

Response to the Danish Organisation Strategy for the Green Climate Fund (2024-2027)

The Danish Family Planning Association (DFPA) appreciates the opportunity to provide inputs and comments to Danish Organization Strategy for the Green Climate Fund (2024-2027).

Overall, we welcome the capital contribution to the Green Climate Fund and see this in line with Denmark's political commitment to provide climate finance. DFPA appreciates that "Strengthening safeguards and gender mainstreaming" is one of the proposed priority results and we also welcome the concrete and relevant priorities for influencing the GCF's work with gender equality and social inclusion.

As an organization we are member of the GCF observer network, and based on consultations with the network we would like to make the following 2 overall inputs:

1: Denmark should be constantly vigilant in how the four priorities might interact, as there are both potential contradictions and missed opportunities in the current formulation of these four priorities:

- For example, a potential contradiction, under Priority 1: enhancing access to GCF resources, the action to "examine the potential for AEs to apply their own policies, while maintaining best practice and substantial equivalence to GCF policies" is outlined. Yet the observer network fears that the application of their own policies only introduces the potential for weakening adherence and obscuring questions of accountability particularly when it comes to environmental and social safeguards and gender, Priority 4. This move for AEs to rely on their own policies is an undeniable and incredible risk for Priority Area 4.
- For example, a missed opportunity, under Priority 2: Enhancing country ownership and efficiency in GCF support, the actions fail to invoke that true country ownership includes recognizing, valuing, and integrating the climate work and expertise of women's organizations and other gender-related groups as well as youth, Indigenous, and disability rights organizations. Actions such as "support a more dynamic and inclusive approach to country ownership and strengthen country engagement throughout origination, approval and implementation" should explicitly include feminist civil society as well as solidify the significance of replicating and scaling up grassroots and community-led work that prioritizes gender equality as proposals are being originated, or rather, co-created. The innovation is in supporting existing gender-just climate action and ensuring true country ownership throughout processes, including under the new Readiness strategy.
- Another potential contraction is in Priority 3, "Promoting innovation and catalysing green financing" with the action, "call on GCF to work with AEs to attract co-investors, including inter-alia the private sector, other climate funds, and development banks, to GCF-funded projects" as de facto creating a co-investment requirement can prioritize financial return on investment instead of ensuring country ownership of priorities and needs, including for adaptation, which is critical for gender equality. Co-financing should not be a requirement for funding.
- A missed opportunity also exists in Priority 3, as MSMEs, which have disproportionate participation by women compared to larger private sector actors, are not mentioned. Directing efforts toward private finance at the base of the pyramid is the innovation needed, and the action "call

on GCF to work with developing countries to strengthen their ability to engage the private sector, particular local private sector, and build supportive investment environments for climate finance" could easily specify MSMEs. Transparency for private sector investment approaches, especially those with a focus on mobilizing finance at scale, through fund-of-fund approaches, when it comes to follow through on gender equality, Indigenous Peoples rights etc. in sub-projects is key. Gender Action Plans for such private sector programs are often very generic.

2: Denmark should recognize the cross-cutting issues of information disclosure, transparency, monitoring and accountability that also accompany many of its proposed actions under its priorities:

- Under Priority 1, "enhanced access to GCF resources," the learning portion of the action to "support the continued increase in the share of DAEs in the AE network, alongside increasing the role of DAEs in GCF programming; and encouraging and facilitating cooperation and learning between IAE and DAEs, as well as DAE peer learning" could be strengthened with accountability for the IAE requirement to provide support to DAEs.
- Under Priority 4, "gender equality and social inclusion," the action to "follow-up at country level on adherence to safeguards related to gender equality and indigenous peoples within GCF-projects" can be served by supporting more timely reporting of annual performance reports, strengthened templates for gender and indigenous rights reporting, disclosure of mid-term evaluations, and insight into what feedback, direction, and support the GCF Secretariat is providing in response to any reports on implementation. Furthermore, there should be more effort on sex-disaggregated data collection. So far, all tracking is on "quality-at-entry" (compliance with requirements to have a project specific gender assessment or gender action plan), but not related to gender outcomes.

DFPA would an organization like to propose the following concrete changes to the draft document:

1: Page 9: In line with the priority results, we suggest including SDG 5 on Gender Equality in the list of SGD goals mentioned in the paragraph:

"The GCF contributes to the realization of most of the 17 SDGs. In view of the GCF's comparative advantages in the multilateral climate and development architecture, Denmark considers the following 8 SDG's particularly pertinent: 1. no poverty; 6. clean water and sanitation; 7. affordable and sustainable energy; 8. decent jobs and economic growth; 11. Sustainable cities and communities, 10. reduced inequalities; 13. climate action, 14. life below waters, and 15. life on land"

2: Page 13: DFPA recommends that one or more points is added to the list of priorities for influencing the GCFs work on gender equality and social inclusion, focusing on the GCF Gender Policy. We recommend the following text: *"urge GCF to conduct an assessment from the unit that is implementing the Gender Policy on its challenges and limitations. An updated Gender Policy must look to have clear definitions in alignment with other policies and ensure coherence with UNFCCC decisions on gender. Furthermore, GFC should prioritize emphasis on reporting, transparency and accountability of gender action plans developed by accredited entities"*.

3: Page 13: (point number 4 under the list of Denmark's priorities for influencing the GCF's work with gender equality and social inclusion): In order to fully operationalize the priority of promoting Gender Equality and to adhere to the Gender Action Plan activity D2 under the Enhanced Lima Work Program that reads "*Raise awareness of the financial and technical support available for promoting the strengthening of gender integration into climate policies, plans, strategies and action, as appropriate, including good practices to facilitate access to climate finance for grass-roots women's organizations and indigenous peoples and local communities*" we recommend that support to women's rights organizations and feminist networks are specifically mentioned as key stakeholders to engage at national and sub-national level, and that specific Gender Equality Plans are included as relevant to incorporate, in parallel to Indigenous Peoples Plans.

4: Page 14: (and subsequently page 30): Propose to specifically mention DFPA as key stakeholder with observer status at GCF in line with IWGIA in the paragraph:

"MFA-KLIMA will continue its engagement and dialogue with Danish civil society organisations (CSO) and networks such as 92-Gruppen, Global Focus including IWGIA who have observer status at GCF and Danish Industry, State of Green. Denmark will in collaboration with representatives of Danish CSO seek to qualify GCF's policies guidelines and monitoring on gender equality and safeguards including for marginalised and most vulnerable people."