and accountability are considered to have been met by way of fast-track re-accreditation. The AP also finds that the AE's policies, procedures and capacity, supported by evidence of track record, fully meet, to the extent applicable to accreditation, the GCF Policy on Prohibited Practices,⁷ the GCF Policy on the Protection of Whistleblowers and Witnesses,⁸ and the GCF AML/CFT Policy.⁹

3.1.3. **Specialized fiduciary standard for project management**

54. WWF-US did not have any conditions with regard to the specialized fiduciary standard for project management recommended by the AP for the first accreditation term.

55. As per paragraph 35 above, the specialized fiduciary standard for project management is considered to have been met by way of fast-track re-accreditation.

⁷ Decision B.22/19 and annex XIV thereto.

⁸ Decision B.21/25 and annex II thereto.

⁹ Decision B.18/10 and annex XIV thereto.

3.1.4. **Specialized fiduciary standard for grant award and/or funding allocation mechanisms**

56. WWF-US did not have any conditions with regards to the specialized fiduciary standard for grant award and funding allocation mechanisms recommended by the AP for the first accreditation term.

57. WWF-US has a detailed and well-supported appraisal process for grant awards. Detailed checklists for these reviews have been developed that include all appropriate technical, economic, financial, environmental, social and institutional elements consistent with programme and project requirements. Many of the requirements that WWF-US seeks in all proposal appraisals are specific elements of the WWF institutional planning, management and monitoring process known as the Standards of Conservation Project and Program Management (the Program Standards). This is a robust results-based management process that is fully adopted and applied by WWF-US and required of all project proposals. More specifically, the Program Management Standards are used to determine a project's targets, key threats, priorities, strategies, activities, expected results and outcomes, long-term goals, and specific indicators for monitoring and evaluation. The Program Standards include a comprehensive overview document, a very detailed Field Guide and over 30 reference guides (for various steps and elements) available on the WWF-US website.

58. As part of the WWF Program Standards planning and management process, project teams for appropriate projects are charged with developing comprehensive financial plans. These are financial models that provide detailed costs for all of a given project or programme's proposed strategies and activities, anticipated revenues from a range of sources (such as philanthropic, government, multilateral, NGO partners, and sustainable financing) and any anticipated gaps. All large WWF-US programmes develop 3- to 5-year financial plans, and many larger programmes have developed 10-year financial plans, all with the attributes described above. Once completed, the long-term financial plan is the basis for shorter-term budgeting, for fund raising, and for securing strategic partners to support the programme's strategies and activities.

59. WWF-US has access to tools for analysis of economic values and projected benefits from a range of development and conservation programmes. This work is largely carried out under a global programme known as the Natural Capital Project (or NatCap), a consortium of WWF-US, Stanford University, University of Michigan and The Nature Conservancy. The NatCap valuation model, known as Invest, evaluates a wide range of ecosystem services and calculates estimated values representing each service, spatially distributed across the project area. NatCap can be used to estimate the predicted economic benefits of investments and improved management practices to the people and communities in the programme area. WWF-US regularly performs economic appraisals of its project proposals, monitors their economic performance during implementation, and evaluates economic impacts at the project's end. The methodological framework for these exercises follows the traditional cost-benefit analysis of development projects.

60. In general, WWF-US does not have a standing grant proposal evaluation committee at the Headquarter or Country Office level. This would not be practical as WWF-US issues grants that focus on a variety of topics and geographies. As a result, the grant evaluation committees put in place by WWF-US are established as needed and in response to specific calls. Each committee includes staff with the appropriate skills, background and experience necessary to support the evaluation and recommendations related to that specific grant opportunity. For example, WWF-US includes technical and regional specialists as are appropriate for a specific opportunity. As a best practice, WWF-US does not deviate from an evaluation committee's final recommendations. Such a deviation would call into question the overall objectivity of WWF-US's evaluation processes.

61. To ensure consistent evaluation of grant proposals, WWF-US has established core policies and procedures to manage, evaluate and approve grant proposals. For process and timelines, WWF-US publishes its grant award system and processes for individual grant programmes as broadly as possible to ensure that each applicant is aware of the specific requirements and processes related to that opportunity. It is essential that there is no confusion between different programmes; therefore, WWF-US provides programme-specific information and not generic information. In addition to reducing confusion among potential applicants, WWF-US does not publish one process or system as WWF-US receives funding from a multitude of donors which may have their own requirements for grant selection. WWF-US engages with the donor to ensure that WWF-US's core requirements are met while adapting the standards to incorporate donor requirements. Through this process, WWF-US ensures that its approach meets the needs of the donor and is also in compliance with WWF-US's internal procedures and processes.

62. Prior to a grant being awarded, grantees are asked to fill out a pre-award survey to provide background information on accounting and internal controls, grants management and procurement systems and operations. This information aids WWF-US in performing a risk assessment to determine the grantee's technical and administrative capacity, commitment and ability to achieve the intended goals and results of the grant. Based on the risk assessment, an appropriate Monitoring Plan is developed that includes the deliverables, site reviews, and other activities or requirements deemed necessary for WWF-US to exercise proper technical and financial oversight of the project. Requirements identified in the Monitoring Plan are incorporated into the grant award agreements where applicable. The Monitoring Plan is reviewed with the grantee when necessary and re-evaluated on a periodic basis throughout the grant period in order to adjust as necessary to the grantee's current performance.

63. WWF-US executes a significant portfolio of projects financed by multilateral institutions. In addition to GCF, this list currently includes the World Bank, Inter-American Development Bank, and African Development Bank. Furthermore, WWF-US administers a large portfolio of bilateral funded projects, particularly those financed by USAID for which WWF-US is in good standing with regard to financial requirements.

64. The AP finds that the AE's policies, procedures and capacity, supported by evidence of its track record, fully meet the specialized fiduciary standard for grant award and funding allocation mechanisms.

3.1.5. **Specialized fiduciary standard for on-lending and blending for loans, equity and guarantees**

65. The AE did not apply for accreditation for this standard during its first accreditation term and did not apply for an upgrade in its accreditation scope for this standard at this time.

3.2 Environmental and social safeguards

66. WWF-US did not have any conditions with regard to the GCF interim environmental and social (ESS) standards recommended by the AP for the first accreditation term with a maximum accreditation scope of a maximum environmental and social (E&S) risk category B/intermediation 2.

3.2.1. **Environmental and social policy**

67. WWF-US provided its Environmental and Social Safeguards Framework (ESSF) approved by the Board of WWF International in June 2019 to ensure consistent, comprehensive application of safeguards across the entire WWF network. The ESSF is designed as a risk

mitigation management system to be applied to WWF-US activities, development and implementation that may potentially generate negative social or environmental impacts.

68. WWF-US has also developed the Safeguards Integrated Policies and Procedures (SIPP) which provides WWF-US staff with procedures to integrate environmental and social concerns into project design. The SIPP is composed of the following policies (similar to GCF interim environmental and social safeguard (ESS) standards): (i) Standard on Environment and Social Risk Management (ii) Standard on Protection of Natural Habitats; (iii) Standard on Resettlement and Access Restriction; (iv) Standard on Indigenous Peoples; (v) Standard on Pest Management; (vi) Standard on Grievance Systems; (vii) Standard on Community, Health, Safety and Security Policy; (viii) Standard on Cultural Resources; (ix) Standard on Disclosure; (x) Standard on Stakeholder Engagement; and (xi) Gender Policy.

69. The WWF network plans to update the ESSF which is currently undergoing public consultation and expected to be finalized by late 2022. The substance of the updated ESSF will not change and only the structure of the ESSF document will change. Once the updated ESSF document is approved, it will supersede the SIPP, and the SIPP will become the guidance document that details procedures of how to apply the ESSF for GCF and GEF projects. This process is expected to strengthen WWF-US's commitment to safeguards.

70. Since 2015 climate has been one of six major results areas (called "Goals") at WWF-US, along with food, forests, fresh water, oceans and wildlife. Between 2016 and 2020, WWF-US operated under its five-year strategy that positioned WWF-US to influence the private and public sectors to increase climate ambition through greater financial commitments, increased adoption of renewable energy, stabilizing GHG emissions from deforestation, and greater implementation of strategies aimed at building resilience to climate change for communities and ecosystems. WWF-US has supported the development and implementation of national climate commitments through technical inputs to inform the development of targets and measures under the nationally determined contributions, national adaptation programmes of action and national adaptation plans. WWF-US is currently developing a revised climate strategy that will focus its work on reducing emissions and sequestering carbon through nature-based solutions and enabling communities to adapt to climate change in harmony with nature.

71. As an environmental conservation NGO, WWF-US does not invest in fossil fuels.

72. SIPP includes a Policy on Indigenous Peoples which is under further revision and undergoing public consultation since May 2021. WWF-US provided its draft policy, and the revised policy will form its Standard on Indigenous Peoples. WWF-US have produced guidance on how to obtain free and prior informed consent. The AP finds WWF-US has the capacity to meet the GCF Policy on Indigenous People.

73. WWF-US's institutional-level policies on, "Prevention of Sexual Exploitation and Abuse, the Harassment-Free Work Environment, Non-Discrimination, Trafficking in Persons, and the Human Rights, that Relate to Sexual Exploitation, Abuse and Harassment (SEAH)", fall under the suite of policies in WWF-US's Code of Conduct. WWF-US have also developed the Guidance Note on Gender-based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) intended to assist project teams in identifying risks of GBV and SEAH that may emerge in conservation projects. The AP finds that the WWF-US has the capacity to meet the GCF Revised Environmental and Social Policy particularly regarding the provisions on SEAH.

74. While WWF-US does not have an institution-wide Evaluation Policy, it does have Evaluation Guidelines. For GCF, ESS and gender matters are evaluated in each Annual Performance Report (APR), Mid-Term Report and Terminal Evaluation Report, and adaptive measures are taken as necessary. The AP finds that WWF-US's Guidelines and practice meet the GCF Evaluation Policy, particularly as related to the evaluation of ESS and gender matters.

75. WWF-US's Safeguards team reporting to the Vice President of Conservation Program Management serves to ensure conformance to and execution of the ESSF. The ESSF is communicated within the organization and also externally through the project teams in the network. WWF-US provided evidence on internal training on safeguards and gender for its staff.

76. The AP finds that the AE's environmental and social management system, comprising the Environmental and Social Safeguards Framework (ESSF) and the Safeguards Integrated Policies and Procedures (SIPP), supported by evidence of its track record, fully meets the GCF Revised Environmental and Social Policy to the extent applicable to accreditation and GCF interim ESS standards for maximum E&S risk category B/I-2 projects/programmes with respect to performance standards 1–8.

3.2.2. **Identification of environmental and social risks and impacts**

77. The process of safeguards screening is described in the ESSF Standard on Environmental and Social Risk Management. The safeguards risk screening performed using the Environment and Social Safeguards Screening Tool (SST) is the first step in WWF-US's safeguards process. All landscapes¹⁰ in which WWF-US works must be screened to (i) identify potential negative social or environmental impacts; and (ii) identify opportunities to strengthen design or implementation. The screening also determines the overall E&S risk category of the landscape. Project-level review of social or environmental risks and impacts, including categorization, is carried out based on the procedure outlined in the SIPP.

78. The Safeguards Review Team reviews and conducts the screening of project documents during the project proposal submission stage, or during the project concept stage, or at the relevant stage determined by the Safeguards Review Team when activities financed under the project are well defined. The landscape Lead (namely the person appointed by the implementing office to oversee activities) leads the screening process, working with their project team. The screening results may lead to a project being designated as category A (full or comprehensive Environmental and Social Impact Assessment (ESIA) is required); category B (partial assessment is required, such as an Environmental and Social Management Plan (ESMP)); or category C (no further assessment is required). The E&S risk categorization is determined by the Safeguards Coordinator. WWF-US carries out an internal and external audit of the safeguard procedures once every three years.

79. As evidence of WWF-US's track record on its E&S risk and impacts identification, including categorization process, WWF-US provided E&S risk and impacts identification and categorization memos for a sample of projects.

80. The AP finds that the AE's system of identification of E&S risks and impacts, supported by evidence of its track record, fully meets the GCF Revised Environmental and Social Policy to the extent applicable to accreditation and GCF interim ESS standards for maximum E&S risk category B/I-2 projects/programmes with respect to performance standards 1–8.

3.2.3. **Environmental and social management programme**

81. The ESSF describes WWF-US's procedure on E&S mitigation and management measures. The Safeguards Reviewer uses the results of the safeguards risk screening phase to determine: (i) if any further impact assessments are required at the landscape level and what areas should be further assessed. Such impact assessments (social and environmental impact assessment, socioeconomic impact assessment, for example.) are carried out to fill gaps in

¹⁰ Per the AE, a "landscape approach" is a term used to describe collaborative initiatives in specific places that span multiple sectors and go beyond the scale of individual farms, forest management units and protected areas. Essentially, it means coherent intervention at a landscape scale to secure food, fiber and energy production, improvements in social welfare, water security and ecosystem conservation.

information and explore the potential impacts identified in the screening in more depth; and (ii) if it is necessary to develop an environmental and social mitigation framework (at landscape level) or an environmental and social management plan (at activity level) and its scope. An environmental and social mitigation framework, for example, can include measures to address access restrictions or impacts on indigenous peoples or if warranted, such issues can be addressed via dedicated plans.

82. If a landscape/project is categorized as medium risk, the implementing office will carry out the impact assessment and develop the mitigation framework or management plan with internal resources; however under certain conditions (for example, planning for complex free and prior informed consent processes) an external expert may be contracted to support the development of specialized components of the assessment and mitigation measures. These will be reviewed and approved by the Safeguard Reviewer.

83. If a landscape/project is categorized as low risk, there is no requirement to undertake any further impact assessment or develop a mitigation framework, unless new activities with a different risk profile are proposed for the landscape. After the categorization memo has been signed and disclosed, no further action is required for low-risk landscapes.

84. For all high or medium risk landscapes/projects, the Landscape Lead is required to conduct meaningful consultations with relevant stakeholders, including affected groups, indigenous peoples, civil societies organizations, and local authorities. Consultations should include the environmental and social impacts (positive and negative) and ensure the stakeholders' views are considered. Further details are provided in the Standard on Stakeholder Engagement.

85. WWF-US provided a sample of ESSF and ESMP for projects financed by it in E&S risk category B/I-2 financed by GCF and the Adaptation Fund.

86. The AP finds that the AE's E&S management programme, supported by evidence of its track record, fully meets the GCF Revised Environmental and Social Policy to the extent applicable to accreditation and GCF interim ESS standards for maximum E&S risk category B/I-2 projects/programmes with respect to performance standards 1-8.

3.2.4. **Monitoring and review**

87. The ESSF and SIPP describe WWF-US's E&S monitoring and reporting procedure for E&S mitigation plans that are integrated into the project's monitoring and evaluation framework and in regular project level reporting and are the subject of annual supervisory missions. More specifically, the ESMP identifies monitoring objectives and specifies the type of monitoring for both environmental and social impacts and the mitigation measures described in the ESMP. Specific measures include: (i) in the design phase of the project, indicators will be created to measure progress against all mitigation plans; (ii) during project implementation, the Safeguards Team reviews projects every six months through its Project Progress Reports; (iii) project teams will be required to report against their safeguards indicators and provide updates on the implementation of any project-specific safeguard plans as well as the mandatory Stakeholder Engagement Plan and Grievance Redress Mechanism; and (iv) the Safeguards Team participates in supervision missions annually for each project and reviews the safeguards and stakeholder engagement sections of the APRs.

88. The WWF-US Safeguard Coordinator is responsible for managing the overall supervision of safeguards for the WWF-US portfolio. At the project level, the responsibility of safeguards implementation is with the various project executing agencies who will have either project safeguards officers as staff or consultants hired to implement and coordinate activities related to safeguards. The Safeguards Coordinator builds the capacity of all project executing agency staff who are responsible for safeguards.

89. The applicant provided an example of one Midterm Report, one APR and an independent audit of ESS for one project, as evidence on its track record on E&S monitoring.

90. The AP finds that the AE's system of E&S related monitoring and review, supported by evidence of its track record, fully meets the GCF Revised Environmental and Social Policy to the extent applicable to accreditation and GCF interim ESS standards for maximum E&S risk category B/I-2 projects/programmes with respect to performance standards 1–8.

3.2.5. **External communications, consultations, information disclosure and grievance redress mechanism at the institutional level**

91. WWF-US has several channels to receive, assess and respond to E&S-related community grievances from persons and communities affected by its projects. WWF-US has established a register documenting E&S-related community grievances, however, it has not received any eligible community grievances in the past three years.

92. The Landscape Lead is responsible for disclosing E&S information relevant to stakeholders (duration, scale, proposed activities), but also potential risks for communities and planned mitigation measures. The form of disclosure is targeted to the audience in the appropriate language and channels of communication and in a culturally appropriate, non-discriminatory and gender-sensitive manner, free of external manipulation, intimidation or coercion. The E&S assessment documents are disclosed for at least 30 days prior to finalization of a new activity proposal and at least 45 days in the case of the presence of indigenous peoples in the activity area.

93. WWF-US's Policy on Accountability and Grievance Mechanism¹¹ has established an institutional-level grievance redress mechanism (GRM) to receive, assess and respond to complaints related to the implementation of its projects, and the unit responsible for its implementation is the Safeguards Team. According to the policy, WWF-US's Senior Director for Public Sector Support was designated as its Project Complaints Officer (PCO), charged with the responsibility to operate the WWF-US Grievance Mechanism. WWF-US has its own website for GCF activities with contact information for the GRM. WWF-US also has a safeguards resources website where it discloses all safeguards documents related to its GCF projects, which also provides information on the GRM. However, an examination of the provisions in the GRM document shows that the GRM is not independent. Furthermore, the GRM does not reflect the guiding principles on independence, legitimacy, transparency and predictability. WWF-US's Integrity & Risk Function will oversee the institutional-level GRM, including intake and assessment, which is to be reflected in an updated policy.

94. WWF-US has also established an online and phone mechanism hosted by a third-party provider, Ethics Point,¹² as an accessible channel for staff, partners, communities, and other stakeholders to report suspected illegal or inappropriate activity, or concerns about the implementation of WWF-US projects, including issues relating to rights as embodied in its Environment and Social Safeguards Framework.

95. WWF-US has a policy requiring its executing entities to incorporate GRM at project level. At the country level (project level), the Project Team is required to provide information on the GRM to affected parties. Typically, this is provided during consultations in the design phase of the project. The PCO coordinates monitoring by organizing periodic checks –bringing together the concerned parties and relevant technical advisers for calls, meetings, or any other communication on the status of action plans, until they are completed. WWF-US also assesses the effectiveness of this complaint resolution process on an annual basis and identify any needs for improvement.

¹¹ See <https://wwf.help/AGM>.

¹² See <https://secure.ethicspoint.com/>.

96. Grievances that have not been fully resolved at landscape or country levels may be escalated to the WWF network's Office of the Ombudsperson (formerly referred to as the Independent Monitoring and Review Function). The WWF network is establishing the office of the Ombudsperson, which will perform the independent monitoring and review function. This office will be independent from WWF International line management and will report directly to the WWF International Board.

97. WWF-US provided an update on the WWF network's progress to address the findings of the Independent Review that it had commissioned in 2019 to evaluate the WWF network's response to allegations of human rights abuses committed by some government rangers in certain countries. The update¹³ to WWF Management contains a response collectively for the WWF network to the recommendations of the panel of experts through a three-year Action Plan. The AP finds that the WWF network has been making significant – though uneven – progress across the 100 countries in which it operates. WWF-US (and other network offices) has shared with its partners, supporters, donors, and the public an update on the steps it has taken, the progress made, and the challenges it has faced in the first year since the Independent Review was concluded. WWF as a network is dedicated to fully delivering on its commitments to create improved outcomes for people everywhere it works.

98. WWF-US provided evidence on its track record on E&S information disclosure and on the implementation of GRM in the projects it oversees, managed by its executing entities.

99. The AP finds that the AE's system of external communications, consultations, information disclosure and grievance redress mechanism, supported by evidence of its track record, does not fully meet the GCF Revised Environmental and Social Policy to the extent applicable to accreditation, GCF interim ESS standards and GCF Information Disclosure Policy regarding E&S information disclosure requirements for maximum E&S risk category B/I-2 projects/programmes with respect to performance standards 1–8. The WWF-US Grievance Mechanism does not comply with the requirements of the GCF Revised E&S Policy including the UN Guiding Principles (Ruggie Principles) on GRM – namely independence, Legitimacy, transparency and predictability. The relevant gap is identified in paragraph 93 above and is reflected by the corresponding conditions for re-accreditation in section 4.2.

3.2.6. **Organizational capacity and competency**

100. WWF-US provided its organizational structure which shows the placement of its ESS and gender staff and associated management and provided their curricular vitae and job descriptions. WWF International Safeguards Unit maintains and oversees the safeguards framework and underlying standards. It comprises the Director of Safeguards and Human Rights, Regional Heads for Africa, Asia and Europe, the Social Policies manager, a Communications Officer and a Team Coordinator. The Unit is also supported by a Safeguards Team in WWF-US (which plays a regional oversight role for the Americas) and a 'practitioners network' of safeguard staff across national offices.

101. The International Safeguards Unit provides the following functions: (i) safeguards framework management: the Unit serves as the repository of safeguard standards and policies. The team maintains and strengthens risk screening tools and updates the safeguards framework as needed to align with international best practices; (ii) capacity-building: the Unit provides guidance and mentoring support on landscape screening and the development of mitigation frameworks. It also coordinates a community of practice (the safeguards practitioners group) and oversees the design and roll-out of training for all WWF network staff; and (iii) safeguards quality assurance: the review and sign off on all safeguard screening results and mitigation frameworks, including decisions to escalate higher risk landscapes (or activities

¹³ See https://wwf.panda.org/wwf_news/wwf_independent_review_year_1_implementation_update/.

within them) to the network level Conservation Quality Committee for further review and approval. Safeguards quality assurance is part of a wider risk and quality assurance process within WWF-US.

102. The Safeguards Team consists of a Lead Safeguards Specialist and a Senior Safeguards Specialist. The team reports to the Vice President of Conservation Program Management who is the head of the WWF-US Safeguards core team, which has a total of seven people who are qualified to manage ESS issues. This team is under the line management of the Chief Conservation Officer and includes staff knowledgeable on performance standards 1–8. WWF-US has conducted an E&S capacity-development programme for its staff.

103. The AP finds that the AE’s organizational capacity and competency to implement the environmental and social management system, supported by evidence of its track record, fully meet the GCF Revised Environmental and Social Policy to the extent applicable to accreditation and GCF interim ESS standards for maximum E&S risk category B/I-2 projects/programmes with respect to performance standards 1–8.

3.3 Gender

104. WWF-US did not have any conditions with regard to gender recommended by the AP for the first accreditation term.

105. WWF-US adopted its Gender Policy (GP) in May 2011. The overall objective of the GP is to ensure that WWF-US conservation policies, programmes and activities benefit women and men equally and contribute to gender equity. The GP describes the rationale for gender mainstreaming in the context of the WWF mission, biodiversity and footprint goals, and outlines WWF-US commitment to integrate a gender perspective in its programmatic and operational structures and procedures. The GP is consistent with the WWF Mission, Guiding Principles and Code of Ethics. It is an integral part of social policies and position statements adopted and/or mandated by GCF, including (but not limited to) indigenous peoples, human rights, poverty and conservation, population and HIV/AIDS. The GP is supportive of existing commitments to gender equality for those countries which are signatories to the United Nations Convention for the Elimination of All Forms of Discrimination Against Women and the Universal Declaration of Human Rights.

106. WWF-US commits to creating programmatic structures and procedures that incorporate a gender perspective into programme and project development processes through the application of gender awareness and analysis in the project cycle, including design, implementation, monitoring and evaluation and, where appropriate, to developing gender analysis and sex-disaggregated social and economic indicators and targets. WWF-US has developed a gender mainstreaming guide, tools and gender risk assessment procedure and other social and cultural considerations for gender mainstreaming and linking gender and climate change into its operational procedures. The Environment and Social Safeguards screening tool includes screening of a project to include relevant criteria for ensuring that the projects and programmes are gender sensitive.

107. WWF-US has also mainstreamed gender sensitivity across its internal human resource policies, procedures and governance mechanisms, as well as in the overall culture of the organization, for example in employment decisions ensuring that recruiting, hiring, responsibilities, training and professional development, promotion, compensation for transfers and termination are uniformly based on qualifications, including skills, abilities, knowledge and experience and actively pursues gender balance at all levels of the organization. In 2022, WWF-US has also launched its Diversity, Equity and Inclusion (DEI) strategy to help ensure equity and a sense of inclusion across the organization. Examples include conducting annual compensation equity reviews, launching a pay transparency campaign, and providing a variety of space

accommodations including improved disability access, a gender-neutral restroom, a furnished lactation lounge, and spaces for quiet contemplation, worship and mediation.

108. WWF-US provided its organizational structure which shows the placement of its ESS and gender experts' teams and provided their CVs. Like the safeguards structure, WWF-US manages gender mainstreaming for its GCF projects. This is done through the Integration and Performance Team's Gender Specialist, Director, of Gender, Social Inclusion and Safeguards who reports to the Vice President Conservation Program Management, who is under the line management of the Chief Conservation Officer (CCO). An additional two members of staff with gender expertise are part of the WWF-US Safeguards Core Team (seven people), with responsibility for managing WWF-US programming. The WWF network also has a Gender Working Group comprised of 10 gender experts based in Country Offices. The Gender Working Group's mandate is to support awareness-raising and capacity-building across the network in the application of WWF's social policies, including the Gender Policy.

109. WWF-US conducts an office-wide training on gender and often conducts brown-bag sessions and other staff engagements on different aspects of gender. Additionally, orientation and training are provided to executing partners during planning workshops. WWF-US has also demonstrated its commitment to making an exerted effort to expand its knowledge and commitment to social and gender equity through sharing of lessons learned and by applying this policy's recommendations in partnership activities with governments, donors, the private sector, NGOs and communities.

110. The AE provided a sample Gender Assessment and Gender Action Plan for its projects/programmes financed by the Adaptation Fund and GCF.

111. The AP finds that the AE's gender policy, procedures, capacities and competencies, supported by evidence of its track record, fully meet the updated GCF Gender Policy to the extent applicable to accreditation.

IV. Conclusions and recommendation

4.1 Conclusions

112. Following its assessment, the Secretariat concludes the following in relation to the application with respect to the potential to continue in the role of an AE and to support the mandate and objectives of GCF: the AE can continue to contribute to GCF in implementing its 2020–2023 Strategic Plan with respect to:

- (a) Alignment of the AE's GCF portfolio with the climate-related national priorities of the countries where the AE operates;
- (b) Potential to contribute to the adaptation and mitigation balance in the GCF portfolio since the AE focuses on adaptation activities;
- (c) Supporting diversity in GCF results areas such as health, well-being, food and water security; most vulnerable people and communities; and ecosystems and ecosystem services;
- (d) Enhancing private sector participation – taking in account the grant instruments the AE is seeking re-accreditation to work with – as the AE has a recognized track record in collaborating with companies in setting emission reduction targets validated by science; and
- (e) Mobilizing climate finance at scale since the AE is seeking to undertake medium-size projects/programme activities especially in light of the Project Finance for Permanence (PFP) approach implemented by the AE in its pipeline and portfolio.

113. Following its assessment, the AP concludes the following in relation to the application with respect to the AE's ability to meet the GCF accreditation standards and GCF policies relevant for accreditation for which it is seeking re-accreditation:

- (a) The AE meets the requirements of the GCF basic fiduciary standards, and, to the extent applicable to accreditation, the GCF Policy on the Protection of Whistleblowers and Witnesses, the GCF Policy on Prohibited Practices and the GCF AML/CFT Policy, and the specialized fiduciary standard for project management and the specialized fiduciary standard for grant award and funding allocation mechanisms;
- (b) The AE partially meets the GCF Revised Environmental and Social Policy to the extent applicable to accreditation, GCF interim ESS standards and the GCF Information Disclosure Policy on disclosure of E&S information in relation to the medium E&S risk (category B/I-2). The AE's institutional level GRM does not satisfy the requirements of paragraph 79 of GCF's Revised Environmental and Social Policy which sets out the attributes of such a mechanism;
- (c) The AE has demonstrated that it has a policy, procedures and competencies in order to implement its gender policy, which is found to be consistent with the Updated GCF Gender Policy to the extent applicable to accreditation, and has demonstrated that it has experience in gender consideration in the context of climate change; and
- (d) The AE has demonstrated that it has institutional-level systems, capacities and competencies regarding evaluation as required by the aforementioned GCF basic and specialized fiduciary standards and interim ESS standards that would enable it to implement the GCF Evaluation Policy and any standards for evaluation developed by the GCF thereunder for its GCF funded activities.

4.2 Recommendation on re-accreditation

114. The AP recommends, for consideration by the Board, WWF-US for re-accreditation for its second term as follows:

- (a) **Accreditation type:**
 - (i) **Maximum size of an individual project or activity within a programme:** medium¹⁴ (including micro and small);
 - (ii) **Fiduciary functions:**
 - (1) Basic fiduciary standards;
 - (2) Specialized fiduciary standard for project management; and
 - (3) Specialized fiduciary standard for grant award and funding allocation mechanisms; and
 - (iii) **Maximum environmental and social risk category:** medium risk (category B/I-2) (including lower risk (category C/I-3¹⁵)).
- (b) **Conditions:** the AE will be required to submit to the AP, through the Secretariat, information on how it has complied with the conditions. The AP will thereafter assess

¹⁴ As per annex I to decision B.08/02 (annex I to document GCF/B.08/45), "medium" is defined as "maximum total projected costs at the time of application, irrespective of the portion that is funded by the GCF, of above USD 50 million and up to and including USD 250 million for an individual project or an activity within a programme."

¹⁵ As per the Revised Environmental and Social Policy adopted in decision B.BM-2021/18, category C is defined as "Activities with minimal or no adverse environmental and/or social risks and/or impacts," and intermediation 3 is defined as "When an intermediary's existing or proposed portfolio includes financial exposure to activities that predominantly have minimal or negligible adverse environmental and/or social impacts."

whether the conditions have been met. This assessment will be communicated by the Secretariat, on behalf of the AP, to the Board for information purposes:

- (i) Condition to be met by the AE prior to effectiveness of the amendment and restatement of the accreditation master agreement during stage III of the re-accreditation process:
 - (1) Delivery of evidence by the AE, in a form and substance satisfactory to the GCF, that it has adopted and published on its website the policy and procedures of WWF-US's institutional-level grievance redress mechanism. The policy and procedures shall satisfy the requirements of paragraph 79 of GCF's Revised Environmental and Social Policy, which sets out the attributes of such a mechanism.

115. The AE has been informed of the recommendation for re-accreditation, including the accreditation type and condition, as identified in paragraph 114 above, and agrees to the recommendation.

4.3 Remarks

116. The AE is urged to update on its website the relationship between its institutional Grievance Redress Mechanism and that of the Ombudspersons Office of WWF International and the WWF network, which office has been provided with capacity-building assistance by the GCF Independent Redress Mechanism.

117. The applicant is already taking steps to meet the condition identified in paragraph 114(b) above.
