

Views of ARGENTINA, BRAZIL AND URUGUAY on guidance to the Green Climate Fund

<i>Elements</i>	<i>Sub-elements</i>	<i>Proposed inputs</i>	<i>To be considered: (1) Commonly by the COP and the CMA or; (2) Specifically by the CMA.</i>	<i>Rationale for the inputs</i>	<i>Source of information / reference</i>
Policies	Incremental and Full Cost Calculation Methodology	Requests the GCF to adopt the incremental and full cost calculation methodology.	To be considered by the COP or CMA , as appropriate	NDAs do not have the capacity to review incremental cost calculations and should not be expected to do so or to validate such calculations.	B.17/10 B.19/06 B.22/02
	Policy on Concessionality	Urges the GCF to adopt the policy on concessionality, and further guidance on concessionality, including the level of concessionality for the public sector. Requests the GCF to adopt a project based concessionality methodology.	To be considered by the COP or CMA , as appropriate	The proposed concessionality approach, its guidelines and application is to be consistent with UNFCCC Decision 9/CP.23 paragraph 7, which “Requests the Board to ensure that all developing country Parties have access to all the financial instruments available through the GCF, in line with the eligibility criteria referred to in the governing instrument and relevant decisions of the COP and to ensure application of the agreed policies of the GCF”.	B.09/04 B.17/10 B.19/06 B.22/02
	Guidelines on Decisions Without a Board meeting	Requests the GCF to adopt, in B.25, the guidelines to determine in which cases decisions without a Board meeting may be requested. Requests the GCF to adopt the guidelines in respect of the implementation of paragraph 43 of the Rules of Procedure of the Board.	To be considered by the COP or CMA , as appropriate	-The guidelines shall include provision to clarify when and how Alternate Board Members act as Board Members. -The guidelines shall include provision in relation to transparency. -The guidelines shall provide clarity in relationship to the status of objections.	GCF Rules of Procedure, paragraph 41-44 B.23/16

<i>Elements</i>	<i>Sub-elements</i>	<i>Proposed inputs</i>	<i>To be considered: (I) Commonly by the COP and the CMA or; (I) Specifically by the CMA.</i>	<i>Rationale for the inputs</i>	<i>Source of information / reference</i>
	<p>Updated Accreditation Framework/ Project-Specific Assessment Approach (PSAA)</p>	<p>Requests/Urges the GCF to prioritize the accreditation of National DAE of countries that still do not have a national DAE accredited, not impeding other countries to present more than one DAE or/and a specific national DAEs for specific types of projects.</p> <p>Requests/Urges the GCF to fully support the project-specific assessment approach in a fit-for-purpose manner.</p>	<p>To be considered by the COP or CMA , as appropriate</p>	<p>ABU supports the approach to prioritize the accreditation of National Direct Access Entities (AE) of countries that still do not have a national DAE, nevertheless this approach cannot impede countries to present more than one DAE for accreditation, especially since countries may want to have specific national DAEs for specific types of projects</p> <p>We support the PSAA as a fast and efficient process, however since this is a pilot scheme we suggest that projects to be implemented under such approach should only be micro and small, in order to minimize the risk of using this new tool.</p> <p>Fees for the PSAA should be lower than those for accreditation.</p>	<p>B.07/02 B.18/04 (a) (b) B.19/13 B.22/16 B.23/05</p>
	<p>Policy Guidelines on Programmatic Approach</p>	<p>Requests/Urges the GCF, as an operating entity of the Financial Mechanism, to promote the use of programmatic approaches, including definition and principles of programme, requirements for submission of programmatic funding proposals and its sub-projects, and process-related aspects for submission and approval.</p> <p>Requests the GCF to adopt the initial guidelines for the programmatic approach.</p>	<p>To be considered by the COP or CMA , as appropriate</p>	<p>The provision of guidance will help various stakeholders including Accredited Entities, National Designated Authorities and Focal Points, Independent Technical Advisory Panel and the Secretariat in developing and assessment of impactful programmes that provide scale to the GCF pipeline.</p>	<p>B.07/03, (e) B.14/07(k)</p>
	<p>GCF Adaptation Support</p>	<p>Highlights the lack of progress on GCF support to adaptation.</p> <p>Requests/Urges the GCF to achieve a balance between adaptation and mitigation support, in line with paragraph 2</p>	<p>To be considered by the COP or CMA , as appropriate</p>	<p>In the context of sustainable development, the Fund has the mandate to promote the paradigm shift towards low emission and climate-resilient development pathways by providing support to developing countries to limit or reduce their GHG emissions and to adapt to the impacts of climate change, taking</p>	<p>Paragraph 2, GI</p>

<i>Elements</i>	<i>Sub-elements</i>	<i>Proposed inputs</i>	<i>To be considered: (1) Commonly by the COP and the CMA or; (1) Specifically by the CMA.</i>	<i>Rationale for the inputs</i>	<i>Source of information / reference</i>
		of the Governing Instrument, on a 50%-50% adaptation mitigation on nominal terms.		into account the needs of those developing countries particularly vulnerable to the adverse effects of climate change.	
	GCF-1	<p>Welcomes the conclusion of the first formal replenishment process of the GCF, and encourages other developed countries to make additional pledges.</p> <p>Notifies with concern that despite pledges made during the Initial Resource Mobilization Period, a number of pledges not only remain unfulfilled, but also no commitment agreements have been signed for the outstanding pledged amount.</p>	To be considered by the COP or CMA , as appropriate	-	
	Grant-Based Resources	<p>Stresses the importance of grant-based resources for developing countries that are particularly vulnerable to the adverse effects of climate change</p> <p>Also stresses that climate action should not lead to increase in debt for developing countries</p>	To be considered by the COP or CMA , as appropriate	-	
	Entities Accreditation	Welcomes that a total of 88 entities were accredited by the GCF, a majority being Direct Access Entities. However, expresses concern that direct access represents only 16% GCF funding.	To be considered by the COP or CMA , as appropriate	-	