



**GREEN
CLIMATE
FUND**

Meeting of the Board

26 – 29 October 2026

Songdo, Incheon, Republic of Korea

Provisional agenda item 6(a)

GCF/B.46/18/Add.01

13 October 2026

Board effectiveness: Co-Chairs' report on key takeaways from the retreat and proposal for follow-up actions – Addendum I: Response matrix

Summary

This document contains the response matrix for the written comments received on the draft document titled “Board effectiveness: Key takeaways from the retreat and Co-Chairs’ proposal for follow-up actions”.

Comments matrix

Written comments received on the draft document

“Board effectiveness: Key takeaways from the retreat and Co-Chairs’ proposal for follow-up actions”

Comments received from 8 seats are contained in Table 1:

- Developing constituency: African States
- Developed constituency: Canada/Belgium, Denmark/Netherlands/Luxembourg, Germany, Italy, Japan, Switzerland/Finland, United Kingdom

In each section, seat views have been listed in alphabetical order and follow the structure of the paper.

Comments received from the GCF Observers network (CSO) are contained in Table 2.

Table 1: Response matrix for Board comments

Document Issue/Provision	Board seat	Comment	Secretariat Response
General comments			
General Comments	Canada / Belgium	The Canada-Belgium Board seat strongly welcomes the continued efforts to improve Board effectiveness and make progress on this item at B.46. We are grateful for the Secretariat’s continued support and highlight our satisfaction with the outcomes and added value of the Board retreat on the margins of B.45, noting the importance of maintaining momentum it generated as we move forward with concrete proposals for improvement. This includes pursuing decisions not only at B.46, but also at future Board Meetings should issues remain.	Thank you, your comment is noted.
	Denmark/ Netherlands /Luxembourg	We are supporting the co-chairs proposal, and the secretariat’s work done regarding Board effectiveness.	Thank you, your comment is noted.

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		We are also happy to see this on the agenda of the Board at B.46 and are looking forward to the discussions at Board meeting.	
	Germany	We would like to thank the Co-Chairs and the Secretariat for continuing to advance the Board effectiveness agenda and for responding to the mandate arising from the Board's decisions at B.44, as reflected in the present document. For Germany, this is a central issue and a clear indicator of how the GCF's performance is perceived and evaluated, both internally and externally. We have long advocated for more effective Board collaboration, a shift towards a more strategic oversight function for the Board, a clearer division of labor with the Secretariat, less cumbersome decision-making, and a reduction in the GCF's overly bureaucratic governance structure. This is also important in view of GCF-3 and the Fund's enhanced commitment authority: the GCF must be able to deliver at greater scale and pace, especially in the interests of recipient countries, particularly LDCs and SIDS. We also appreciate the opportunities to engage and provide input throughout the Board effectiveness process. This agenda has now been discussed at several Board meetings, and its direction has consistently been grounded in previous Board discussions and decisions, as well as in mandates decided by the Board. We consider it important that all Board seats are heard throughout the process, and we are grateful for the opportunities to provide input along the way. We particularly welcomed the	Thank you, your comment is noted.

Document Issue/Provision	Board seat	Comment	Secretariat Response
		constructive and fruitful collaboration at the Board retreat. It was clear at the retreat that this is an important issue for every seat and that the Board as a whole is interested in working together more efficiently and effectively.	
	Italy	Italy welcomes the draft document and, in general, supports its structure, content and level of ambition. We appreciate the comprehensive effort to translate the discussions held during the Board Retreat in Dushanbe into a practical set of measures aimed at improving the efficiency and effectiveness of Board governance.	Thank you, your comment is noted.
	Japan	Japan generally supports the overall direction of this paper. We appreciate the focus on improving Board effectiveness, making better use of Board time and enabling the Board to concentrate more on strategic guidance and oversight. We also recognize that many international financial institutions have sought to strengthen their effectiveness through greater use of intersessional processes, clearer delineation of responsibilities, and more focused governance arrangements. In that regard, we consider this document a useful contribution to the ongoing discussion on how the GCF governance framework can continue to evolve as the Fund matures.	Thank you, your comment is noted.
	United Kingdom	We welcome the paper and its framing on areas of improvement that can be pursued immediately and in the longer term. The UK seat is supportive of the measures proposed for consideration and approval by the Board, but	Thank you, your comment is noted.

Document Issue/Provision	Board seat	Comment	Secretariat Response
		request a limited number of changes are made to support their efficacy, (...)	
Board paper, Section II: Takeaways from the retreat			
General	African states	Mandate and the draft provisional agenda: We do not concur with the interpretation that Board decision B.44/02 mandates the CCs to propose a decision with follow-up actions, noting that, procedurally, the report of the session at B.45 is informal, the report has not been adopted by the board, and there was no decision-making status of that session. As noted in the technical session, we do not support including a substantive decision in the Board document for consideration at B.46. If the CCs proceed with a decision, the African members will not be able to support adoption of the provisional agenda. If this were to be the case, the Board may need to decide on the following actions: 1) Not to proceed with B.46, with the CCs accepting responsibility; 2) Adopt the agenda without the documentation and not to use the documentation as the basis of any deliberations on the CC's report; or 3) Adopt the provisional agenda with the agenda item held in abeyance.	Board decision B.44/02, paragraph (c) states: <i>“Requests the Co-Chairs, with the support of the Secretariat, to capture key takeaways relating to Board effectiveness from the retreat referred to in paragraph (a) and to propose follow-up actions to inform subsequent work and proposals for Board consideration.”</i> Although the Board retreat was organized by Board decision, it was not a Board meeting and there is no requirement that its report be adopted by the Board before the Co-Chairs are able to discharge themselves of the B.44/02 mandate to propose (1) follow-up actions to inform subsequent work and (2) proposals for Board consideration.
II. Takeaways from the retreat	African States	As stated in the technical session, we do not see any prioritization of this matter for discussion at B.46. The mandate from B.45 is clear: CCs should capture key takeaways and propose follow-up actions. We could only agree to follow-up action on a	Proposal of follow-up actions does not exclude decisions being made on the basis of the proposed actions, including at the same meeting. The Board adopting a decision is an action and it could follow from the matters discussed at the retreat.

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		procedural but not a substantive basis. We also view that, to use the B.23/03 procedures, the Board would first need to adopt the provisional agenda and second, open the specific agenda item. In this regard, the adoption of the agenda is entirely in the hands of the Board CCs and how they wish to proceed, noting this clearly expressed view on the matter. We note again that, before deciding on this matter, it is imperative that the CC ensure the Board can make additional proposals, as the Danushbe takeaways do not represent all options available to the Board. In this regard, we propose the following matters for consideration by the Board: 1) Change the 5-year work programme to a 10- to 12-year work programme to ensure that policy discussions and/or changes take place only every 2-3 replenishment periods. Policy changes deemed urgent can be considered on a case-by-case basis, but the Board work programme remains policy-heavy and obscures the Fund's purpose of approving financing. This would allow for policy-light board meetings focused on approvals and strategic matters, and it would provide policy certainty for countries and AEs 2) Change the USP from a replenishment-period-focused plan (4-year focus) to a longer-term approach aligned to country climate strategies and plans (10-12-year focus). The current USP cycle is obsolete and no longer responds to changes in the external political environment. We propose this change for USP-4.	The proposals made here on the work programme cycle and the USP cycle were not raised in the effectiveness retreat, which is why the report and takeaways, while not an exhaustive list of all areas discussed, could not be expected to include matters which were not discussed. When discussing the proposals based on the retreat takeaways, the Board may also consider further proposals made at that time.

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		3) The Board should rethink its programming approach. Right now, on a nominal basis, the average project size of the GCF contribution is between USD 70-80million. The Board is programming 40+ projects per year. The Board should consider increasing the GCF contribution to upwards of USD 100 million per project, without standardizing project size. This might be important given the expected negative growth replenishment scenario. 4) The AGN has long held the view that the role of the ITAP at this stage in the Fund's growth needs to be reconsidered. ITAP was established when the Secretariat was newly established and had limited staff capacity; as such, an independent technical advisory function was necessary. With a full-time GCF staff component of almost 380 technical staff, the role and necessity of the independent technical advisory function must be considered. 5) We propose assessing the Board consultation process to enhance its effectiveness and the participation of developing country Board members. We request the Secretariat to provide an overview of the participation rates of developing countries in Board technical sessions and the submission process in order to deepen our understanding and to make proposals to make this critical element of the Board's work more effective.	4)The role of the iTAP is subject to a separate Board mandate and workstream on the Panel's comprehensive review. The effectiveness of the Board is influenced by the effectiveness of its advisory bodies, but not all initiatives need to be simultaneously addressed in a single set of proposals to be mutually informed and compatible.
	Canada / Belgium	We believe the document provided captures the outcomes of the retreat well, and we are generally supportive of the key takeaways and next steps proposed by co-chairs. Change and evolution of the GCF and its Board are crucial to the Fund's	Thank you, your comment is noted.

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		efficiency and ability to grow its impact. We encourage the Secretariat to support current and future co-chairs to move forward with proposed actions.	
	Italy	We believe it is particularly important to recognize and build upon the positive outcomes of the Board Retreat in Tajikistan. The retreat demonstrated that participants from both constituencies were able to work together in a constructive, pragmatic and results-oriented manner, focusing on a shared objective: ensuring that the GCF Board can operate more effectively and make the best use of the limited time available during Board meetings. We therefore strongly support maintaining this momentum and translating the retreat outcomes into concrete decisions at B.46.	Thank you, your comment is noted.
	Switzerland / Finland	We fully share the key takeaways from the Board's retreat and appreciate the rapid follow-up by the co-chairs. We consider that there was a significant amount of convergence during the retreat, which is well captured in the consultation document. It is critical to take measures as soon as possible, otherwise the Board would not be able to follow up on a more ambitious workplan with higher commitment authority. The current amount of information produced can be overwhelming for the Board, and it will not be feasible to screen more than 15-20 projects per Board meeting adequately in less than 3 weeks. In addition, it is important in the context of the replenishment to show improved effectiveness of GCF governance as requested already at B.42.	Thank you, your comment is noted.
	United Kingdom	We also seek [...]	The Board Effectiveness Retreat Outcomes Report circulated to the Board on 26 August 2026 was a Co-

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		- Explicit acknowledgement of the discussion held within the Retreat relating to virtual and hybrid Boards. - Confirmation (or inclusion within the Board paper) that the Secretariat has an ongoing mandate to propose additional changes to support Board Effectiveness, including related to all areas outlined within this paper, to the Board.	Chairs' synthesis and was not intended to be an exhaustive record of all the ideas/proposals discussed at the retreat. The draft Board document on Board effectiveness is thus based on the synthesized key takeaways that stemmed from the Board retreat and the Board is of course welcome to add to the proposals during the Board meeting discussion of this topic. The proposed draft decision text contains language on continued mandate on effectiveness, with the Co-Chairs continuing to be in the lead of this Board process.
Board paper, Section III: Co-Chairs' proposal			
General	Canada / Belgium	Recognizing that some of the proposed changes introduce significant deviation from existing practices, it may be useful to offer a trial period, for example, or allow a review of the process after a specific length of time. In addition, we would welcome regular reviews of Board effectiveness, to determine the level of effectiveness and impact and to suggest future actions. Future Board retreats could also be considered, though this should not be assumed as standard practice moving forward.	The proposed draft decision text contains language on continued mandate on effectiveness, with the Co-Chairs continuing to be in the lead of this Board process.
	Switzerland / Finland	We think that these measures are a first step towards greater effectiveness, and that this should be a regular discussion based on the lessons learned and GCF's evolution. We appreciate that areas for future work are identified. We call in particular to hold virtual Board meetings, and to further develop a one-Board spirit, e.g. by having more dialogues	The Board Effectiveness Retreat Outcomes Report circulated to the Board on 26 August 2026 was a Co-Chairs' synthesis and was not intended to be an exhaustive record of all the ideas/proposals discussed at the retreat. The draft Board document on Board effectiveness is thus based on the synthesized key takeaways that stemmed from the

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		with both constituencies ahead of meetings rather than separately. We underline the importance of respecting the 21-day deadline for the circulation of documents, and circulating them as soon as they are ready. Green light from the co-chairs should not be necessary if there are no major contentious issues. We also encourage further prioritizing policy reforms, focusing on 2-3 per Board meeting. Finally, we consider the growing duration of Board meetings to be an issue, as the climate finance calendar is already very packed.	Board retreat, and the Board may add to the proposals during the consideration of the proposals.
	United Kingdom	We also seek [...] • More broadly, we believe the paper could helpfully provide comparisons to the practices of other similar international institutions for suggested changes.	Thank you for your suggestion. Due to time constraints, additional benchmarking analyses would not be available for insertion in the published proposal.
3.1 Measures to be advanced within existing mandates	Canada / Belgium	Specifically, we support: [...] • Informal engagement with constituencies between meetings.	Thank you, your comment is noted.
	Germany	• We fully support the proposed practical improvements that can be taken forward under existing mandates. In particular, improvements to Board documentation and information flows, more disciplined agenda management, opportunities for informal engagement between meetings, and stronger support for the Co-Chairs can all contribute to more effective Board work. • With regard to Board documentation and agenda management, we find that Board meetings	The new proposed draft decision contains a request for the Secretariat to comprehensively assess the current Board-mandated reporting documents and practices and to revert with a proposal for consideration by the Board.

Document Issue/Provision	Board seat	Comment	Secretariat Response
		are often overburdened with recurring reporting and non-strategic items, leaving less room for the Board to discuss policy matters or other pressing issues. We therefore encourage the Secretariat to identify as much scope as possible to reduce this burden. We believe that many reporting items, for example, Secretariat reports, reports from independent units, budget execution reports, reports from Board committees, panels and groups, and pipeline and portfolio performance reports, could be handled through BBMs or, where appropriate, moved to an annual reporting cycle. Where there is an urgent need for the Secretariat, independent units, Board committees or panels to engage with the Board, brief oral presentations at Board meetings would, in our view, suffice.	
	Switzerland / Finland	The identified low-hanging fruits which do not require change to existing mandates and ROP should be implemented as first priority. These include improving and consolidating board documents, presenting clearly matters requiring board consideration and decision and avoiding duplication.	Thank you, your comment is noted.
3.2 Measures proposed for consideration at B.46 DECISION-MAKING WITHOUT A BOARD MEETING	African States	Decision-making: The consultation draft proposes that the Board revisit its B.32/11 decision and its guidelines on the extraordinary use of decisions without a Board meeting. We recall that in the preceding meetings leading to the B.32/11 decision, this matter was discussed at length. The view as expressed by the African members at that time remains the same. As we noted in the technical session, this decision-making modality requires an objection even if a Board member wishes to seek	The proposal which was put for consultation includes a procedure for review and consultation which would be adopted by the Board and which would provide the opportunity for Board members to share any and all feedback short of an objection, precisely to fill that gap. This review and consultation procedure precedes the launch of the formal proposal for a decision between meetings.

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		clarification or postpone consideration of the matter. We do not support any amendment to the B.32/11 guidelines; paragraph (e) of Annex X, which states: "Pursuant to a Board decision which expressly envisages that a specific matter may be issued for a decision without a Board meeting." Given this paragraph, the proposed revision of the guidelines is redundant. Should the Board wish to include additional measures, the guidelines only require a decision by the Board, not a reopening of the guidelines. In this regard, and on procedural grounds, we cannot agree to the proposal to amend the guidelines. On substantive grounds, we maintain our previous view that we do not support using this decision-without-a-Board-meeting modality to transition decisions that, by their complex nature, require Board deliberation. This modality is designed to allow the Board to make decisions on an extraordinary basis and, as such, it does not replace regular Board decisions, which are more deliberate in nature. We also note that any objection to a decision is worked through only between the CCs and the objecting member, removing the Board from consideration or any role in resolving the objection. To exclude the Board from such deliberation is undemocratic, not inclusive, and not transparent. This would apply to both funding and accreditation proposals.	The position is noted. However, from a governance perspective, we consider it to be clearer and more transparent to update the guidelines, ensuring that everything is in one place. The introduction of a Consultation Procedure to precede and complete the no-objection procedure aims at diminishing the likelihood that an objection is raised by providing a formal review and consultation process which deals with all feedback short of an objection and which allows to request that a proposal be considered at a meeting. Both of these additional tools aim at remedying the shortcomings of the no-objection procedure without revising it. The Co-Chairs requested that two options illustrate the number of proposals that could be eligible based on variations in the proposed criteria. These are

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		Specifically on funding proposals, the Sec has suggested that in 2027, approximately 50 proposals could qualify under the proposed eligibility criteria. We note that the Sec work plan still under consideration proposes that, under the business-as-usual scenario 1, a total of 42- 51 proposals for the entire year (3 Board meetings) would be submitted to ITAP. This would mean only proposals over 50m come to the Board, which raises the question of the Board's role in session. Thus, the proposal seems to mirror a biased view that the Board should shift from a physical to a virtual domain. Take the same approval for scenario 2, assuming the resolution of the 2027 Administrative budget to programme the RCAF; the Sec assumes that the 65-76 proposals were submitted to ITAP. Assuming the same ratio of 50 FPs meeting the proposed criteria, and accounting for ITAP rejections, the Board is expected to approve only 15-20 proposals over 3 meetings, which is the average approval rate per each physical Board meeting under current practice. This again raises the question of what purpose this modality serves, as it is not about faster approvals or efficiency, but about diminishing the role of developing countries in the Board and moving the Board from the physical to the virtual domain.	models for illustration and not a “pipeline”. There are currently 188 proposals in GCF’s overall project pipeline, so the illustrative number of eligible proposals represent less than one-third of GCF’s total project pipeline.
	Canada / Belgium	Specifically, we support: [...] • Efforts to explore which kinds of decisions can be taken between Board Meetings, to help speed up decision making. • In this regard, we are supportive of the approach taken to establish criteria for Funding	Thank you, your comment is noted. The proposed criteria (including additional criteria) were suggested to collect feedback on the level of ambition, mindful of the different type of engagement required for consideration of proposals between meetings. These criteria may incentivize AEs to

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		Proposals that would be eligible for approval by B-BM. However, we would welcome additional explanation on the rationale of limiting this to only non-reimbursable grants, and note that the USD 50 million threshold may be too high.	submit to GCF more proposals meeting these requirements. Therefore, the Board may wish to consider including additional financial instruments or changing the GCF financing threshold to ensure the appropriate balance of ambition and programming incentives.
	Germany	- We strongly believe that greater use of BBMs is essential to the Board's future effectiveness. We are currently dealing with around 20-30 FPs at each Board meeting, and this number is likely to increase in the coming years in light of the GCF's enhanced commitment authority and the implementation of the NCQG decision to triple outflows. In addition, we process up to ten APs at each meeting. Funding and accreditation proposals already require around two days of Board meeting time. This valuable time could instead be devoted to strategic discussion and oversight. As the number of proposals continues to grow, the Board will not be able to discharge its responsibilities effectively without making greater use of BBMs. Otherwise, the Board risks becoming a significant bottleneck, ultimately affecting the GCF's ability to deliver. Given the urgency of the climate crisis, we should aim to direct financing to GCF partner countries as efficiently and quickly as possible. - In our view, the proposed approach remains far too unambitious. We would prefer all funding proposals to be considered initially through a written procedure, without eligibility restrictions, with any proposals requiring further discussion then placed on the agenda of the next Board meeting. The same approach could be applied to	Thank you, your comment is noted.

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		accreditation proposals and project change requests. - With this being said, we generally support the Secretariat's proposal for a predictable and orderly process for considering FPs and APs, under which proposals would be circulated to the Board for review over a defined period. During this period, Board members would be consulted. If an objection is raised, it should be handled as stipulated in paragraph 43 of the Rules of Procedure. In principle, we would be comfortable either with initiating these Board review processes at set intervals and bringing forward packages of FPs and APs, or with allowing FPs and APs to proceed towards Board approval on a rolling basis as soon as they are ready. If we were to pursue the latter option, we would trust the Secretariat to manage a steady and workable flow of FPs and APs without overburdening the Board. - Such a process would preserve meaningful consultation where needed and allow all Board members to raise concerns in a transparent and inclusive manner, while enabling decisions to proceed more efficiently where issues can be resolved in writing. Other climate funds, including the Climate Investment Funds, already handle project-related matters exclusively through written procedures. This has not created any difficulties; quite the opposite: discussions tend to focus much more on the substance of project proposals, helping to refine them at every stage of the approval process. Where an objection is raised, the matter can be brought to the next meeting and discussed there in detail, without spending time on funding	The Consultation Procedure is a new proposal and it aims at providing a predictable process to convey and address any feedback short of an objection. Then, after that new procedure is completed, the Secretariat, in consultation with the Co-Chairs, would transmit those proposals for which a request was not made to be considered at a Board meeting with the invitation to approve the decisions on a no-objection basis, in accordance with the Rules of Procedure (including paragraph 43).

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		proposals that are generally uncontroversial. In almost all cases, however, concerns are sufficiently addressed through the written process. As stated above, we are also convinced that many recurring reports circulated for the Board's consideration ahead of Board meetings could be dealt with through greater use of BBMs. In our view, this applies in particular to reports from panels, committees and groups, budget execution reports, portfolio performance reports, financial audit reports, and so on.	
	Italy	In light of the maturity reached by the Fund and the continued growth in the volume and complexity of funding proposals and accreditation applications submitted to each Board meeting, we consider it increasingly necessary to modernize the Board's decision-making arrangements. The current model risks consuming a disproportionate share of in-person meeting time on matters that could be addressed more efficiently through intersessional processes. As highlighted in the document, greater use of decisions between Board meetings for suitable funding and accreditation proposals, as well as for regular reporting, is both timely and necessary. In our view, delegating the consideration of lower-risk proposals and routine reporting matters to structured decision-making processes between Board meetings should no longer be postponed. At the same time, the proposed safeguards remain appropriate, notably the possibility for any Board member to request that a specific matter be	Thank you, your comment is noted.

Document Issue/Provision	Board seat	Comment	Secretariat Response
		brought back for discussion at a formal Board meeting. Regarding the eligibility criteria for funding proposals, Italy would favour an ambitious approach. In particular, we see merit in applying the proposed USD 50 million threshold, which according to Annex X would allow a substantial share of the 2027-2028 pipeline, amounting to approximately USD 1.44 billion of GCF financing, to be considered through intersessional processes. Such an approach would generate meaningful efficiencies from the outset. Nevertheless, we remain open to compromise solutions that can secure broad Board support while still delivering tangible improvements. Ultimately, we believe that a more efficient use of Board time will benefit not only the Board itself but, more importantly, developing countries and project beneficiaries awaiting timely decisions and access to climate finance	
	Switzerland / Finland	We support the expanded use of decision-making between Board meetings (BBM) for APs and FPs. This is already allowed by the ROP. This is a key criterion for being able to implement the new Commitment Authority and speed up access. Regarding FPs, we prefer in a first phase to allow approval on a non-objection basis of projects under USD 25 million of GCF funding - or a lower amount initially - and in the low ESS risk category. In addition, iTAP's endorsement of the project without conditions should also be a prerequisite for using the BBM procedure. The type of financial	Thank you, your comment is noted. There is no proposed change to the role of the iTAP. Decision B.17/09 continues to apply to all proposals.

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		instrument, accredited entity, and the fact that the project used the PSAA modality should not be criteria in our view. We support the proposed process, which would not only allow objections to the BBM, but preserve the full ability of the board members to raise questions and discuss with AE in technical session as has been the practice to date. To enhance transparency and to preserve the opportunity for formal communication, it may be useful either to incorporate written and oral statements including from observers annexed to the decision itself. Board members will also have the opportunity to make a statement under the standard agenda item “Decisions proposed between meetings” during recorded Board meetings, if needed.	
	United Kingdom	The UK seat is supportive of the measures proposed for consideration and approval by the Board, but request a limited number of changes are made to support their efficacy, (...) • The removal of total project size and financial instrument from the criteria for the eligibility of funding proposals for decision between board meetings. We believe their inclusion could create incentives that are misaligned to the GCF’s investment criteria and their removal is not inconsistent with the objectives of the wider proposal, • The removal of the additional criteria related to PSAA applicants, [...] We also seek	Thank you for the comments. Regarding funding proposals, removing criteria on project size and financial instruments could reduce the potential for distortions in the pipeline resulting from incentivizing certain types of projects.

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		- The explicit commitment within this document that a list of all approved projects between BBMs are recorded within the subsequent Board's documents, and that an opportunity is provided for Board Members to provide remarks at the subsequent Board on projects approved via BBMs. - Greater background on the impact that no change to the use of BBMs would have on the Board's ability to approve the increased number of project proposals indicated under the scenarios presented by the GCF within the GCF's workplan. - Analysis of current practice on the Secretariat's capacity and effectiveness to deliver funding proposals for Board approval. - Analysis of the impact of current practice on AE's access to timely climate finance. - Greater background on the existing practice of the Board and the depth of the Boards engagement related to projects proposed for BBM. Specifically, an analysis of the depth and substantiveness of discussions prior to a project being approved.	Paragraph 44 of the Rules of Procedure already requires that all decisions approved in-between meetings be recorded in the report of the following Board meeting. Statements (in addition to those which may have been made during the consultation and no-objection procedures), could be invited as part of the agenda item on B.BMs, or as part of the agenda item on the consideration of funding proposals. In this latter case, the Co-Chairs could also highlight the total funding and scope approved since the Board last met (therefore including via B.BM). This could be practically managed through the Co-Chairs' statements and the management of the meeting. Analysis on these areas would require substantive work and could be provided as part of future discussions on Board effectiveness, including the potential review of the effectiveness of any of the proposals which could be adopted by the Board under this initiative.
3.2 Measures proposed for consideration at B.46 SHARING OF REGULAR REPORTS OUTSIDE OF BOARD MEETINGS	Canada / Belgium	Specifically, we support: [...] The sharing of regular reports outside board meetings; however, a catch-all approach should be avoided, and the Secretariat should weigh the decision to share a report in this manner on a case-by-case basis.	Thank you, your comment is noted. Indeed, the regularity, form, and overlaps between reports which have been required by the Board will be thoroughly analyzed before a Board decision is sought on a new schedule and forum for them.
	Germany	We fully support the proposed practical improvements that can be taken forward under existing mandates. In particular, improvements to Board documentation and information flows, more	Thank you, your comment is noted.

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		disciplined agenda management, opportunities for informal engagement between meetings, and stronger support for the Co-Chairs can all contribute to more effective Board work. With regard to Board documentation and agenda management, we find that Board meetings are often overburdened with recurring reporting and non-strategic items, leaving less room for the Board to discuss policy matters or other pressing issues. We therefore encourage the Secretariat to identify as much scope as possible to reduce this burden. We believe that many reporting items, for example, Secretariat reports, reports from independent units, budget execution reports, reports from Board committees, panels and groups, and pipeline and portfolio performance reports, could be handled through BBMs or, where appropriate, moved to an annual reporting cycle. Where there is an urgent need for the Secretariat, independent units, Board committees or panels to engage with the Board, brief oral presentations at Board meetings would, in our view, suffice.	Indeed, the regularity, form, and overlaps between reports which have been required by the Board will be thoroughly analyzed before a Board decision is sought on a new schedule and forum for them. Most matters where presentation or intervention is desired could be raised under a substantive agenda item, and agenda items of reporting do not need to be maintained just in case there is a matter which may require discussion.
	Switzerland / Finland	We fully agree with the objective of reducing the Board time dedicated to regular reports. Reports from committees, panels and groups, independent units, and co-chairs should be made available at each Board meeting for information but do not need to be on the agenda for discussion, unless a formal discussion is requested by a Board member. This of course excludes IEU evaluations and IRM cases, which should always be discussed. The reports on the activities of the Secretariat, the execution of the administrative budget, and on the status of GCF resources should be discussed at least	As highlighted in the presentation during the technical session, the proposal concerns “recurring/routine” reports, and excludes “functional” reports such as IEU evaluation reports and compliance reports. The updated proposal now also makes this distinction more explicit. Thank you for highlighting it.

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		once a year. We would welcome a concrete proposal being annexed to the document, listing when and which regular document would be considered during BM or through BBM, building on the presentation made during the technical session. In general, reports and other documents should be more concise, have a 1-pager executive summary with the key issues, and identify clearly concrete questions to the Board and matters requiring a board decision, where appropriate.	A comprehensive list of the regular reporting requirements requires careful assessment of years of accumulated reporting mandates because the production of a single document may respond to several different mandates. The proposed draft decision requests the production of the list for consideration by the Board.
3.2 Measures proposed for consideration at B.46 ADVISERS IN COMMITTEES (and other inputs on committees)	African States	Advisers: The key question regarding advisers, as proposed in the draft document, is not whether the Board wishes to accord advisers a status beyond the definition in the RoP and the Board-approved guidelines on advisers, but whether discussing the proposed measure is legal. In our view, we have no legal basis to consider this matter. The Governing Instrument does not afford or envisage any role for advisers in the decision-making of the Board. Nor do GI paragraphs 9-12 provide that any person not nominated via their regional group as a Board or Alternate Board member can be in a decision-making role. Historically, the role of advisers was an innovative feature of the transition committee, which was then applied to Board proceedings. The specific nature of advisers in supporting Board decision-making is recognized in B.23/03, but this does not normalize the role to committees. Having established there is no legal basis for advisers as representatives in committees, we see no value in re-opening a closed discussion on the legislative role of advisers. The notion that the Fund/or Board needs to evolve has no legal basis, and we do not subscribe to any interpretation that GI paragraph	The limitations on committee membership as set out in the Rules of Procedure is recognized. Following consultations, the Co-Chairs have decided to withdraw the proposal on Advisers' roles in committees. The updated proposal promotes practical ways to enhance advisers' participation within the existing framework.

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		32 allows the Board to evolve beyond the operational dimension of the Fund. We place on record that if the CCs insist on a legal interpretation that assigns a more formal and legal role to advisers in the Board's deliberations, we will first raise a procedural "point of order" under paragraph 12 of the Rules of Procedure, and seek a ruling from the CCs regarding the legality of such an action. We will respond to the CCs' ruling as described in para 12, noting that the B.23-3 procedures do not cover an objection to a CCs ruling. This, however, does not mean we see no value in discussing non-legislative options for the roles of adviser in the work of committees, while respecting their mandates to support Board decision-making.	The role of advisers is not recognized in the procedures adopted through Decision B.23/03. Practice has developed to allow advisers to join "small group" discussion seeking to build or exhaust consensus alongside or on behalf of the members they represent. We take note of the position. Following consultations, the Co-Chairs have decided to withdraw the proposal on Advisers' roles in committees. The updated proposal promotes practical ways to enhance advisers' participation within the existing framework.
	Canada / Belgium	Specifically, we support: [...] • More active participation and representation by Board seat advisors to advance the Funds' work, including at Committees.	Thank you, your comment is noted. Following consultations, the Co-Chairs have decided to withdraw the proposal on Advisers' roles in committees. The updated proposal promotes practical ways to enhance advisers' participation within the existing framework.
	Germany	• In principle, we support expanding the role of advisers in committee meetings. This is already common practice in other funds, such as the Climate Investment Funds. Advisers often bring valuable technical expertise and can engage in	Thank you, your comment is noted. However, the governance structure in the various funds is different and comparison with any other entity should account for those considerations.

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		detailed discussions that enrich the committee's deliberations. - Participation should, however, remain at the request of the relevant Board member or Alternate Board member. The decision whether to invite an adviser should remain with them, and an adviser should not replace a Board member or Alternate Board member unless their participation has been explicitly and formally requested. With this safeguard, we see no fundamental difficulty with the proposed arrangement. - Furthermore, we would like to propose a less cumbersome procedure for cases in which a Board member wishes to replace their Alternate, or vice versa, at a committee meeting. Currently, the seat concerned has to submit a formal request to the Secretariat, which then informs the entire Board about the replacement, even if it is for just one meeting. We would ask the Secretariat to develop less bureaucratic options.	Following consultations, the Co-Chairs have decided to withdraw the proposal on Advisers' roles in committees. The updated proposal promotes practical ways to enhance advisers' participation within the existing framework.
	Japan	Against that background, we would like to offer a few reflections on the specific proposal contained in the paper. Japan is open to exploring a greater role for Board committees as part of broader efforts to enhance Board effectiveness and improve the use of Board time. In order to maximize the benefits of this approach, it may be useful to further clarify the respective roles of committees and the full Board, and to ensure that committee processes are designed to streamline, rather than duplicate, Board deliberations.	According to paragraph 31 of the Rules of Procedure "Committees shall assist the Board in its decision-making, and shall exercise any delegated authority under the overall authority and direction of the Board, which may revoke such delegated authority under the same procedures in place for the original delegation of authority. (...)" Although conceivably the Board may delegate any part of its authority to a Board committee, in practice Board committees are largely advisory bodies, with the ultimate decision on matters under committee purview being with the Board.

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			In very few instances, the Board has delegated decision-making authority to a committee, for example to the Performance Oversight Committee (POC) in matters of performance-related salary increase for Board-appointed officials (decision B.BM-2020/04) and to the Ethics and Audit Committee for the adoption of certain implementing instruments under Board-approved policies (decisions B.23/15(c) and B.BM-2021/22). The Risk and Finance Committee (RFC) is carrying out delegated monitoring and oversight roles on behalf of the Board (decision B.45/01(d)).
	Switzerland / Finland	We also agree with the proposed amendment to the rules of procedures to allow Board members to be represented by their advisor at committee meetings, in their absence. This helps achieve quorum and supports the overall efficiency of committees. Every board member should be free to decide whether or not to take advantage of such an arrangement. It also recognizes the value and technical expertise of advisers, as well as the specific circumstances of seats representing several countries or ministries.	Thank you, your comment is noted. Following consultations, the Co-Chairs have decided to withdraw the proposal on Advisers' roles in committees. The updated proposal promotes practical ways to enhance advisers' participation within the existing framework.
	United Kingdom	We also seek [...] • A comprehensive list of current Board mandates that are delegated to Committees for decision.	A comprehensive list of committee mandates can be found at annex to the updated Board workplan last issued under GCF/B.44/Inf.06/REV1 .
3.3 Areas for future work	Switzerland / Finland	We appreciate that areas for future work are identified. We call in particular to hold virtual Board meetings, and to further develop a one-Board spirit, e.g. by having more dialogues with both constituencies ahead of meetings rather than separately. We underline the importance of	Thank you, your comment is noted.

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		respecting the 21-day deadline for the circulation of documents, and circulating them as soon as they are ready. Green light from the co-chairs should not be necessary if there are no major contentious issues. We also encourage further prioritizing policy reforms, focusing on 2-3 per Board meeting. Finally, we consider the growing duration of Board meetings to be an issue, as the climate finance calendar is already very packed.	
Annex I: draft decision			
	Canada / Belgium	[...] In addition, we would welcome regular reviews of Board effectiveness, to determine the level of effectiveness and impact and to suggest future actions. Future Board retreats could also be considered, though this should not be assumed as standard practice moving forward.	Thank you, your comment is noted. The draft decision text contains language on continued mandate on effectiveness, with the Co-Chairs continuing to be in the lead as this is a Board process.
	Switzerland / Finland	The proposed decision text should include all the low hanging fruits which can be implemented immediately.	Thank you, your comment is noted.
	Italy	The only area where we would encourage greater caution relates to the proposal to institutionalize additional informal engagement opportunities and periodic Board retreats. While we recognize the value of informal exchanges in building trust and mutual understanding, such activities should, in our view: 1. Be organized, whenever possible, in conjunction with formal Board meetings, in order to reduce costs, travel requirements and associated emissions; and 2. Replace, rather than add to, the overall number of mission days required from Board	Thank you, your comment is noted. The draft decision text contains language on continued mandate on effectiveness, with the Co-Chairs continuing to be in the lead as this is a Board process. Concrete retreats will necessitate specific Board decisions including on the dates and scope of such retreats.

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		members and advisers, taking advantage of the efficiencies generated by the other measures proposed in this paper. For these reasons, Italy supports the overall direction of the document and looks forward to constructive discussions at B.46 with a view to agreeing on a meaningful package of reforms that strengthens the effectiveness, responsiveness and strategic focus of the Board.	
	United Kingdom	We also seek [...] • Confirmation (or inclusion within the Board paper) that the Secretariat has an ongoing mandate to propose additional changes to support Board Effectiveness, including related to all areas outlined within this paper, to the Board.	The draft decision text contains language on continued mandate on effectiveness, with the Co-Chairs continuing to be in the lead as this is a Board process.

Table 2: Response matrix for comments from the GCF Observers Network

Document Issue/Provision	Comment	Secretariat Response
General Comments	The discussion about Board effectiveness is an ongoing and important one. However, we are deeply concerned that this paper and proposal, in laying out efforts to make the Board proceedings more effective, and defining effectiveness primarily by the characteristic of speed, is intending to take procedural and due diligence shortcuts. In particular, these reflections and propositions are not taking into consideration what the proposed changes mean for transparency and accountability to the wider public in general, and for the opportunity for observers, in particular civil society, Indigenous Peoples and local communities, to be adequately informed, let alone have their voices heard in Board proceedings with direct impact on their lives and livelihoods, especially with respect to some funding decisions and accreditation considerations. This complete absence of awareness of the important role of the public and observers in the paper's discussion extends in particular also to the role of the Active Observers in Board meetings and related proceedings. With the proposed changes, including the consideration of some funding proposals and all accreditation requests to be presented for Board consideration as decisions between Board meetings (BBMs), no efforts or intentionality is presented to suggest robust processes for public review and accountability will be created as key to the operationalization of Board effectiveness. There is no indication that Active Observers would be adequately involved in timely notification of BBMs, enabling technical review and commenting processes by observers, particularly on the funding and accreditation considerations in a BBM process. In current proceedings, where those Board decisions are exclusively taken at Board meetings, several elements are present that are not provided or accounted for in the proposal, including the prior document release of full funding proposals and accreditation applications (mandated at 21 days before a Board meeting), and the responses from project proponents following written submissions and a technical session with AO participation released prior to the Board's decision-making. The predictability and lead time between Board meetings is also a key feature, allowing civil society and Indigenous Peoples to plan to coordinate their networks' time around document review. This raises serious transparency and accountability questions and concerns, noting that effectiveness and efficiency should work hand-in-hand with transparency and accountability:	Thank you for these comments. The Secretariat would like to clarify that the proposal to consider proposals via BBMs was never intended to be a closed process. Whilst not explicitly expressed, the intention was for the Active Observers be involved throughout the process, akin to the Active Observers' involvement for proposals presented at Board meetings. The amended proposal includes sharing of the proposals with Observers in the same fashion as the no-objection procedure (Decision B.32/11, para. (b), Annex XI) already does, and collecting and sharing the feedback. Active Observers are already invited to take part in technical sessions. Although the draft document did not expressly reference the Information Disclosure Policy, the policy remains applicable, as GCF operations continue to be governed by all relevant Board-approved policies, including the Information Disclosure Policy.

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	“The Fund will operate in a transparent and accountable manner guided by efficiency and effectiveness” is a key statement in para. 3 of the Governing Instrument. Effectiveness must also not be shortsightedly defined by speed alone, but how quickly money flows out of the GCF’s coffers to communities, as flows that lack due diligence risk greater harm to those communities; abridge their rights of participation and in the case of Indigenous Peoples, compound the oftenlacking Free, Prior, and Informed Consent; and at best, risk inefficiency through lack of scrutiny contributing to inadequate design. These proposals, if adopted too quickly at B.46 as is, without the consideration and design of appropriate and robust channels for information-sharing from the Secretariat; commenting from civil society and Indigenous Peoples to Board members, alternates, and advisors on the decisions before them; and public recording and accountability of considerations informing decisions, not only notifications of decision-outcomes, undermine effectiveness. These measures are poised to short-change in particular those people and communities that the GCF is mandated to serve, as an unclear and shortened procedure deprives affected communities of the right to have their voices and concerns, particularly with respect to funding proposals, heard and taken into account. These concerns should also be able to be heard in a forum that allows for discussion and accountability. The value of discussion in this paper is not highlighted - effectiveness should indeed be predicated on new information and analyses influencing considerations and outcomes; otherwise, it is merely efficiency, and not effectiveness, being achieved. There should be value in sharing views on concerns, as well as hearing responses from those with different insights as well as actors with authority regarding those concerns. The case of funding proposals is particularly relevant here: in bilaterals, AEs often cite, even when proposals are approved, that they are taking on board comments made by the GCF observer network of civil society, Indigenous Peoples, and local communities; furthermore, their on-floor responses and assertions are key to accountability. Of course, decisions between-Board meetings could be designed to reflect key features of transparency and accountability. Our concern, however, is that the proposal does not appear to have undertaken the exercise nor has demonstrated how the proposed alternative process would preserve the same opportunities for scrutiny, participation and accountability that are currently afforded at formal Board meetings.	

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	Indeed, this document does not once reference the Information Disclosure Policy, which should be a guiding policy in designing new processes for Board decision-making in particular. Again, Board effectiveness cannot be achieved without being in alignment with the entirety of the GCF's operations as guided by active policies. Another previously-approved Board document that is indeed deeply relevant here, and makes only a minor appearance, is the Rules of Procedure of the Board. These Rules of Procedure have not been amended since 2016, and thus such changes should automatically be afforded additional scrutiny, in respect to the history of the Board and the informed deliberations it has had over the years, noting the Board's reluctance to change foundational documents. A single Board-meeting cycle (B.45 to B.46) to consider and adopt any changes to the Rules of Procedure is thus rushed, while the proposed change, to para. 30 only, does not include adequate background information regarding the analysis that this is the only change merited by this suite of "effectiveness" proposals. In particular, the additions to the circumstances under which between-board-meeting decisions can be considered are major. While para. 40 of this background document acknowledges that the Board adopted "Guidelines to determine in which cases decisions without a Board meeting may be requested" in 2022, there is no analysis provided to showcase how it was decided at what point those guidelines could be further amended without the text of ROP para. 41 becoming meaningless with regard to an "extraordinary basis." Such an analysis of this entire proposed decision with regard to the ROP should be provided to ensure the Board is not undermining its authority, responsibilities, and functions. The proposed significant changes to the way the Board operates its decision-making and funding through BBM-approaches are also presented without a required review and consideration of the GCF Board's history on developing and agreeing on decision-making between meetings. Indeed, the paper and its annexes are completely silent on recounting the history of the approach, which was only adopted, recognizing the shortcomings of the approach through its passive noobjection procedure (where Board members' silence during a usually very narrow time window is taken as consent instead of an active in-person discussion and engagement among all Board members), after a clear agreement and guarantee that it	The Board may always decide to amend its decisions or guidelines adopted by it, including without a "review" clause. Analysis of the past is often useful, but the proposal is also made with the very near-future in mind, including, notably, anticipated increased programming. Over the past 12/13 years (i.e. both before and after the adoption of the B.BM guidelines), decisions without a Board meeting have been adopted in respect of a wide variety of subjects covering a similarly wide variety of areas of work, from adopting policies to approving audited financial statements.

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	would be not used for decision-making on funding decisions. Given capacity-constraints among many developing country Board members, who have to fulfill a multitude of functions within the climate regime without the same kind of support that developed country colleagues routinely enjoy, there were significant concerns then, which continue to be valid to this day, that this might in fact also undermine the opportunity for developing country Board members, whose countries will host GCF funded projects and programmes implemented by GCF accredited entities, to give proposals their full consideration and consent. The record of Board meetings is not incidental, and it should be part of the Secretariat's purview, especially here, as one proposal is providing decision-focused documents, to provide relevant historical information to inform deliberation. This is indeed a matter of efficiency and effectiveness as well, to ensure new decisions build on the foundations of previous decisions, and either advance the topic with new information or affirm previous conclusions, rather than inefficiently taking up the Board's time in rehashing previously-held discussions.	Some of these clearly go to business / operational continuity (such as appointment of members to committees, members to panels etc). Others such as the routine B.BM decisions relating to accreditation of observer organizations were still considered by consecutive Co-Chairs to meet the extraordinary basis threshold set in paragraph 41 of the ROP. This is despite webcasting and the ability of observer organizations (who are not in the Boardroom) to follow Board proceedings even without being accredited. If accreditation of observer organizations meets the threshold for extraordinary basis, it is arguable that accreditation of entities between meetings, and approval of funding proposals, both of which would accelerate access to GCF resources, project implementation, and the achievement of climate results, should also be considered to meet the threshold in paragraph 41.
Document - Introduction	Para. 5 - the retreat on Board effectiveness held in Dushanbe in the lead-up to the B.45 meeting did not formally include/invite the Active Observers, although the CSO Active Observer Team has much experience and knowledge to contribute on the ways the Board meetings and proceedings are working. We would argue that a consideration of effectiveness of the Board must consider and strengthen, not weaken, the meaningful and effective participation of Active Observers in Board meetings and related proceedings. Para. 6 - we seek clarity if all Board members had an opportunity to be heard; at B.45, not all Board members were present. Thus, the findings and recommendations drawn from	Thank you for these comments. The Dushanbe retreat was indeed an informal opportunity for Board members, alternate members and advisers to exchange views and brainstorm ideas on how to increase Board effectiveness, consistent with the mandates established in decisions B.42–B.44. The retreat was intended to inform, rather than represent the formal views or consensus of the entire Board.

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	both the survey and the workshop might not reflect the opinions of the entire Board membership. In particular, clarity is needed if and how Alternate Board members were included in the firm's assessment process, as alternate members take on roles as main representatives of their constituencies for example through their appointment to Board committees, independent of the main member. Also, while the outcome report was circulated to the Board, it should also be made public. This background paper is used as a justification for a proposal for a quite significant shift in the way the Board conducts its decision-making functions, and the GCF has a longstanding Information Disclosure Policy operating under the principle of Maximum Access to Information.	The retreat was preceded by a survey and opportunities for personal engagement (one-to-one interviews) with Board members. Participation was voluntary and the report to the Board featured information and breakdown on participation. The report from the retreat itself is not for consideration by the Board, it is a snapshot of an intimate process the Board had not opened to the public. What is presented and subject to the IDP is the Co-Chairs' synthesized key takeaways (which is not an exhaustive list of all matters which may have been raised or discussed at the retreat) and the follow-up actions they propose.
Document – Key takeaways from the Board retreat	Para. 11 a) - prioritization cannot mean letting go of mandates, for example, as we enter the sixth year of delay on updating the GCF's interim Environmental and Social Safeguards. Prioritization must be a transparent process. There have to be decisions not to return to previous mandates, not simply allowing a backlog to accrue. b) - reduced reporting could also seriously undermine the oversight and accountability function of the Board; even if full and adequate reporting might not be considered by the Board in meetings (or taken note of), such full reporting should still be made available for the record and also the broader public as a matter of transparency and accountability. c) - with the limitations of the current guidelines on observer participation (with a review in unclear stages of discourse, consultation and development), which are completely silent on and do not address an involvement of Active Observers in between Board meetings or related proceedings, moving more decisions to BBMs would likely mean significantly curtailing and weakening the role and function of the Active Observers and depriving them	Thank you for these comments. The proposal to circulate regular reports to the Board outside Board meetings does not undermine the oversight and accountability function of the Board. The Board will continue to receive relevant information through the reports circulated outside Board meetings and the Board retains the ability to request that a matter be brought to a formal meeting for Board discussion. Kindly note that a substantive part of regular reporting is made for areas where no specific requirement has been formulated by the Board. The Rules of Procedure provide a specific publication schedule only for those documents which relate to items on the provisional agenda. Reports could therefore be published on the GCF website at any time

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	of the ability to involve and inform rightsholders, as well as curtail the broader public's right to know and engage. This might also run afoul of the mandate for pro-active information disclosure under the Information Disclosure Policy and might limit the fulfillment of the stipulations on project related ESS information disclosure laid out in the GCF's Environmental and Social Policy (ESP). d) - in considering the matter of greater delegation of "appropriate matters", the interest of the public (right to know) and the principles of transparency and accountability are to be considered to determine what's appropriate. e) - the call for more focused Board documentation does not mean abdication of providing important annexes to (presumably shortened) documents with analysis, reviews and reports mentioned. To the extent that at main document is "decision-focused", it still must be accompanied with the underpinning information guiding recommended decision options. Para. 12 a) - this provision of information is a requirement under the IDP - which should be considered and mentioned in the context of discussion Board effectiveness. Thus, this is a matter of compliance rather than an issue of improvement of Board effectiveness (with the compliance resting on the Secretariat's timely delivery of the final Board papers to the Board and wider public). f) we are wary of the proposal to consolidate selected reporting streams, as recent consolidation efforts have resulted in a lack of data being provided – such as regular reporting on the percentage of funding flowing to DAEs. There must be clear indications and reporting on where information that was removed for "consolidation" can be found alternatively (on online dashboard, other publication, etc.) Para. 14 - the goal of providing "proportionate information" is not clear about who decides what proportionate information is – which will be in most instances the Secretariat and not the Board. As the Secretariat is not a neutral actor, but with interests of its own (for	between Board meetings, without impact on their content or format. We agree.

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	example, in pushing for certain policy changes), such a determination might be leading rather than broadly informative for the Board to consider all options. Para. 16 The suggestion to propose certain funding proposals (up to certain defined criteria and thresholds) and all accreditation matters be considered for BBM runs counter to the historic understanding and agreement made between developed and developing country Board members when the BBM process was approved that it would EXPLICITLY NOT be used for funding decisions, but that those could only be made by the Board in Board meetings. For the current cases in which BBMs are allowed, the Active Observers receive notifications, but only for BBMs that are not limited distribution (with about half of current BBMs designated as such); there is, however, no clear procedure for AO involvement or their ability have their comments shared with Board members* before the no-objection period runs out; if this is adopted, it would significantly curtail the AOs' ability to bring community concerns on funding or accreditation proposals to the attention of Board members. *Note, the AOs are not given access to the Board portal, to post any information there, nor even access to the Board members, alternates, and advisors' email lists. The e-mail list the CSO AOs use for sharing comments on any Board proceedings does not cover everyone it should, as it is compiled and updated through bilaterals and publicly available information. Para.17 - the discussion about transitioning regular operational reporting out publication outside of formal Board meetings raises concerns, as it is not only clear how such information would be shared (through notification) with Active Observers and the public, but it would deprive observers, as well as the Board also, of the ability to comment and review. Public deliberation and consideration of these reports is an important element of the Board's role and ensures that any processes of prioritization are undertaken within an appropriate contextual understanding of the GCF's current operations, challenges, and constraints. Maintaining some larger-level ability to consider, reflect, and question the	

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	Secretariat on the results and outcomes of its day-to-day work is a necessary part of the Board's oversight and quality assurance and accountability for Fund operations. Furthermore, it ensures that the suite of "decision-focused" narrow documents do not overlook the big picture and strategic direction of the Fund's workings. This is thus an important stocktaking function that needs to be maintained, ensuring the Board's oversight is not compromised.	
Document – Section 2.4	Potential enhancements to Board committees should be considered as part of the two-year review of the new committee structure; this could then also include a consideration of allowing the selected participation of Active Observers in Board committee proceedings at the invitation of the Committee Co-chairs, and with the consent/no-objection of all committee members. Para 19 a) - the participation as advisers in the absence of committee members for information sharing and discussion sharing purposes could certainly be helpful; however, such engagement should not be a replacement for an assigned Board member for quorum purposes. Advisers should not substitute board members in decision-making. It is Board members and alternate Board members, not advisers, who through a decision of the Board serve in committees; this is a matter of Board member accountability, and would require a change of the Board's current Rules of Procedure, which should not be taken lightly. d) - the necessity and practicality of additional ad hoc committees should be considered, as this might not help to improve Board effectiveness, but instead lead to more Board fragmented consideration of issues (with commensurate challenges in receiving quorum for more meetings of more Board committees). Additionally, if such a proposal were advanced, clarity on specific criteria to be considered in establishing ad hoc committees and other focused mechanisms must be provided. Para. 25 - while more opportunities for informal interaction across the Board constituencies as a matter of strengthening relationships and improving mutual understanding are welcome, Board composition is perpetually changing and shifting, and	

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	trust is often built through personal relationships. In addition, in particular the trust between the two Board constituencies, with often competing priorities and differing interests (such as on role of concessionality, role of private sector), must be built through a reliable and transparent process (documents being delivered on time; documents not pre-judging outcomes, clarity on the respective roles and responsibilities for drafting and finalizing Board documents, etc.)	
Document – Section 3 – Co- Chairs’ Proposal	Para. 35 (i) - Note that putting more information and improving the Board portal will not improve the effectiveness of the participation in Board matters for AOs or observers more widely, as they do not have access to information shared only via the Board portal. Maximum public accountability and pro-active information disclosure in line with the IDP must guide any revisions to the Board information flow. (iv) - to the extent that other information sessions are used, this must likewise consider the implications for the participation of and information sharing with the AOs (such as thru active notification) to allow them to fulfill their wider information sharing mandate to observers and rightsholders. Para. 37: Informal engagement by the Co-Chairs should be intentional and inclusive. It could take place during key international UNFCCC meetings and include the GCF observer observer network of civil society, Indigenous Peoples, and local communities network, as well as the Indigenous Peoples Advisory Group—particularly on matters relating to Indigenous Peoples. These engagements, if well-planned in advance, could be valuable channels to strengthen relationships and mutual understanding, surface issues ahead of formal Board meetings, and support continuity and constructive dialogue. Para. 38: the observer network of the civil society, Indigenous Peoples, and local communities, as well as the Indigenous Peoples has been and continues to offer their network and expertise in these onboarding sessions. Note that many of the members of the network have been engaging longer than many board members of secretariat- they have both institutional memory and a wide range of expertise and network.	

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	Para. 40 - The proposal to expand the BBM process and absorb more regular, routine functions then makes a mockery of the "extraordinary basis" in the Rules of Procedure of the Board (ROP), making it "ordinary" -- this contravenes the decision and the original understanding of the BBM procedure. Further adding more regular circumstances to the "Guidelines to determine in which cases decisions without a Board meeting may be requested" (adopted in 2022), cannot simply be a process that happens every few years without careful consideration of whether this contradicts the current Rules and might require the opening up the ROP for further changes. Para. 42 - Expanding of BBM guidelines to cover any accreditation proposals and certain funding proposals might contravene with the mandate of the Board and their authority to convene and conduct BMs. It is unclear if "any accreditation proposals" means all accreditation proposals. If none would be publicly introduced anymore, the core concern and question is how the information/notification to the public will be handled and if there is an opportunity for Active Observers to make comments on the record. For funding proposals, the same issues of AO exclusion/public exclusion on commenting etc. would apply. Para. 43 - As shared in our overarching comments, the eligible proposal review includes no mention of public notification, related ESS disclosure, inclusion of AOs, technical sessions on those funding proposals, or opportunities to comment on the record, and what such a record would be outside the webcast (merely the meeting report?). Para. 46 - The Board being presented with matters for actual consideration and even decision as part of regular reporting is actually a concern, with the drafting and presentation of these reports sometimes hiding substantive decisions that are then effectively undertaken by the Secretariat given the noting of the report. Proposals for decision should be made explicitly, and can be under existing or tailored agenda items, but the decisions themselves should be clear in the decision text, ensuring authority remains with the Board. Para. 47 - The idea of publication to the Board ignores completely that these reports must also be published to the public, as they are with current Board proceedings, and in line with	Successive pairs of Co-Chairs have put forward hundreds of proposals for decisions without a Board meeting before the B.32 Guidelines on a vast range of matters. Even after the adoption of the B.32 Guidelines, proposals such as those for the accreditation of observer organizations made were included in the list of instances in which a decision without a meeting could be proposed, even if observer organizations could, arguably, follow Board proceedings online, even if they miss an accreditation cycle. "Any" accreditation proposal means that there is no eligibility criteria for proposals to be considered intersessionally. It does not mean that no proposals would ever be considered at a Board meeting. The introduction of a proposal between meetings is not designed to be a secret process and both accreditation and funding proposals will continue to be considered at Board meetings. We have clarified this in the proposal. Para. 43 - The proposal does not amend any of the rules applicable to the readiness for consideration of a proposal.

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	the Information Disclosure Policy. We need clarification of where they would be published (Board portal or website, and if so, where on the website), and how the history of such documents would be accessed, as they are now with Board meeting webpages. And would there be then notification of the availability of those reports to the wider public/observers? Would there be an expected timeline for their update? Para. 51 - There is an unacknowledged difference here between the participation of Board member advisers to meet quorum and putting in advisors in a full-time Board committee role. And if there is going to be a push for amending the rules of procedure on committees, then also under consideration should be the potential participation of AOs and IPAG representatives.	
Annex I – Draft Decision	This feels like quite a far-reaching draft decision given the lack of specificity on the concerns on transparency, accountability, and Board responsibility and authority detailed above. Several of these decision elements should be postponed until further public discussion is possible; see our comments below. (c) This decision component proposes changing reporting requirements, without specificity on how reporting will be publicly shared, able to be commented on, concerns recorded, or questions answered, and such details cannot be left to be figured out after-the-fact, as operational guidance is often developed without adequate consultation. A clear annex(es) showing exactly which reporting requirements are changing, and detailing where any removed information can be found (in alignment with above comments), must be included for consideration before proposing this decision text. The Rules of Procedure are mentioned in decision-text (g), so their relevance to these overall discussions is acknowledged, although currently their consideration is narrowly defined to the role of advisors in Board committees, without considering the broader implications of the perceived change for other elements of the rules of procedure (and that could include for example also the consideration of the role of active observers in wider Board proceedings beyond narrowly focused on Board meetings). (d) See also our comments on this specific annex on decisions without a Board meeting, where we note that this decision text likely needs to include some reference to the Board's	Regarding SAP, see the comment below.

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	Rules of Procedure, as “extraordinary basis” of para.41 of these rules is effectively being redefined as “ordinary” with these additions. (e) See also our comments on this specific annex, including the inherent contradictions with the currently drafted annex mis-representing the limits to size and risks of acceptable funding proposals under the SAP Policy. (f) See also our comments on this specific annex, which is entirely inadequate in terms of procedure. (g) The proposed adoption of this new paragraph in the Rules of Procedure seems premature. It should only be taken after a deliberation of an informational annex detailing the history of the Rules of Procedure, which have not been changed since 2016, and including the reasons why there is generally, in Board governance, a reluctance to change fundamental documents too frequently and too substantively. (h) This mandate to the co-chairs pre-judges the outcomes and fails in terms of sequencing by proposing the question of whether or not to include advisors, de facto presuming that it is an appropriate step to give advisors full committee membership. Such a move is inappropriate, as first, the implications of replacing Board members and alternates with advisors in this key role, must be considered and debated.	
Annex [X] - Criteria for the eligibility of funding proposals for decision between Board meetings	In the table, the environmental and social risk for funding proposals to be considered between Board meetings is proposed as covering “Category B or Category C, or I-2 or I-3 for intermediated activities, reflecting limited and manageable, or minimal or no, adverse environmental and social risks and impacts.” We object to any consideration of Category B or Intermediation-2 proposals via this channel, especially as the Table also specifies, “The environmental risk category of the funding proposal is consistent with the limits set out in the SAP policy.” This is not correct. The updated SAP Policy, as specified in GCF Decision B.32/5, in Annex IV, paragraph 4(a) limits SAPs to Category C/Intermediation-3 activities. Even within the idea of SAP proposals, inherently Category C. and Intermediation-3, being eligible for between-board-meeting decisions, we have concerns and would be more than amenable to seeing additional restrictions besides greenlighting most SAP proposals. For	Thank you for the comments. To clarify, the proposal for environmental and social risks is to include Category B/I-2 and Category C/I-3 for PAP and Category C/I-3 for SAP in accordance with the SAP Policy, and apologies if this was unclear in the table. The inclusion of projects “consistent with the limits set out in the SAP policy” was intended to future-proof the proposal given the Board’s upcoming review of the SAP Policy in 2027 and its prerogative to make changes to it.

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	instance, options to consider only micro-proposals of USD 10 million or less could be useful, especially as this between-board-meeting approach to funding proposals should be piloted with a specific time to review. With the risks to the Board's authority, oversight function, the right of beneficiaries to have transparent information and accountable processes, at stake, this annex should be proposing a time-limited implementation period and the metrics by which its implementation should be reviewed after a set number of between-board-meeting periods or a set number of proposals considered. We agree with the additional criteria that there should be no funding proposals from PSAA applicants (the PSAA itself being a pilot), and no funding proposals which have conditions proposed by ITAP or by the Secretariat. As above, we would like to see additional bracketed criteria around only micro-proposals, USD 10 million or less. Such a request is an effort to provide Board members with full options and does not imply observer network endorsement of a BBM process for micro-sized SAPs; our concerns stand. Given the other criteria, it does seem strange to have "no first-time single-country funding proposals" as a potential criterion, as the application of the other currently bracketed criteria would mean that the first-time single-country funding proposal would come through with an AE that has previously programmed with the GCF and has executed an FAA/FAAs. This inclusion actually seems to bias against the push to ensure single-country projects are able to be advanced, ensuring each country may be able to benefit when their inclusion in programmatic approaches so often leaves countries without any subprojects.	Micro projects could be considered, although it should be noted there are currently only 7 micro projects in the pipeline for 2027-2028. The comments on PSAA and first-time single-country proposals are well noted.
Annex [X] - Scenarios on the pipeline of projects meeting criteria for decision-making between Board meetings	In the first table, we do note that DAEs are better represented in the SAP pipeline (43%) than the regular proposal pipeline (21%), which could serve as justification for considering between-board-meeting decisions for SAPs and achieving other aligned goals, such as ensuring a greater proportion of funding is flowing to DAEs and more DAEs that have not programmed achieve funding proposals (a USP-2 target that is lagging). We would like to see further data disaggregation in the second table on proposal size, as the micro, small, and medium sizes would be appropriate additional data to inform decision-making, especially if such a decision is for a pilot approach. Proposal size could provide further distinction to enable a narrowly scoped pilot approach, such as for only micro-sized SAPs.	Thank you for the comment. Tables with further disaggregation on proposal size can be provided.

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Annex [X] - Guidelines to Determine in which cases decisions without a Board Meeting may be requested	The Guidelines continue to describe decisions without a Board Meeting as being on an “extraordinary basis.” Given the proposed expansion of eligible matters, there is a need to clarify what is being considered as “extraordinary” in practice. The Guidelines should ensure that between-meeting decisions do not become a routine alternative to formal Board deliberation. As currently proposed, this seems to run counter to the Rules of Procedure. In fact, it seems like this approach would require additional changes to the Rules of Procedure, and while the decision suggests the opening up of those Rules with respect to the capacity and rights of advisors in Committee settings, it does not go into a required change for the designation of BBMs from “may occur on an extraordinary basis when in the judgment of both Co-Chairs, a decision must be taken by the Board that should not be postponed to the next Board meeting” to now proposed regular occurrence. Nor does the background material specify any legal analysis on how and why these changes in between-board-meeting procedures do not require a change to the Rules of Procedure. “Extraordinary” does not seem to cover standard, routine functions such as proposed, including the review of all accreditation proposals, as accreditation is a standard and ongoing function of the GCF. (e) In this proposed addition, funding proposals meeting the Board’s criteria, the proposed eligibility criteria could bring a substantial number of funding proposals into BBMs. Based on the pipeline presented in the annex, this could potentially cover 52 proposals representing USD 1.44 billion under the USD 50 million threshold, or 34 proposals representing USD 666.5 million under the USD 25 million threshold. We are concerned that the financial thresholds could effectively make the size of a proposal the primary determinant of whether it receives full deliberation at a Board meeting. The amount of GCF financing does not necessarily reflect the significance of an FP or whether it raises issues that warrant Board discussion. Our position has been that approving funding proposals should remain outside the BBM process, especially given the lack of consideration here to replicating or substituting adequate transparency and accountability measures through a BBM process. Reviewing and approving funding proposals are core Board decisions and should continue to be considered through formal Board Meetings where BMs have the chance to deliberate, raise concerns and hear different perspectives, including observer organizations representing recipient communities.	See earlier comment regarding “extraordinary basis”

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	(f) The consideration of Accreditation Proposals, which are ultimately decisions on which entities can access the Fund, should be subject to public deliberation, including the consideration of the applicants' track record and capacity, as well as the assessment of the Accreditation Panel. Public viewing is important for transparency and accountability, and for ensuring that Active Observers have an opportunity to raise relevant concerns before accreditation is granted.	
Annex [X] - Procedure for consultation on funding proposals and accreditation proposals ahead of proposing a decision between meetings	These deeply inadequate proposed procedures highlight the issues covered in our overarching comments, as there is no consideration for the role of Active Observers, observers, or the public in receiving notification and being able to question and comment through mechanisms that exist for engagement with the Board and ensuring comments on our record, enabling and fulfilling the expectations of transparency and accountability that are essential to the GCF's operations. No mention is made of the Information Disclosure Policy, with a bracketed option even including blatant non-compliance with this policy. We are not providing specific comments on this procedure as it is clear that it needs to go back to the drawing board completely and be informed by consultation with Active Observers, observers, the Indigenous Peoples Advisory Group.	The annex setting out the Consultation Procedure will be updated accordingly. When the eligible funding proposals and accreditation proposals are circulated to the Board, Active Observers will be notified in a timely manner. During the consultation period, Active Observers may submit questions or comments and, in line with current practice, may be invited to technical or question-and-answer sessions which may be arranged during the consultation period.