

June 28, 2017

Dear Members and Alternate Members of the Board,

As civil society organizations actively engaged with the Green Climate Fund, we are writing with concerns about the Board's approach to adaptation, especially in light of its recent inability to reach consensus to approve two funding proposals meant to build resilience to the adverse impacts of climate change in Least Developed Countries. It is widely understood among development and adaptation practitioners that legitimate adaptation measures fall along a continuum, with interventions ranging from those that address the underlying vulnerabilities to the impacts of climate change through to those that directly confront climate impacts.<sup>1</sup> We expect that all Board members would share these widely-held understandings. While some on the Board have opined over which activities represent "development" versus which represent "adaptation," in practice, this distinction is largely artificial. Many adaptation efforts invariably overlap with traditional development initiatives. **Vulnerability to climate change impacts is highly correlated with development deficits and the capacity of people to build resilience. At the GCF, adaptation funding must be used to address and reduce these underlying causes of vulnerability to climate change, in addition to more obvious physical impacts.** Adaptation funding at its best should be transformational, in line with the GCF mandate, and as such must go well beyond addressing the most immediate climate-related impacts.

To date, the full Board has been more comfortable approving proposals geared toward technological approaches to adaptation that seem more easily quantifiable and clear-cut, like early warning systems and climate-proofing or building new physical infrastructure. However, for adaptation financing to be comprehensive in its reach, effective, and sustainable, it must also include activities that decrease human vulnerability and increase adaptive capacity. **Adaptation activities that make individuals, households, communities, and ultimately entire countries more resilient to climate shocks and other negative impacts of climate change will frequently look similar to development activities, as they remain intertwined with each other.** For example, if a person's livelihood is vulnerable to climate impacts because their income is largely derived from a source negatively affected by climate change, then working to diversify that individual's source of income will help to make their livelihood more climate resilient. A range of "development activities" may constitute appropriate adaptation interventions, including, for example, livelihood diversification, improving women's rights and access to resources, education and public health initiatives, enhancing food security, as well as other interventions that target socioeconomic conditions; building human and institutional capacity; and communication and community-led participatory planning processes.

The Board's impasse on the Bangladeshi and Ethiopian proposals highlights the need for better guidance for adaptation project proponents. Climate change adaptation is very localized and context-specific; it is an evolving science without hard and fast rules. **Ultimately, what qualifies an activity as an "adaptation activity" is not the activity in and of itself, but the analysis of vulnerabilities exacerbated by climate change, capacities and impacts, and an explicit intention to address the climate context -- all of which together lead to the choice of a particular intervention.** The case to be made for an activity to qualify as adaptation often comes in asking project proponents to define adaptive capacity or climate resilience

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<sup>1</sup> See, for example, the widely cited 2007 World Resources Institute report, "[Weathering the Storm. Options for Framing Adaptation and Development.](#)" in particular its *continuum of adaptation activities: from development to climate change*, which includes "(1) addressing drivers of vulnerability, (2) building response capacity, (3) managing climate risk, (4) confronting climate change."

and then to describe how the proposed activities would contribute to such resilience or adaptive capacity. **The Board's guidance should recognize the process-oriented nature of what qualifies as adaptation financing and should require adaptation project proponents to provide an explicit theory of change to connect the proposed activities to enhanced resilience.** Further, the GCF should ensure that the Secretariat and Independent Technical Advisory Panel can draw upon the requisite expertise and experiences of other Funds (e.g. Adaptation Fund, Global Environment Facility, Least Developed Countries Fund) and adaptation practitioners for the assessment of adaptation proposals.

Communities and countries with the least capacity and, arguably, the greatest need for scarce climate finance often most require multilateral investment in addressing sources of vulnerability to climate change. **Addressing this underlying vulnerability holistically, "in the context of sustainable development" as required by the Fund's Governing Instrument, is an extremely important role for the GCF in the global climate finance landscape, especially given its target of allocating 50% of its funds to adaptation, with 50% of that amount reserved for the most vulnerable.** This also suggests that rather than looking at one-off adaptation projects (e.g. for infrastructure), GCF adaptation support should follow programmatic approaches, including through direct and enhanced direct access. **Where the GCF invests in decreasing vulnerability, it should be willing to go beyond a narrow focus on incremental cost financing to fund the *agreed full cost* of the intervention that leads to enhanced climate resilience.**

Finally, the attempt to create a false binary between development and adaptation undermines trust and credibility both inside and outside the board room, and is counter to the GCF's guiding principles. It also stings with irony. Many of the same developed countries splitting hairs over what qualifies as adaptation at the GCF represent governments that at the UNFCCC count questionable development finance activities as part of their bilateral contribution to climate finance.

For the GCF to fulfill its mission, the needs of the most vulnerable must be at the core of the institution's work. This cannot appropriately occur until the full Board recognizes and operationalizes a holistic approach to adaptation. We urge you to do so expeditiously and thank you for your consideration of this urgent matter.

Sincerely,

Abibiman Foundation, Ghana  
ActionAid International, Global  
African Women's Network for Community Management of Forests (REFACOF), Cameroon  
Aksi! for gender, social and ecological justice, Indonesia  
Alianza Nicaraguense ante el Cambio Climatico, Nicaragua  
AMCDD, Morocco  
Asian Peoples Movement on Debt and Development, Regional  
Asia Pacific Forum on Women, Law and Development (APWLD), Regional (Asia Pacific)  
Asian-Pacific Resource and Research Centre for Women (ARROW), Malaysia  
Beyond Copenhagen Collective, India  
Both ENDS, The Netherlands  
Bretton Woods Project, United Kingdom  
Center for Environment, Bosnia and Herzegovina  
Center for International Environmental Law (CIEL), Switzerland/United States  
Centre for 21st Century Issues, Nigeria

Centro Alexander von Humboldt, Nicaragua  
CERPAC, CONGO  
CESTA, Friends of the Earth El Salvador  
Child and Green Foundation, Nigeria  
Chirapaq, Center of Indigenous Cultures of Peru  
Climate & Sustainable Development Network (CSDevNet), Nigeria  
Community Initiatives for Development in Pakistan  
DIGNIDAD Alliance, Philippines  
DIVA for Equality, Fiji  
Dr. Uzo Adirieje Foundation (DUZAFUND), Nigeria  
Earth Day Network, United States  
Earth In Brackets, United States  
EcoEquity, United States  
Ethiopian Society for Consumer Protection, Ethiopia  
Friends of the Earth Cameroon  
Foundation for Grassroots Initiatives in Africa (GrassRootsAfrica), Ghana  
Friends of the Earth Australia  
Friends of the Earth Ghana  
Friends of the Earth Southwest WA, Western Australia  
Friends of the Earth U.S.  
GenderCC-Women for Climate Justice, Germany  
Germanwatch, Germany  
Heinrich Böll Stiftung North America, United States  
HELVETAS Swiss Intercooperation, Switzerland  
Human Nature, United States  
Icccad, Bangladesh  
IDRC, Canada  
Institute for Agriculture and Trade Policy, United States  
Institute for Climate and Sustainable Cities, Philippines  
Institute for Policy Studies, United States  
Interamerican Association for Environmental Defense (AIDA), Regional  
International Rivers, Global  
Kitanglad Integrated NGOs Inc. (KIN), Philippines  
Labour, Health and Human Rights Development Centre, Nigeria  
Leave it in the Ground Initiative (LINGO), Germany  
Les Amis de la Terre Togo  
Maasai Community Outdoor Educators, Kenya  
Mom Loves Taiwan Association, Taiwan  
National Association of Professional Environmentalists (NAPE), Uganda  
Oxfam, Global  
Pacific Partnerships on Gender Climate Change and Sustainable Development, Pacific Small Island States  
(Regional Coalition)  
Pan African Climate Justice Alliance (PACJA), Africa/Regional  
Philippine Movement for Climate Justice (PM CJ), Philippines  
Polski Klub Ekologiczny, Poland  
Réseau Action Climat – France  
Reacción Climática, Bolivia  
REFACOF -African Womens Network for Community Management of Forests, Cameroon

Regional Centre for International Development Corporation (RCIDC), Uganda  
Resource Efficient Agricultural Production-Canada  
Sanctus Initiative for Human Development and Values Sustainability (SIHDEVAS), Nigeria  
Save the Children Australia  
Sierra Club, United States  
Siglo XXIII, El Salvador  
Smile Organization for Relief and Development, Yemen  
Society for Conservation and Sustainability of Energy and Environment in Nigeria (SOCSEEN), Nigeria  
Society for Conservation and Sustainability Afrihealth Optonet Association, Nigeria  
South African Institute of International Affairs, South Africa  
SustainUS, United States  
Tebtebba (Indigenous Peoples' International Centre for Policy Research and Education), Philippines  
The Hunger Project Mexico  
Third World Network, Malaysia  
Transparency International-Korea  
Unitarian Universalist Service Committee, United States  
Women's Environment and Development Organization, United States  
WWF, Vietnam