

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.¹ 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

¹ 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 (CSDDevNet), Nigeria
Community Initiatives for Development in Pakistan
DIGNIDAD Alliance, Philippines
DIVA for Equality, Fiji
Dr. Uzo Adirieje Foundation (DUZAFOUND), 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 (PMCI), 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