

Guidelines in providing the inputs:

- “Sub-elements”: Describe the specific area of the proposed input (e.g. Policies relating to access, gender, environment & social safeguards, etc.);
- “Proposed inputs”: Propose the inputs in draft decision text format;
- “To be considered by”: Choose whether the proposed inputs need to be considered: The COP, the CMA or commonly by both the COP and the CMA;
- “Rationale for the inputs”: Annotate the reason for proposing the inputs, so that the rationale can be clearly understood;
- “Source of information / reference”: Provide reference to the annual reports of the operating entities or decision(s) of Fund Boards.

* **Note:** Please be reminded that guidance is provided not to secretariats of the operating entities or to Parties, but to the respective governing bodies (Board / Council).

Brazil's annotated inputs for the draft guidance to the Green Climate Fund (GCF)

<i>Elements</i>	<i>Sub-elements</i>	<i>Proposed inputs</i>	<i>To be considered by: The COP or the CMA</i>	<i>Rationale for the inputs</i>	<i>Source of information / reference</i>
Policies	Country ownership / no-objection procedure	Urges the Board, in finalizing the updated country ownership guidelines and the no-objection procedure, to maintain the explicit no-objection letter of the relevant national designated authority as a mandatory prerequisite for the consideration and approval of all funding proposals, without exception, irrespective of the financial instrument used, the public or private nature of the proposed activity, the type of accredited entity involved or the access modality. Also urges the Board to ensure that any revisions to the country ownership framework preserve the authority of national designated authorities over country programming, prioritization and endorsement of proposals, including in the context of Secretariat support for project origination and pipeline development; and to ensure that upstream screening, prioritization or resource-allocation practices do not substitute for nationally determined priorities or create alternative pathways that bypass or weaken national decision-making processes.	COP	The GCF is currently reviewing its Country Ownership Guidelines and the No-Objection and Consultation Procedure. The COP has already reaffirmed that the Fund's country-driven approach should be upheld across all policies, procedures and operational modalities, in line with nationally determined priorities and nationally led programming, and has recognized the central role of national designated authorities as focal points. Further guidance is warranted to ensure that efforts to enhance efficiency, flexibility or access do not result in differentiated or weakened application of the no-objection requirement across financial instruments, private-sector operations or other modalities. Formal national endorsement should remain a clear and uniform safeguard of country ownership and national accountability. As the Secretariat adopts a more proactive role in project origination, pipeline management and the allocation of project development support, it is important to distinguish between supporting countries in translating their priorities into fundable proposals and determining or filtering those priorities on their behalf. This is particularly relevant for private sector and multi-country programmes that may originate outside national programming processes.	Fifteenth Report of the GCF to the COP, Table 1, response to decision 2/CP.30, para. 11, p. 17; decision B.44/04 and ongoing Board consideration of the Country Ownership Guidelines and the No-Objection and Consultation Procedure.
Policies	Access / operational efficiency	Urges the Board to ensure that measures aimed at accelerating project appraisal, simplifying access and increasing operational efficiency do not weaken country ownership, the authority of national designated authorities or national procedures for the prioritization and endorsement of climate finance proposals.	COP	The GCF has significantly accelerated project appraisal under the Efficient GCF initiative, including through a target of completing appraisal within nine months or less. While these efforts are welcome, efficiency gains should not come at the expense of country ownership, national oversight or the role of national designated authorities in prioritizing and endorsing proposals.	Fifteenth Report of the GCF to the COP, Table 1, response to decision 2/CP.30, paras. 8-9, pp. 16-17; Executive summary, paras. 13-14, pp. 6-7.
Policies	Country platforms /	Reaffirms that country platforms and other national coordination mechanisms supported by the Fund should be	COP	The GCF is increasingly supporting country platforms as mechanisms for coordinating climate finance and investment	Fifteenth Report of the GCF to the COP,

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	national coordination	country-led, established and governed according to national circumstances and priorities, and urges the Board to ensure that such platforms remain voluntary and complementary to GCF country programmes and other country-led programming arrangements. Country platforms should not constitute a formal or de facto condition for accessing GCF resources, they should not create additional procedural requirements for recipient countries, nor affect the authority of national designated authorities over country programming, prioritization and project endorsement.		pipelines. As this approach expands, guidance from the COP can help ensure that country platforms remain voluntary, country-led coordination instruments and do not evolve into an additional layer of access requirements or substitute existing national governance arrangements.	Executive summary, para. 19, p. 10; section 3.1.1, para. 12(a)(ii), p. 22.
Policies	Data transparency and country-level portfolio monitoring	Urges the Board to strengthen the Fund's data architecture and transparency by ensuring that national designated authorities and focal points have timely access to structured, machine-readable and country-disaggregated information on GCF finance, projects and subprojects, and expected and achieved results, including, where available and appropriate, disaggregation by project, sector, geographic area and beneficiary group; and to promote consistency and comparability of aggregated results across the Fund's results management frameworks and, where feasible, with those of other multilateral climate funds; and requests the Board to report on measures taken to enhance country-level access to implementation and results information, including for multi-country projects and programmes.	COP	The GCF collects results information at the project and programme level through annual performance reports. However, this information is not systematically made available to national designated authorities and focal points in structured and machine-readable formats and, for multi-country projects and programmes, financial, implementation and results data are not necessarily disaggregated by country. This limits the ability of national designated authorities and focal points to monitor the full portfolio of GCF-supported activities and results in their countries. Addressing these gaps would strengthen country ownership, national portfolio oversight and evidence-based programming. The ongoing review of the GCF results management framework provides an opportunity to improve the accessibility, country-level disaggregation, coherence and interoperability of results data, including through the Fund's existing application programming interface or other suitable machine-readable arrangements.	Fifteenth Report of the GCF to the COP, section 4.4.3, paras. 112–117, pp. 49–50, including the review of the Integrated Results Management Framework.
Policies	Artificial intelligence and institutional accountability	Urges the Board to ensure that the use of artificial intelligence across the Fund's operations is governed by appropriate standards for human oversight and accountability, validation, transparency, auditability, data confidentiality and the protection of information provided by countries and accredited entities, and that such tools support, but do not substitute for, accountable professional judgement or the decision-making responsibilities established under the Fund's policies.	COP	The GCF is increasingly integrating artificial intelligence into its operations, including project reporting, impact-data validation, evaluation, risk management and portfolio monitoring. While these tools may contribute to operational efficiency and data quality, their use in functions that inform project appraisal, monitoring and institutional decision-making requires clear safeguards regarding human accountability, validation, transparency, confidentiality and the management of errors. Guidance from the COP would help ensure that the adoption of these tools does not introduce opaque or automated decision-making processes or alter the rights and responsibilities of countries and other actors under the Fund's policies.	Fifteenth Report of the GCF to the COP, section 4.4.3, para. 117(f), pp. 50–51, and section 4.4.5, para. 125, pp. 52–53.

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Programme priorities	Direct access	Urges the Board to accelerate concrete progress in increasing the share of GCF resources programmed and implemented through direct access entities and to improve readiness and project preparation support to strengthen the capacity of such entities to move from accreditation to the approval and implementation of country-driven funding proposals.	COP	Progress in increasing the number of direct access entities with approved funding proposals remains below the ambition set under the GCF Strategic Plan. Additional support is needed to ensure that direct access entities can move beyond accreditation and develop, secure approval for and implement high-quality country-driven projects.	Fifteenth Report of the GCF to the COP, Table 1, response to decision 2/CP.30, paras. 3-4, pp. 14-15; USP-2 target T2, p. 21; section 3.1.1(a)(iv), p. 23.
Programme priorities	Belém Technology Implementation Programme	Encourages the Board of the Green Climate Fund to support the implementation of the Belém Technology Implementation Programme, within its mandate.	CMA	Rationale for the inputs: The CMA established the BTIP to strengthen implementation of the technology priorities of developing countries and invited the operating entities of the Financial Mechanism to support its implementation within their mandates. The proposed guidance would establish an explicit link between the GCF and implementation of the Programme while preserving the Fund's country-driven approach and mandate.	Decision 18/CMA.7, paras. 1, 8 and 18
Policies	Regional presence	Encourages the Board to ensure that the operationalization of the GCF's regional presence enhances responsiveness to the needs of developing countries, strengthens direct access, promotes multilingual engagement, and reinforces country ownership, and requests the Board to monitor its effective implementation without undue delay.	COP and CMA	The Board has selected Panama City as the host of the regional office for Latin America and the Caribbean. The report states that regional presence is intended to improve responsiveness and engagement with NDAs, AEs and regional partners, and that the Board requested effectiveness indicators and cost reporting. Guidance can reinforce a country-serving and accountable implementation model.	Fifteenth report, executive summary, para. 3; paras. 13-17; table 1, response to decision 2/CP.30, para. 12.
Policies	Effective simplification of access	Urges the Board to ensure that measures to improve access and efficiency result in demonstrable reductions in procedural burdens and end-to-end processing times, particularly for direct access entities and first-time applicants, while maintaining appropriate fiduciary, environmental and social safeguards and accountability standards.	COP and CMA	The report records faster appraisal after formal submission, but average time from concept note submission to Board approval remained 37.8 months for SAP proposals and 34.1 months for regular proposals. The independent evaluation found that the SAP has become operationally indistinguishable from the regular approval process. Guidance should focus on genuine process simplification rather than only accelerated internal appraisal.	Fifteenth report, paras. 13, 145-153 and 239-240; table 1, responses to decision 2/CP.30, paras. 3, 8 and 9.

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Programme priorities	Adaptation finance and NAP implementation	Recalling paragraph 53 of the Mutirão Decision (CMA.7), urges the Board to significantly scale up grant-based and highly concessional finance for country-driven adaptation action in developing countries, including for the implementation of priorities identified in national adaptation plans, and to strengthen support for translating adaptation planning into project pipelines and implementation at national, subnational and local levels, including through readiness and project preparation support.	COP and CMA	The GCF portfolio has reached balance between adaptation and mitigation in nominal terms and allocates 60.14 per cent to adaptation in grant-equivalent terms. Nevertheless, the report identifies continuing challenges in scaling adaptation finance and strengthening DAE access. It also notes that support is increasingly intended to help countries move from NAP formulation to implementation.	Fifteenth report, executive summary, para. 7; paras. 46-51 and 95-96; table 1, response to decision 6/CMA.7, para. 4.
Programme priorities	Belém Adaptation Indicators and national systems	Encourages the Board, in supporting developing countries in relation to the Belém Adaptation Indicators, to ensure that any alignment of the GCF results management framework is country-driven, supports national adaptation plans and national monitoring, evaluation and learning systems, and avoids creating duplicative reporting requirements or additional burdens for developing countries.	CMA	The report notes that the Secretariat has begun analysing correspondence between the GCF results framework and the Belém Adaptation Indicators and that decision 12/CMA.7 invited the GCF to support developing countries in implementing the framework and aligning it with NAPs and national monitoring, evaluation and learning systems.	Fifteenth report, paras. 118-120; table 1, response to decision 6/CMA.7, para. 4.
Programme priorities	REDD+ results-based payments and forest finance	Encourages the Board to continue the effective operationalization of the policy for results-based payments for REDD+, including through accessible guidance, readiness support, predictable programming opportunities and monitoring arrangements that build on lessons learned from the pilot programme and support nationally determined forest and land-use priorities;	COP and CMA	The report confirms that REDD+ results-based payments have been mainstreamed as a regular financing modality and identifies upstream readiness, guidance, monitoring and reporting as areas requiring continued attention.	Fifteenth report, paras. 99, 102, 126-129; annex VI, table 13 (FP284, SAP061 and FP301).
Programme priorities	Complementarity and coherence among climate funds	Encourages the Board to advance complementarity and coherence with other multilateral climate funds in a country-driven and demand-responsive manner, including through coordinated support for national priorities, streamlined access pathways, coherent results reporting and the avoidance of duplication and additional reporting burdens.	COP and CMA	The report describes expanded collaboration among the GCF, Adaptation Fund, Climate Investment Funds, GEF and FRDL, including common results reporting, capacity-building and country support. We appreciate this effort and highlight that such cooperation should translate into easier access and coherent	Fifteenth report, executive summary, para. 21; paras. 182-187; table 1, response to decision 2/CP.30, para. 10.

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				support at country level while respecting the mandates and governance of each fund.	
Programme priorities	Third replenishment and scaled-up public resources	Urges developed country Parties to contribute to an ambitious third replenishment of the GCF and requests the Board to ensure that the third replenishment and the updated Strategic Plan for 2028-2031 enable a significant increase in predictable public resources, enhanced access for developing countries and scaled-up annual outflows, including for adaptation.	COP and CMA	The report notes the formal launch of GCF-3 and links future strategic work to the NCQG provisions on significantly increasing public resources through the operating entities and pursuing efforts to at least triple annual outflows from 2022 levels by 2030. It also records a reduction in one major GCF-2 pledge, underscoring the importance of a strong and predictable replenishment.	Fifteenth report, executive summary, paras. 26-28; paras. 27, 29, 32-35; table 1, response to decision 6/CMA.7, para. 3.
Programme priorities	Indigenous Peoples access and participation	Encourages the Board to develop, in consultation and co-design with Indigenous Peoples and consistent with the Indigenous Peoples Policy, practical and fit-for-purpose options to enhance Indigenous Peoples' access to GCF resources, including through direct access, readiness support and adapted financing modalities, while ensuring the meaningful inclusion of Indigenous knowledge in project design and implementation.	COP and CMA	The report identifies persistent gaps between policy and practice in Indigenous Peoples' access to GCF resources. It records ongoing work, informed by the Global Conference with Indigenous Peoples and IPAG, to develop options for Board consideration, and notes the importance of Indigenous knowledge in effective adaptation and mitigation.	Fifteenth report, paras. 204-213; table 1, response to decision 2/CP.30, para. 4.

Annotated inputs for the draft guidance to the Global Environment Facility (GEF)

<i>Elements</i>	<i>Sub-elements</i>	<i>Proposed inputs</i>	<i>Draft guidance under: The COP or the CMA</i>	<i>Rationale for the inputs</i>	<i>Source of information / reference</i>
Policies	Streamlining / country ownership	Urges the Council, in implementing the GEF-9 streamlining measures, to ensure that accelerated and simplified project modalities preserve country ownership, nationally determined priorities and the effective role of Operational Focal Points in programming and project prioritization, and requests the Council to continue monitoring and reporting measurable reductions in project-cycle processing times.	COP	The GEF has introduced a broad set of measures to streamline project preparation and approval under GEF-9. While these reforms are welcome, they should preserve the role of Operational Focal Points and country-driven programming, while delivering measurable improvements in project-cycle efficiency.	Report of the GEF to COP 31, Table 1, response to decision 3/CP.30, paras. 14-16, pp. 10-11; Part II, Streamlining Access and Process, paras. 37-41.
Policies	Complementarity and coherence	Urges the Council to ensure that initiatives aimed at enhancing complementarity and coherence with other multilateral climate funds simplify access for recipient countries, avoid duplication of procedures and additional coordination requirements, and do not create new conditions or restrict access to GEF resources or reduce the availability of finance to developing countries.	COP	The GEF is deepening cooperation with other multilateral climate funds, including through GEF-9 and the new LDCF/SCCF programming strategy. As complementarity arrangements become more structured, they should reduce transaction costs and facilitate access for recipient countries, rather than create additional procedural layers or coordination burdens.	Report of the GEF to COP 31, Table 1, response to decision 3/CP.30, para. 13, pp. 9-10; Part II, Complementarity of Multilateral Climate Funds, paras. 42-45; paras. 72-76, including the 10% target for LDCF/SCCF programming resources.
Policies	Results transparency and country-level monitoring	Urges the Council to strengthen transparency and accountability for results by ensuring that recipient countries have timely access, through up-to-date, structured and machine-readable systems, to consolidated and country-disaggregated information on GEF finance, projects and programmes, including progress against agreed indicators and expected and achieved results, and requests the Council to report on measures taken to enhance country-level visibility of results, including under regional and global initiatives.	COP	The GEF has strengthened its results management framework under GEF-9. However, recipient countries do not always have timely and systematic access to sufficiently current, structured and machine-readable project and results data for national portfolio monitoring, particularly under regional and global projects and programmes. Greater visibility of progress against agreed indicators and achieved results would strengthen transparency, accountability, national portfolio oversight and evidence-based programming. The development of dynamic machine-readable access, including through an application programming interface or an equivalent arrangement, would also facilitate the regular use of GEF data by recipient countries.	Report of the GEF to COP 31, Table 1, response to decision 3/CP.30, para. 14, and Part III, Section 1, para. 56; Guidelines on the Implementation of the GEF-9 Results Management Framework, Sections 2-4.
Policies	Country platforms and national programming	Reaffirms that country platforms supported or used by the Global Environment Facility should be voluntary, country-led and established and governed according to national circumstances and priorities, and urges the Council to ensure that such platforms complement, and do not replace or supersede, country-led GEF programming processes; do not	COP	The GEF is expanding its engagement with country platforms, and the GEF-9 Country Engagement Strategy includes specific provisions to support them and undertake programming in their context. While country platforms may strengthen whole-of-government coordination and alignment among financing partners,	Report of the GEF to COP 31, Part II, section 3, paras. 59-64, pp. 42-43; Part II, section 5, paras. 69-78, pp. 44-46.

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		constitute a formal or de facto condition for access to GEF resources or create additional procedural requirements for recipient countries; and do not affect the authority of Operational Focal Points over the programming, prioritization and endorsement of GEF-funded activities.		their use should remain voluntary and responsive to nationally determined institutional arrangements.	