

Submission by the Republic of Malawi on behalf of the Least Developed Countries Group on Guidance to the Global Environment Facility

- The LDC group welcomes the invitation to provide views and recommendations on elements of guidance for the Global Environment Facility, as per decisions 4/CP.29 and 10/CMA.6.
- As per the template and guidelines in providing inputs issued, a preliminary non-exhaustive set of inputs are annotated in the box below.
- Further views will be provided during the sessions at COP30 and CMA7 in November 2025.

Annotated inputs for the draft guidance to the Global Environment Facility (GEF)

Elements	Sub-elements	Proposed inputs	To be considered by: The COP or the CMA	Rationale for the inputs	Source of information / reference
Policies	Streamlining and timeliness	Welcomes the streamlining measures approved by the GEF Council at its sixty-ninth meeting, including the one-step medium-sized project ceiling of USD 5 million and the option to bundle up to two biennial transparency reports and one national communication per enabling activity, and requests the GEF to ensure their full implementation and to report in its next annual report on the time reduction achieved from project identification to CEO endorsement.	COP	Acknowledges Council approval while ensuring follow-up implementation and accountability.	GEF COP30 report reference: Executive Summary Streamlining Access and Process, paras 42-46, p. xii.

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	Wider use of Implementing Agencies	In the context of GEF9 negotiations, acknowledges the proposed policy adjustments aimed to strengthen accessibility to GEF funding and streamline policy requirements, and urges the GEF to implement measures to expand the cohort of implementing agencies to include qualified national and regional entities from underserved regions while upholding minimum fiduciary standards.	COP	LDCs require stronger ownership over adaptation programming, with projects aligned to national priorities such as NAPs. Promotes broader agency engagement for equitable access.	Decision 4/CP.29, para 6. GEF COP30 Report: Table 1: Decisions Adopted by UNFCCC COP 29 and CMA 6, Conclusion of SBI 61 and GEF's Response. P. 8-9.
	Project/programme-based implementation approach (PriA)	Welcomes the proposal for piloting the PriA under the LDCF and the SCCF and encourages its adoption as part of the programming strategy for adaptation at the 40th LDCF/SCCF Council Meeting May/June 2026.	COP	The PriA proposal, as described in the GEF report, offers a concrete mechanism to enable accredited LDC institutions to directly access resources, improving effectiveness, accountability, and responsiveness to country needs.	GEF COP30 Report, paras 38 and 39, pp. 31-32
Programme priorities	Enhanced Transparency Framework (ETF) & BTRs	Requests the GEF to provide timely EA support for first and subsequent BTRs and NCs, avoiding gaps between cycles, and to continue CBIT support; further requests an update on the CBIT TF extension and portfolio completion timeline.	CMA	Timely and sustained support for ETF-related enabling activities and NCs is necessary to avoid gaps in LDC reporting cycles and maintain national capacity.	Decision 10/CMA.6, paras 2–3 (FCCC/PA/CMA/2024/L.18). GEF COP30 Report: ETF/CBIT, paras 148-192, pp. 69–79.
	National adaptation plans and adaptation co-benefits	Encourages that GEF-9 programming directions substantially increase adaptation allocations and co-benefits, strengthen support for NAP formulation and implementation in coordination with the GCF to avoid overlap, and adopt more flexible access modalities, including access through accredited national and regional entities from LDCs recognised by the GCF and AF, together with public, grant-based and highly concessional co-financing	COP	Greater flexibility in access and public, grant-based financing expands LDC access to NAP funding, avoids burdensome requirements that delay implementation, and ensures coordination with the GCF and AF to maximise impact and prevent duplication. For example, the report to COP30 highlights that not all the projects that were technically cleared could be considered for funding approvals	Decision 4/CP.29 , paras 2(c), 2(d). GEF COP30 Report: Adaptation/NAP support/LDCF: paras 100-121, pp. 52–61.

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		arrangements that mobilise additional resources without overburdening these entities.		due to resource constraints, leading to decreased volume in LDCF programming during this reporting period	
	LDCF/SCCF access and smooth-transition measures	Requests the GEF, in administering the LDCF/SCCF, to further simplify access for eligible countries and to operationalize measures supporting recently graduated LDCs for a smooth transition; and urges contributing countries to provide predictable, multi-year replenishments to the LDCF and SCCF, ensuring stability and reliability of adaptation finance for LDCs' medium- and long-term planning and implementation.	COP	Predictable, multi-year contributions are essential for enabling LDCs to plan and implement adaptation actions without disruption. Current year-by-year funding cycles create uncertainty and delay. Streamlined procedures, paired with stable replenishments, will ensure life-saving projects can be delivered without bureaucratic bottlenecks.	Decision 4/CP.29 , paras 8–9 & 14. GEF COP30 Report: Executive Summary paras 8-15, pp. viii; Main Report paras 34-56, pp. 31-34 and para 69, pp.38 and para 73, pp. 39.
	Technology development & transfer (TEC/CTCN linkage)	Encourages the GEF to prioritise adaptation technology in its technology-related programming, in consultation with the TEC and CTCN, and to scale pipelines in areas such as agro-climate services, water-saving technologies, energy security, renewable energy integration, and early warning systems, consistent with national TNAs and NDCs..	COP	Prioritises deployment of locally relevant adaptation technologies, builds CMSME capacity, and strengthens TEC/CTCN collaboration to ensure alignment with LDC priorities and national plans.	Decision 4/CP.29 , paras 2(f), 10. GEF COP30 Report: Technology Transfer, paras 203-204, pp. 82.
	Delineation of public-private & blended finance sources	Invites the GEF to prioritise public, grant-based finance in supporting the Challenge Program for Adaptation Innovation and other initiatives that advance adaptation outcomes in LDCs, and to report on mobilised finance, with clear disaggregation between public and private sources, ensuring that public contributions remain the primary means of support	COP	GEF-8 allocated \$196 million to blended finance, with significant co-financing reported; however, LDCs emphasise that public, grant-based finance must remain the primary channel, and prevents over-reliance on private mobilisation for adaptation actions in LDCs	Decision 4/CP.29 , para 2(d). GEF COP30 Report: paras 137-147 pp. 67-69

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	Country platforms and inclusive national planning	Invites the GEF to support nationally determined mechanisms (country platforms) that strengthen coordination, align programming with national climate priorities, and incorporate inclusive approaches that address social and economic impacts; and to share pilots and lessons learned.	COP	Country platforms, as piloted in Benin, Côte d'Ivoire, Madagascar, and Seychelles, help coordinate support, align funding with national priorities, and ensure that climate actions deliver social and economic benefits in line with national plans.	Decision 4/CP.29 , paras 2(a), 2(b). GEF COP30 Report: Executive Summary para 49, pg. xiii. Main report para 15, p. 27 and paras 57-61, pp 34-35.
	Complementarity & coherence	Requests the GEF to further strengthen complementarity and coherence with other Multilateral Climate Funds including the Adaptation Fund, Climate Investment Funds, Green Climate Fund and the Fund for Responding to Loss and Damage through joint planning, coordinated programming and harmonised procedures, while ensuring that such efforts do not reduce or restrict finance available to LDCs and SIDS; and further requests the GEF to report on collaboration modalities, examples of sequential programming and coordinated delivery benefiting LDCs and SIDS in its next annual report.	COP	The GEF has strengthened coordination with other multilateral climate funds and initiated collaboration with the FRLD. Further coordination among MCFs, including the FRLD can improve efficiency, reduce duplication and expand access to timely, targeted finance for LDCs. Collaboration should maximise each fund's comparative advantage without diminishing GEF allocations, time consumption, bureaucratic hurdles or limiting access for LDCs.	Decision 4/CP.29 , paras 3–5, 4. GEF COP30 Report: Complementarity paras from executive summary 47-50, pp. xiii and paras from main report 66-79, pp.37-40.
	LDCF access, resources, and alignment with NAPs	Urges developed country Parties to make substantial, predictable, and multi-year pledges to the LDCF to address the funding gap identified in FY2025, and requests the GEF to report annually on unmet demand and projects awaiting approval due to resource constraints; further requests the GEF, through the LDCF, to expand investment in climate-resilient livelihoods, food security, early	COP	Addresses urgent funding shortfall and delays in LDCF approvals; strengthens resilience through livelihoods, food security, and early warning systems; ensures national ownership and coherence with GCF support.	Decision 4/CP.29 , paras 2(c), 2(d), 8–9, 14. GEF COP30 Report: paras 109-121, pp.53-61.

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		warning systems, and other priorities identified in LDCs' national adaptation plans, ensuring coherence and complementarity with GCF support.			
Eligibility criteria	Capacity support to OFPs and national systems	Urges the GEF to further strengthen OFP capacity and ownership, including support for supervision of missions, field visits, and coordination, and to report uptake and outcomes at COP31.	COP	The GEF has scaled up OFP support through regional trainings and enhanced country engagement. Further strengthening OFP capacity improves national ownership, supervision, and effective project delivery in LDCs.	Decision 4/CP.29 , para 2(e), 15. GEF COP30 Report: para 261-265, p. 95-96.
Others/Policies	Replenishment & outflow scaling, implementation of NCQG decision	Welcomes initiation of GEF-9 and requests the GEF to present, at COP31, an implementation pathway to scale up public funds and triple outflows from 2022 levels by 2030, including through the LDCF and SCCF, consistent with the Baku outcomes considering securing front-loaded and predictable multi-year pledging strategies to avoid funding uncertainty.	COP	GEF, as operating entity of the UNFCCC financial mechanism and in its admin role to the LDCF and SCCF, should respond to the NCQG Baku outcome such as triple outflows from 2022 levels by 2030, including through the LDCF and SCCF. For LDCs, this requires not only higher resource volumes but also predictable and front-loaded pledges to match urgent and growing adaptation needs. Multi-year strategies will ensure the LDCF and SCCF can deliver at the required pace and scale.	Decision 1/CMA.6 , para 16. Decision 4/CP.29 , paras 2 (a-g), 16, 17. GEF COP30 Report: paras 284-287, pp. 100.

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 or 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.