



**GREEN
CLIMATE
FUND**

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Consideration of accreditation proposals and activities – Addendum VIII

Accreditation assessment of APL170

Summary

This document contains the accreditation assessment conducted by the Secretariat and the Accreditation Panel in accordance with decision B.31/06 and the transitional arrangements in respect of the revised accreditation framework adopted in decision B.42/13 paragraph (m) and set out in annex VI to that decision, and the recommendation by the Accreditation Panel for accreditation of applicant 170 (APL170), Catholic Relief Services – United States Conference of Catholic Bishops (CRS), based in the United States of America.

I. Introduction

1. Catholic Relief Services – United States Conference of Catholic Bishops (CRS) is a humanitarian, recovery and development organization with a commitment to assist the poor and vulnerable overseas. CRS has offices in more than 60 countries and is one of the world’s largest private voluntary organizations, supporting international relief and development work in over 87 countries and territories around the world.

2. The applicant submitted its application for accreditation to GCF via the online accreditation system on 6 October 2018. Accreditation fees were received from the applicant on 15 February 2019, thereby launching the Stage I institutional assessment and completeness check. Stage I was completed on 29 August 2025, and the applicant progressed to the Stage II (Step 1) accreditation review, which has been concluded with the publication of this assessment. The applicant has applied to be accredited for the following parameters under the GCF fit-for-purpose approach:¹

- (a) **Access modality:** international;
- (b) **Track:** normal track;
- (c) **Maximum size of an individual project or programme:** medium;²
- (d) **Fiduciary functions:**³
 - (i) Basic fiduciary standards; and
 - (ii) Specialized fiduciary standard for project management;
- (e) **Maximum environmental and social risk category:** medium risk (category B);⁴ and
- (f) Indicative result areas for intended projects/programmes with GCF:
 - (i) Forests and land use;
 - (ii) Livelihoods of people and communities;
 - (iii) Health, food and water security; and
 - (iv) Ecosystems and ecosystem services; as well as
 - (v) Public and cross-cutting types of projects/programmes.

II. Stage I institutional assessment

3. The applicant applied and was assessed by the Secretariat during Stage I under the normal track accreditation process in accordance with the GCF policies and standards to the extent applicable to accreditation below:

- (a) Updated Strategic Plan for the Green Climate Fund: 2020–2023 (decision B.27/06);

¹ Refer to section 4.2 below for the scope of accreditation recommended by the Accreditation Panel.

² As per annex III to decision B.31/06, “medium” is defined as “maximum total projected costs at the time of application, irrespective of the portion that is funded by GCF, of above USD 50 million and up to and including USD 250 million for an individual project or programme.”

³ Decision B.07/02.

⁴ As per the revised Environmental and Social Policy adopted in decision B.BM-2021/18, category B is defined as “Activities with potential limited adverse environmental and/or social risks and impacts that individually or cumulatively, are few, generally site-specific, largely reversible, and readily addressed through mitigation measures.”

- (b) Strategic Plan for the GCF 2024–2027 (decision B.36/13);
- (c) Updates to the accreditation framework (decision B.31/06);
- (d) Guidelines for the Operationalization of the Fit-for-purpose Accreditation Approach (decision B.08/02);
- (e) Policy on Prohibited Practices (decision B.22/19);
- (f) Anti-Money-Laundering and Countering the Financing of Terrorism Policy (AML/CFT Policy) (decision B.18/10);
- (g) Policy on the Protection of Whistleblowers and Witnesses (decision B.BM-2018/21);
- (h) Comprehensive Information Disclosure Policy of the Fund (decision B.12/35) regarding the disclosure of environmental and social (E&S) information;
- (i) Updated Gender Policy and Gender Action Plan 2020–2023 (decision B.24/12);
- (j) Revised Environmental and Social Policy (decision B.BM-2021/18); and
- (k) Evaluation Policy (decision B.BM-2021/07).

2.1 Legal status, registration, permits and licences

4. The applicant provided documents on its establishment and licences to operate, where relevant, as a part of the application. The applicant was originally incorporated under the name of War Relief Services – National Catholic Welfare Services on 8 June 1943 and is registered under the name Catholic Relief Services – United States Conference of Catholic Bishops as a non-profit corporation under the laws of the District of Columbia, United States of America, under registration number 741952.

5. The applicant has indicated and provided evidence that it has independent legal personality and legal capacity to enter into legal arrangements directly with GCF. In accordance with the transitional arrangements in respect of the revised accreditation framework adopted in decision B.42/13 paragraph (m) and set out in annex VI to that decision, if approved, the applicant's accreditation will be deemed to be complete on the date that GCF issues a confirmation/certificate evidencing the applicant's accreditation.

2.2 Institutional presence and relevant networks

6. CRS operates globally, implementing programmes in over 87 countries and territories and maintaining offices in more than 60 countries. CRS implements programming primarily through partnerships. During the reporting period reflected in the 2024 Annual Report⁵, CRS worked with 1,978 local partners and reached approximately 198 million people worldwide.

7. The institutional presence of CRS includes long-term engagement with local organizations, civil society actors, faith-based institutions and government entities. A significant component of the CRS global network is its collaboration with national Caritas organizations, which collectively form the Caritas Internationalis federation comprising more than 160 member organizations. This network supports the work of CRS at community, national and international levels.

8. CRS participates in a range of global and regional networks relevant to climate adaptation, disaster risk management, food security, and resilience. These include the Anticipation Hub and its Protection and Gender Inclusion Working Group, the Cash Learning

⁵ See <https://www.crs.org/sites/default/files/documents/2025-08/crs-annual%20report-2024.pdf>.

Partnership and Anticipatory Cash Working Group, the Global Food Security Cluster and its Anticipatory Action Working Group, AFR100, the Global Evergreening Alliance, and the Global Soils Partnership. CRS also maintains memoranda of understanding and technical partnerships with international organizations and research institutions, including Consultative Group on International Agricultural Research centres, Conservation International, the Rainforest Alliance and multiple universities in the United States and partner countries.

9. Through these networks, CRS works with governments and multistakeholder coalitions to support national climate objectives, strengthen policy coherence, improve service delivery, and facilitate access to climate finance and technical expertise.

10. The applicant intends to implement climate adaptation and resilience programming focused on vulnerable communities, particularly in fragile and conflict-affected contexts. Its proposed programming emphasizes anticipatory action, disaster risk management, and multisectoral climate adaptation, integrating food security, climate-resilient livelihoods, water and sanitation, shelter and green recovery interventions. CRS plans to work in alignment with national climate priorities by collaborating with government institutions and implementing partners across GCF strategic impact areas, including health, food and water security; livelihoods; ecosystems; and forests and land use.

11. CRS's intended programming also prioritizes scaling community and landscape-level approaches. This includes community-led disaster risk management, climate-smart agriculture, watershed restoration, drylands regreening, and agroforestry. These approaches are designed to link local implementation with subnational and national systems through the use of climate information, early warning systems, and partnerships with governments, multistakeholder platforms and the private sector, with the objective of achieving sustained resilience and systems-level change beyond individual projects.

2.3 Track record

12. CRS has an extensive operational track record in humanitarian response, recovery and development programming. Since financial year 2021, CRS has implemented more than USD 8 billion in project costs across more than 100 countries, working with hundreds of donors. CRS routinely manages complex donor-funded grants ranging from approximately USD 20 million to over USD 200 million.

13. In relation to climate change, CRS implements climate adaptation, disaster risk management and resilience programming across a significant portion of its portfolio. In financial year 2024, CRS estimates that approximately 25 per cent of its USD 1.3 billion portfolio was directly related to climate adaptation interventions, disaster risk management and anticipatory action, implemented in more than 50 countries. This estimate excludes additional climate-relevant components embedded within multisector food security, WASH, shelter and emergency programmes.

14. The applicant's track record in financing and managing sustainable development and climate change-related projects to date includes the following:

- (a) USD 200 million (grant) for the Somos Río Lempa restoration fund programme jointly managed with El Fondo de Inversión Ambiental de El Salvador in the Rio Lempa watershed area of El Salvador;
- (b) USD 16.5 million (grant) for the Agricultural Landscape Restoration Initiative programme at El Salvador, financed by the Howard G Buffett Foundation;
- (c) USD 17 million (grant) for the Promoting the Resilience Objectives of Restorative Agriculture in Communities for Economic Sustainability programme in Guatemala, financed by the United States Agency for International Development;

- (d) USD 11.4 million (grant) for the Mionjo programme in Madagascar to increase resilience through green infrastructure, reforestation and water management, financed by the World Bank group; and
- (e) USD 5 million (grant) for the Restorative Agriculture in Communities for Economic Sustainability programme in Honduras, financed by the United States Agency for International Development.

2.4 Potential support for direct access entities

15. CRS has a long-standing approach to strengthening the capacity of local, national and subnational partners, including civil society organizations, faith-based institutions, and government entities. CRS currently works with more than 1,800 local partners and applies a structured subaward management system that includes fiduciary oversight, technical assistance and institutional capacity development.

16. The applicant has provided direct support to government entities seeking to strengthen their engagement with international climate finance mechanisms. In the Philippines, CRS supported national government agencies in developing a climate-focused concept note intended for submission to GCF. In Madagascar, CRS has worked closely with the Ministry of Environment and Sustainable Development in its roles as NDA to strengthen institutional fiduciary and technical capacity for engagement with international climate finance institutions. This support focused on enhancing the NDA's coordination and oversight functions and did not relate to the Ministry pursuing accreditation as a direct access or accredited entity.

17. CRS maintains institutional platforms dedicated to partner capacity-strengthening, including its Institute for Capacity Strengthening,⁶ which provides training, tools and technical support on financial management, project management, monitoring and evaluation, and compliance with donor standards. These systems are designed to support partners' progression towards meeting accreditation requirements of international climate finance institutions, including GCF.

18. Once accredited, CRS intends to leverage its existing partnership model, technical expertise and capacity-strengthening systems to support potential direct access entities and executing entities in project preparation, safeguards application, fiduciary compliance and alignment with GCF policies and procedures.

III. Stage II accreditation review assessment

19. The applicant applied under the normal track accreditation process. Its application has been assessed by the Accreditation Panel (AP) during Stage II (Step 1) against requirements in accordance with the GCF policies and standards identified in paragraph 3 above to the extent applicable to accreditation.

20. As part of this assessment, the AP consulted the applicant's website and third-party websites to complement the information provided in the application.

3.1 Fiduciary standards

3.1.1 Basic fiduciary standards: key administrative and financial capacities

⁶ See <https://ics.crs.org/>.

21. The CRS governance framework is described in its by-laws and corporate governance guidelines which define the authority, composition and responsibilities of the Board of Directors (BoD) and committees. The 24-member Board, the majority of whom are episcopal directors appointed by the United States Conference of Catholic Bishops provides strategic oversight aligned with the CRS mandate. The BoD is supported by seven standing committees, including an Executive Committee, Audit and Risk Management Committee, Budget and Finance Committee, Overseas Operations Committee and Catholic Identity Committee. Each committee has clearly delineated responsibilities outlined in committee charters and demonstrated via summary samples of committee agendas, work plans, and meeting documentation for 2025, shared with the AP. A Board Handbook provides further evidence of structured performance monitoring and internal accountability practices. Appointments to the Board, term limits and rotation practices were confirmed through the recent committee appointment and membership list files.

22. At the executive level, according to the current CRS organizational chart, the Chief Executive Officer and President manages an executive leadership team with directors responsible for global programming, resource mobilization, global operations and finance. The applicant's internal audit function reports administratively to the Chief Financial Officer, and functionally to the Audit and Risk Management Committee of the Board, and the global risk and compliance function report to the Executive Vice President – responsible for programmes. Activities are delivered through country offices⁷ across five regional management structures. CRS reported significant organizational structural changes in 2025 regarding staffing levels and geographic presence, streamlining operations and strengthening marketing and resource mobilization to adapt to the dynamic funding and its operational environment. It is also noted in the 2024 CRS annual audit report that the agency continues to assess the impact of the United States Government Executive Order on Reevaluating and Realigning United States Foreign Assistance Programs and subsequent developments. Regarding strategy implementation and performance monitoring, the AP was provided with the CRS 2024 global results report and organizational performance and effectiveness report. These include detailed metrics and results aligned with CRS's Vision 2030 Strategic Framework entitled 'Vision 2030: In Their Own Hands'⁸ and cover reach and impact, programme outcomes and targets, financial performance and resource mobilization and cross-cutting issues like gender, safeguarding and localization. The reported total income for CRS in financial years 2022–2024 was more than USD 1.1 billion.

23. CRS's financial management framework is centrally governed through a suite of standardized headquarters-level policies and procedures, which are implemented across its global operations and contextualized to local regulatory frameworks where applicable. These policies are operationalized through the organization's Oracle Cloud Fusion Enterprise Resource Planning (ERP) system, which supports end-to-end financial management, including transaction processing, budgeting, procurement and financial reporting. The ERP system also facilitates quarterly cash forecasting, treasury management, payment approvals and expenditure tracking, with embedded automated controls and delegated authority protocols ensuring consistency and compliance across country offices. Field-based finance teams are supported through ongoing guidance and oversight from headquarters.

⁷ CRS country office typology: Country Office – a CRS operation implementing a multi-sector programme with a full office and a robust permanent CRS staff presence; Program Office – a presence model characterized by a relatively light complement of CRS staff required to oversee one or more projects; Outreach Country – a country where CRS has no physical office or permanent staff. CRS brings an intentional engagement, focusing on advancing programmatic goals and influencing systems through local partners, networks or temporary CRS secondments, rather than direct implementation; Specific Circumstance Country – a country where CRS has no physical presence or staff. Engagement are generally on a “one-off” basis, triggered by specific time-bound events, such as an emergency response.

⁸ See <https://www.crs.org/about-us/agency-strategy>.

24. CRS's published audited financial statements for financial years 2023 and 2024 were presented in conformity with the Generally Accepted Accounting Principles applicable in the United States of America and broadly consistent with the principles of International Financial Reporting Standards for non-profit entities. The applicant's Chief Financial Officer confirmed that no material weaknesses were reported by its auditors in these years. CRS also provided financial monitoring reports from the Democratic Republic of the Congo and Madagascar field programmes as evidence of budgetary control, compliance and headquarters oversight at the programme operations level.

25. The applicant's Audit and Risk Management Committee oversees CRS's audit and financial assurance activities, internal controls and compliance, risk governance and fraud oversight, including exposure and receiving reports on fraudulent activities. Recent extracts of agendas and meeting minutes demonstrate the Committee's active engagement with internal audit reporting and recommendation tracking, risk assessments and investigation outcomes. CRS's Internal Audit (IA) function reports directly to the Audit and Risk Management Committee under an administrative reporting line to the Chief Financial Officer as described in paragraph 22 above and operates under an independent charter that adheres to the International Professional Practices Framework for internal auditing. The IA team consists of qualified auditors, headed by a Senior Director of IA who holds a recognized professional certification. The team structure and independence are supported by the charter of the Audit and Risk Management Committee and internal audit charter. Under the applicant's Internal Audit Methodology, regular country reviews assess internal controls and report key findings to the BoD using OpsAudit software to record and track. Audit planning documents, including samples of audit reports from several countries of operation, were provided to demonstrate the applicant's track record.

26. Under the applicant's IA Quality Assurance Improvement Programme, annual self-assessments are conducted to assess the effectiveness and performance of the internal audit function in compliance with the Institute of Internal Auditors professional standards. In addition, external quality assessments are conducted under arrangements in place with the internal audit units of CRS's peer organization and in accordance with the Institute of Internal Auditors' recommended five-year assessment cycle, with the last assessment conducted in 2022 and the next scheduled for 2027.

27. The CRS control framework is anchored in Internal Control Integrated Framework⁹ and reinforced by the implementation of the three lines of defence model,¹⁰ which delineates responsibilities for risk ownership, oversight and assurance. The AP reviewed relevant policies and procedures (e.g. Internal Controls Policy, Internal Control Review Procedure and Segregation of Duties Procedure) that operationalize this framework across global operations, including at country programme level, where documented workflows, approval hierarchies and periodic internal reviews were evidenced. The framework defines control activities across entity-level, process-level and system-level risks. At field level, CRS applies financial controls through documented delegation authorities, automated workflow in Oracle, and periodic internal control reviews. Subrecipient management and country-based compliance reviews, samples of which were provided, reinforce operational accountability.

28. Enterprise Risk Management (ERM) at CRS is described in a Risk Management Capacity Statement that describes two cross-functional, executive-level bodies: an Enterprise Risk Management Council which meets on a monthly basis chaired by the Global Risk and

⁹ The Committee of Sponsoring Organizations of the Treadway Commission develops guidelines for businesses to evaluate internal controls, risk management, and fraud deterrence.

¹⁰ The "three lines of defence" model is a way of organizing risk management so that: (1) operational teams own and manage risks in their day-to-day work; (2) specialist functions like risk, compliance and finance oversee, guide and challenge them; and (3) internal audit provides independent assurance to the governing body that risks are being properly managed.

Compliance (GRC) and ERM Senior Director; and a Compliance Council, which meets on an ad hoc basis, also chaired by the GRC and ERM Senior Director. Oversight is supplemented by the GRC department, which functions separately from IA, and plays a second-line role, focused on risk analysis, compliance reviews and field monitoring, conducting on-site risk assessments, following up on audit findings, and ensuring corrective action tracking through country and regional offices. Evidence was provided or detailed, aged tracking of an internal audit recommendations using a software application called OpsAudit/AuditBoard. These headquarters-based monitoring tools are also used by regional finance personnel to support country offices.

29. CRS maintains a suite of procurement and supply chain policies that collectively define competitive bidding, contract approval thresholds, partner procurement oversight and ethical safeguards. Key documents include a Procurement Policy, Procurement Approvals Policy, Consultants Policy, Subrecipient Financial Management Policy and Supplier Code of Conduct. The Procurement Policy outlines principles of transparency, fairness and value-for-money. The Procurement Approvals Policy establishes delegated financial authority, while the Subrecipient Financial Management Policy requires CRS to monitor procurement conducted by implementing partners. CRS also provided procurement records and monitoring reports from field offices in the Democratic Republic of Congo and Madagascar to demonstrate application of these procedures.

30. CRS confirmed that competitive procurement opportunities are generally communicated via local noticeboards and communication channels at the discretion of the business unit procuring. Where required by donor policies and requirements, procurement notices are publicly advertised as are the results of procurement awards, according to evidence shared by the applicant. CRS confirmed its willingness to publish its procurement policies, and work toward publishing competitive procurement notices and subsequent awards and indicated that it will adopt a policy specific to procurement by CRS and its executing entities for GCF-funded activities. Procurement dispute resolution mechanisms are embedded in partner agreements and procurement terms. Regarding oversight and assessment of procurement controls, CRS management confirmed the coverage of procurement in its annual average of ten country office internal audits and further confirmed the conclusion of a specific global procurement internal audit.

31. The AP finds that the applicant's policies, procedures and capacity partially meet the basic fiduciary standards on key administrative and financial capacities. The applicants' track record is sufficient. The relevant gap is identified in paragraph 30 and is reflected by the corresponding condition for accreditation in section 4.2.

3.1.2 Basic fiduciary standards: transparency and accountability

32. CRS has a mature and institutionalized approach to managing ethical risks and responding to fraud, corruption and other integrity violations. Fiduciary standards are overseen by its GRC function which incorporates an Fraud Oversight Team (FOT). The GRC is structurally and functionally distinct from the internal audit function.

33. An established framework for ethics and conduct in the applicant's Code of Conduct and Ethics outlines expected standards of behaviour for all CRS staff, consultants and representatives. Internal guidance on managing misconduct or wrongdoing is also provided. The Code incorporates core values such as integrity, respect, stewardship and accountability, and includes explicit provisions on fraud, corruption, harassment and abuse of power. CRS requires staff to annually certify their compliance with key policies with samples of signed acknowledgement forms and completion logs for a mandatory ethics training curriculum. Recent examples of signed annual certifications of compliance were shared with the AP.

34. The CRS Conflict of Interest Policy sets out clear roles, responsibilities and procedures for disclosure and management and mitigation, applying to members of the Board, staff and subrecipients. Evidence of implementation was provided through completed, redacted disclosure forms from members of the BoD and field office staff. While CRS does not maintain a central register of disclosures or declared conflicts, records are retrievable from business units upon request. Oversight mechanisms include conflict of interest reviews as part of annual performance evaluations, supervisory and human resources compliance checks, and structured Board-level follow-up processes.

35. CRS demonstrates a clear “tone from the top”, with consistent messaging from its leadership on ethical conduct and zero tolerance for misconduct, including fraud and corruption, as evident in public communications such as annual reports and leadership statements, as well as through the agency’s whistle-blower reporting portal described in paragraph 36 below, which is prominently linked via the CRS website.

36. CRS polices pertaining to preventing and handling cases of wrongdoing, including prohibited practices, are covered under its published Code of Conduct and Ethics and Allegation Management Policy & Procedure. The Code of Conduct defines fraud and corruption in a manner substantively aligned with GCF standards and policies. It is supported by internal mechanisms for prevention, detection, investigation and enforcement, and by a Whistleblower and Non-Retaliation Policy. This policy sets out channels for reporting via surface mail, country-specific dedicated toll-free numbers, a dedicated email address, or local channels, all captured through the outsourced, vendor-managed Navex EthicsPoint¹¹ platform, which also facilitates secure online reporting and provides the possibility of anonymous reporting. The IET, under the GRC as described in paragraph 32 above, is responsible for assessing and investigating cases, following structured procedures that include triage, fact-finding, reporting and disciplinary or corrective actions. Evidence shared with the AP included anonymized case outcomes from multiple countries. The IET operates under standard operating procedures aligned with international standards and maintains a trained independent team and secure documentation protocols. The GRC reports aggregated investigation data to senior management and the Audit and Risk Management Committee, informing continuous policy and procedural improvements. CRS’s ‘Report Wrongdoing’¹² website page provides detailed and stakeholder-friendly information on ethics and whistle-blowing policies and procedures and guidance, links to intake channels including EthicsPoint and information on the investigative process and features frequently asked questions.

37. CRS has adopted and operationalized policies and procedures to prevent and respond to money laundering and terrorist financing risks. Its Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Policy and Procedure¹³ sets out the organization’s commitment to comply with applicable laws and international standards, with responsibility for implementation assigned to the GRC function and clearly defined roles and responsibilities across the organization. The policy specifies the scope, frequency and verification requirements for due diligence using LexisNexis Bridger Insight XG, a comprehensive screening tool applied to all counterparties – including vendors, subrecipients and consultants – and defines criteria for exceptions. Screening is conducted at both the onboarding and payment/disbursement stages against multiple international sanctions lists, including those maintained by the United Nations, European Union, and the United States Office of Foreign Assets Control. The AP reviewed general evidence of recent screening results, due diligence logs and audit trails, and noted that findings are recorded and retained in accordance with policy requirements. CRS

¹¹ See <https://www.navex.com/en-us/platform/employee-compliance/whistleblowing-solutions/ethicspoint>.

¹² See <https://secure.ethicspoint.com/domain/media/en/gui/12748/index.html>.

¹³ Full name: Anti-Money Laundering (AML), Anti-Terrorist Financing, Export Controls, Economic Sanctions and Excludes Parties Policy and Procedure.

further demonstrated operationalization through annual compliance certifications regarding application of the AML/CFT Policy, completed by business units and confirmed that periodic AML/CFT refresher training is provided to finance and procurement staff globally.

38. The AP finds that the applicant's policies, procedures and capacity, supported by evidence of its track record, fully meet the basic fiduciary standards on transparency and accountability, and to the extent applicable to accreditation, the GCF Policy on Prohibited Practices, the GCF Policy on the Protection of Whistleblowers and Witnesses and the GCF AML/CFT Policy.

3.1.3 Specialized fiduciary standard for project management

39. CRS had been running programmes in over 130 countries prior to 2025 restructuring, and this has now reduced to the presence in 87 countries. Since 2021, CRS has implemented programming worth more than USD 8 billion funded by multiple donors, including United States Agency for International Development (USAID), World Bank, Global Fund, Global Environment Facility and the European Union. CRS' largest awards active in 2025 were USAID-funded food security, resilience and livelihoods programmes of USD 1.3 billion in Ethiopia (Joint Emergency Operations Program) implemented over 2023–2027; Resilience Food Security Activities awards for Madagascar (USD 60 million, 2024–2029); Haiti (USD 44 million); Nigeria Malaria Program (USD 309 million, 2024–2026); World Bank Sudan Enhancing Community Resilience project (USD 80 million); and several programmes in Niger, among many others.

40. While historically CRS has undertaken many food- and health-related projects, particularly funded by USAID, it has recently been developing new project structures in climate adaptation, such as the Rio Lempa Conservation Project in El Salvador (USD 200 million implementation fund over 20 years), where CRS is a technical lead partner for restoration and conservation activities funded from the savings under the debt-for-nature swap transaction.¹⁴

41. CRS is typically a prime recipient of donor funding, and the share of funding received as a subrecipient has been relatively minor. As a prime recipient, CRS executes programmes using a variety of modalities including direct implementation and consortium management, while providing oversight and ensuring that CRS project standards are upheld. CRS supports local partners, to strengthen their capacities. Partners are both religious and non-sectarian and include non-governmental organizations, community groups, and host country governments. CRS depends on strong relationships with partners at the national and local level and reported having worked with over 1,978 partners in 2024. CRS has established an Institute for Capacity Strengthening – an online platform for partners with various tools, guidance notes and courses.

42. CRS develops projects based on its systems and policies for project design and management. ProPack I was developed in 2004 and provides foundational guidance for project design and appraisal. It outlines the steps, tools and templates for conducting assessments, developing results frameworks, theories of change and risk analyses. In 2016 CRS developed its Project Management Standards (PMS),¹⁵ which promote effective project management irrespective of size, context, focus or funding. Eighteen standards are organized around four phases: project design, start-up, implementation and close-out. The applicant's Compass project management website¹⁶ embeds the PMS into a digital platform which provides practical tools such as workflows, compliance tracking and quality assurance mechanisms. During project preparation, project teams use ProPack I to guide the technical design (e.g. stakeholder analysis, logical frameworks and risk matrices) and these outputs are then documented and tracked in

¹⁴ See https://www.crs.org/sites/default/files/2025-06/25OS-1416650%20Rio%20Lempa%20Brief_FinalC_0.pdf.

¹⁵ See <https://introduction.to.the.crs.project.management.standards-28.nov.2018.pdf>/<https://compass.crs.org/sites/default/files/introduction.to.the.crs.project.management.standards>.

¹⁶ See <http://compass.crs.org/http://compass.crs.org>.

Compass to meet PMS. Every project uses both ProPack I for design methodology and Compass for operational compliance and monitoring.

43. Project reviews start with the preparation of a Project Idea Note initiated by a country programme, approved by a Regional Technical Advisor and a Deputy Regional Director. The Project Idea Note is stored on Gateway, the CRS system for managing the pipeline based on Salesforce platform, with several examples shared with the AP. Full proposal review is undertaken by the relevant Deputy Regional Director, Regional Technical Advisor and Regional Finance Officer, with examples for the applicant's PREVALE project in Afghanistan and the Resilience Food Security Activities project in Madagascar provided to the AP. Examples of additional appraisal and planning documents were also shared such as implementation schedules, risk matrices, risk mitigation plans and budgets, reflected in multiple output documents, which may differ depending on donor requirements. As a result of recent restructuring, CRS is optimizing and centralizing its project review guidelines. While the business development function was previously dispersed across its regional offices, they will now form a global team and utilize Global Proposal Review Guidance applicable to all projects. The global guidance applies from 2026 for institutional donor funding sources, whether CRS is a lead or subrecipient. The proposals are to be reviewed by the global team of technical advisers, finance managers and programme quality experts. CRS is in the process of operationalizing the Global Proposal Review Guidance. The Compass platform provides comprehensive guidance for project closures, including the formation of a cross-disciplinary team, managing documentation and records, and engaging stakeholders throughout the process. CRS provided detailed close-out plans for several projects as examples.

44. CRS processes for project risk management are outlined in PMS and ProPack I and enhanced where required according to specific donors' requirements. The applicant develops and updates project risk management plans and risk registers for all major programmes, with examples provided for the Restore Africa Malawi project and the Joint Emergency Operations Program programme in Ethiopia. CRS will typically enter in subrecipient agreements with project partners and monitor them in line with its Subrecipient Financial Management Policy in which all responsibilities of CRS as a prime recipient of grant awards generally flow down to its subrecipients. Project managers fill out subrecipient capacity assessment checklists (publicly available on the Institute for Capacity Strengthening website), and entities are categorized into three levels of perceived risk, with annual assessments of entities of the higher two categories, according to the policy. The applicant provided examples of subrecipient assessment checklists and ongoing monitoring reports.

45. Projects are monitored on a quarterly and annual basis, with internal monitoring guidance and examples of monitoring reports and minutes of monitoring meetings for recent projects shared with the AP. CRS project managers are accountable for the performance results and for ensuring projects uphold the PMS, while also supporting implementing partners as needed depending on partner capacity and scope and scale of programming.

46. CRS has publicly available Monitoring, Evaluation, Accountability and Learning (MEAL) policies and procedures¹⁷ overseen by a global MEAL unit and operationalized by country-level MEAL managers, and project-level MEAL coordinators and officers, as well as project managers who have MEAL responsibilities. The MEAL unit is led by a director and includes regional focal points as well as technical advisers. MEAL policies require independent, external evaluations for all projects over USD 5 million where CRS is a prime recipient. Examples of external evaluation reports were shared with the AP. Disclosure of evaluation reports is through the CRS Gateway platform and shared with donors and relevant stakeholders. The applicant is capable

¹⁷ See <https://www.crs.org/sites/default/files/documents/2025-12/monitoring-evaluation-accountability-learning-policies-pocedures.pdf>.

of conducting evaluations and disclosing information for GCF projects consistent with its requirements.

47. The AP finds that the applicant's policies, procedures and capacity, supported by evidence of its track record, fully meet the specialized fiduciary standard for project management.

3.1.4 **Specialized fiduciary standard for grant award and/or funding allocation mechanisms**

48. The applicant did not apply for accreditation for this standard at this time.

3.1.5 **Specialized fiduciary standard for on-lending and/or blending (for loans, equity and guarantees)**

49. The applicant did not apply for accreditation for this standard at this time.

3.2 Environmental and social safeguards

3.2.1 Environmental and social policy, management and monitoring

50. The CRS Environmental & Social Safeguards Policy and Procedure (ESSP) approved by its Executive Vice-President for Overseas Operations in 2018, provides the overarching framework for implementing its environmental and social management system (ESMS). It defines CRS's environmental and social safeguards (ESS) standards and outlines its approach to identifying, addressing and managing environmental and social (E&S) risks and impacts across projects and programmes. The policy reinforces CRS's commitment to protecting vulnerable groups and the environment, aligns with national laws and legal frameworks in countries of operation, and applies throughout the programme/project cycle. It is informed by key international frameworks, including: (i) Sustainable Development Goals; and (ii) International Financial Corporation Performance Standards (PS) 1-8. The ESSP complements CRS's Safeguarding, Monitoring, Evaluation Accountability and Learning and Procurement and Equal Employment Opportunity Policies, as well as the Code of Conduct and Ethics, and the Feedback, Complaints and Response Mechanisms Guide. The AP has reviewed the entity's ESSP, performance standards, and related policies complementing the ESSP, and finds them compatible with GCF projects/programmes up to Category B.

51. CRS uses its Agriculture Climate Risk Assessment and Climate Adaptation Prioritization tools to identify and mitigate climate risks, focusing on strengthening community resilience. By December 2025, 26 per cent of CRS's portfolio supported climate adaptation and mitigation, totaling USD 831.93 million across 63 countries. Many of CRS's growing climate-related programmes and projects adhere to rigorous ESS standards set by donors and funders. By entering into contractual agreements, CRS commits to these standards and agrees to adopt all donor and funder requirements. CRS does not finance carbon-intensive activities. Following the CRS financial year 2022 baseline inventory which yielded an estimated total of 16,750 metric tonnes of carbon dioxide across its operations and emissions sources, it conducts biannual measurements of its greenhouse gas (GHG) emissions using the GHG Protocol Corporate Standard as the methodological framework to estimate, calculate and track emissions associated with its operations and mission delivery. CRS has submitted projects that demonstrate its capacity to foster intersectoral linkages, scale up climate adaptation actions, strengthen institutional capacity and collaborate with partners such as the Coca Cola Foundation, European Commission, World Wildlife Fund, United Nations Development Programme, and the World Bank. These efforts support governments in achieving climate

policy and finance objectives, scaling up local solutions, and contributing to the paradigm shift pursued by GCF.

52. CRS does not have a stand-alone policy on Indigenous Peoples; however, its ESSP, supported by the ESS Screening and Risk Profiling Form, includes specific requirements and questions on Indigenous Peoples. Through projects in Guatemala, Malawi, Mexico (Oaxaca and Chiapas), Peru, the Philippines and Uganda, CRS has extensive experience in inclusive stakeholder engagement, free prior and informed consent, and promoting Indigenous Peoples' rights and cultural practices. These efforts empower vulnerable communities and include training in peacebuilding and conflict transformation, as well as advising and supporting Indigenous Traditional Religious Leaders to mediate land disputes and convene community peace dialogues. Policy changes resulting from CRS's approach to Indigenous Peoples' issues related to land conflict in Mindanao in the Philippines are documented in the policy paper, "Local Solutions to Land Conflict". The AP finds that CRS has the systems and capacity to meet PS 7 on Indigenous Peoples under the GCF interim ESS standards.

53. The CRS Safeguarding Policy, revised in 2025, adopts a zero-tolerance approach across all programmes and workplaces to sexual exploitation, abuse and harassment (SEAH), child or forced labour, and human trafficking. The Safeguarding Risk Management Policy and Procedures set mandatory requirements for risk identification, mitigation planning and communication at the project level. Together with the Accommodation, Equal Employment Opportunity and Non-Discrimination, and the Whistleblower and Non-Retaliation Policies, as well as the Code of Conduct and Service Provider Code of Conduct, CRS prohibits discrimination, upholds the rights and dignity of persons with disabilities, and promotes a survivor-centered approach to SEAH case management. All employees, partners, suppliers and service providers must comply with these policies and any safeguarding-specific terms outlined in their contracts. Suspected SEAH concerns must be reported verbally or in writing, logged on the whistleblower site (EthicsPoint) within 24 hours of occurrence, and handled with strict confidentiality. Reporting channels include Global People Resources, supervisors, CRS Regional or Deputy Director, Country Representative, Safeguarding Director and Advisors, or via email. CRS is committed to conducting investigations that are safe, timely, thorough and professional, in accordance with its Safeguarding Allegation Management Procedure. Support for survivors includes psychosocial assistance, medical or legal referrals, measures to address safety and security concerns, and access to other appropriate services as needed. The AP finds that CRS has the systems and capacity to meet the SEAH-related principles under the GCF revised Environmental and Social Policy.

54. The CRS MEAL Policy and Procedures require (i) data collection on environmental, social and gender issues of projects and programmes; (ii) public consultation and evaluations to capture lessons learned; and (iii) continuous improvement and staff orientation. The Guidance Sheet on Community-defined Indicators ensures beneficiary input in defining success indicators for projects. Each applicable project includes a MEAL plan, with defined roles as follows: the MEAL manager, field agents, and/or ESS staff are responsible for ESS monitoring and training; the programme manager is responsible for communication and ESS incident management; and the MEAL manager and/or the ESS focal point is responsible for ESS reporting. During emergencies, real-time evaluations inform subsequent response phases and agency learning. CRS has received funding from institutions such as the World Bank and corporate investors, which require detailed monitoring and data tracking of ESS and environmental, social, and governance factors. CRS has submitted sample project environmental status reports, environmental mitigation monitoring plans, incident monitoring reports, and audits, demonstrating CRS track record in participatory monitoring and evaluation of E&S, gender and climate-related aspects with international donors. The AP finds that CRS has the systems and capacity to meet the requirements of the GCF Evaluation Policy.

55. CRS's ESMS applies a precautionary, exclusion-based due diligence process to avoid and minimize risks and impacts across investments, including those implemented by financial

intermediaries. In addition, the CRS Disability Inclusive Project Design Guide provides comprehensive strategies for integrating disability inclusion into development and humanitarian project design. The ESMS uses tools to: (i) identify and assess environmental, social, climate and gender risks in line with PS 1–8; (ii) classify projects (A, B or C), including sub-projects; (iii) engage stakeholders; (iv) implement E&S management plans; and (v) monitor and evaluate performance. E&S screening reports are prepared by the Country Head of Programming, reviewed by regional and headquarters technical staff, and approved by the Director of Institutional Donor Engagement and Advancement. Each applicable project is supported by an environmental and social management plan, regularly assessed for compliance. CRS has submitted samples of ESS and risk profiling forms, environmental and social impact assessments, environmental mitigation monitoring plans, and environmental status reports, demonstrating its capacity to identify and manage E&S risks and comply with donor requirements.

56. CRS maintains a global results dashboard to track key performance indicators and verify compliance with its policies, ESMS and standards across operations. This is complemented by the applicant's Enterprise Risk Management dashboard that monitors top agency risks and mitigation measures. MEAL and project teams collect data throughout implementation, coordinated by the Institutional Development Department's Senior Manager, and report findings to Executive Management. MEAL Policies and Procedures require periodic internal audits of country programmes, and CRS is working towards providing an audit or independent report to evaluate the effectiveness of the institutional E&S management programme.

57. CRS has established a Climate Finance Support Unit to provide oversight and build capacity on ESS across projects. The Unit's workplan includes developing knowledge products, ensuring cross-agency coordination and accountability, and integrating compliance systems and policies into CRS processes. At the project level, environmental, social and governance and ESS staff report on ESS indicators, manage incidents, conduct ESS training, support MEAL teams in managing the Feedback Complaints and Response Mechanism (FCRM), and develop communication materials on ESS topics. In addition to technical and implementation staff embedded in CRS projects who support climate change and mitigation project objectives, CRS also maintains teams dedicated to advancing climate and resilience objectives both at an agency level and through technical backstopping of projects. Staff of the Climate Finance Support unit have received E&S training on ESSP, safeguarding, occupational health and safety, free prior and informed consent, community mobilization and stakeholder engagement, FCRM, gender equity and social inclusion (GESI), contract management for staff and suppliers, and funder compliance requirements, among other topics. Training for sub-awardees is provided as needed. CRS's partnership with local institutions plays a key role in helping entities develop robust ESMS.

58. The AP finds that the applicant's ESMS, comprising the ESSP, risk and impact identification and risk categorization framework, E&S management and monitoring tools, and staff competencies, supported by evidence of its track record, partially meets the GCF revised Environmental and Social Policy to the extent applicable to accreditation and GCF interim ESS standards for maximum E&S risk Category B/I-2 projects/programmes with respect to PS 1–8. The relevant gap is identified in paragraph 56 and is reflected by the corresponding condition for accreditation in section 4.2.

3.2.2 **External communications, consultations, information disclosure and grievance redress mechanism at the institutional level**

59. At the entity level, the CRS institutional grievance mechanism uses the Navex EthicsPoint platform (as described in paragraph 36 above), which provides an independent channel for external communications, including concerns and complaints related to misconduct

and safeguarding violations. For projects and programmes, the applicant's FCRM provides a structured approach that prioritizes community preferences, safety, responsiveness, and accountability in addressing environmental and social performance concerns. Additionally, the Safeguarding Policy and MEAL Policy require country programmes to establish reporting channels for those whom CRS serves, ensuring a transparent, accountable and gender-sensitive system for resolving grievances. FCRM is promoted and disseminated to staff, partners and beneficiaries through in-person awareness sessions, posters, radio advertisements and other means. FCRM posters are produced in English and local languages and displayed in community centres and meeting venues.

60. Through FCRM, CRS commits to registering and addressing queries and complaints, escalating issues as needed, and maintaining stakeholder communication throughout the process. Supported by the Code of Conduct and Ethics and the Whistleblower Policy, FCRM maintains and tracks data in the CRS Youtrack System. Complaints, including anonymous submissions, can be made through multiple channels: online report form, toll-free number, WhatsApp, SMS, suggestion boxes, face-to-face with project staff, or email. The AP finds EthicsPoint and the FCRM aligned with GCF criteria for accessibility, accountability, transparency and independence, as outlined in the revised GCF Environmental and Social Policy.

61. The ESSP commits to transparency and timely disclosure of E&S assessment documents to stakeholders. Programme participants receive environmental, social, and governance information through face-to-face community meetings and via information education and communication materials displayed in community centres or meeting areas. Free, prior and informed consent meetings also serve as a platform for sharing project details and grievance redress mechanisms. CRS fosters partnerships with private and public sectors, donors and local communities to enhance outreach and impact. Its website provides access to policies, training manuals, project reports and E&S information. CRS has formally committed to disclosing full project-level E&S documentation, consistent with timing and language requirements, for E&S risk category B projects and programmes that may be financed by GCF. However, on a case-by-case basis, these may be redacted in the cases of conflict-affected countries.

62. CRS requires its executing entities to establish FCRM channels proportionate to project risks and impacts, ensuring complaints are resolved within 30 days and sensitive cases responded to within 72 hours, supported by a registry that tracks receipt and resolution. Country offices maintain integrated FCRM data management systems, including quarterly reports or dashboards, to enable adaptive management. Country Representatives ensure FRCMs are in place and functioning, while programme managers ensure accessibility and community trust and receive, acknowledge, document and respond to feedback through community-level channels. Country programmes designate an Accountability Officer to receive and triage feedback, validate triage conducted by field staff, coordinate responses, and provide individual feedback where required. In their absence, these functions may be undertaken by a Safeguarding staff member or Senior Project Officer. The Country Program Office reporting structure and FCRM standard operating procedure ensure independence from the project when reviewing feedback and determining the appropriate response. FCRM managers oversee the process and prepare analytical reports for project leadership to support continuous improvement and learning. Safeguarding complaints undergo a preliminary review by the Global Safeguarding Team. If necessary, an investigation team – including designated field staff – is convened to handle the case and submit a formal report, overseen by Global Safeguarding Team members. Complainants are notified of actions taken, and those dissatisfied may seek legal recourse outside CRS. CRS' automated FCRM system operates in 40 country offices, supporting over 400 projects and emergency responses across 7 regions, with over 90 per cent of feedback addressed within the assigned time frame.

63. CRS allocates a dedicated budget for its Global Safeguarding team, including Regional Safeguarding Advisors, who together oversee safeguarding prevention and response efforts

including implementation of the Safeguarding Risk Management Policy and Procedure. CRS utilizes a secure third-party system for managing policy violations and grievances, accessed by Safeguarding, Fraud, and designated Human Resources teams, and allocates dedicated annual resources for its maintenance. The Safeguarding Director collaborates with the Global Risk and Compliance team and the Enterprise Risk Management Council to monitor high-level safeguarding risks and mitigation measures. Staff of the Climate Finance Support unit have received training on the FCRM.

64. The AP finds that the applicant's system of external communications, Communications Strategy, EthicsPoint, FCRM, and information disclosure, supported by evidence of its track record, fully meets the GCF revised Environmental and Social Policy to the extent applicable to accreditation, GCF interim ESS standards and GCF Information Disclosure Policy regarding E&S information disclosure requirements for maximum E&S risk Category B projects/programmes with respect to PS 1-8.

3.3 Gender

65. The CRS Global Gender Strategy 2020-2030 sets agency-wide minimum standards for gender integration across programmes and operations. It includes screening gender risks, conducting project-level gender risk assessments, and developing Gender Action Plans. It also sets out steps for stakeholder consultations, grievance management, partnerships development, budgeting, monitoring and evaluation, information disclosure and knowledge management, all with a gender and diversity perspective. Country teams conduct participatory gender audits, gender analyses and stakeholder consultations at project start-up, applying findings to project design, Gender Action Plans and MEAL activities. Teams collect sex- and age-disaggregated data quarterly, including women's participation in project activities. These measures strengthen CRS's impact and ensure women's empowerment and gender co-benefits are integrated across operations.

66. CRS demonstrates strong capacity to integrate gender considerations across its programmes. Project documents highlight its ability to: (i) analyse gender risks; (ii) ensure meaningful participation of women, youth and vulnerable groups; (iii) implement gender-sensitive FCRMs; (iv) develop Gender Action Plans; (v) monitor gender-responsive indicators at all levels; (vi) collect sex-disaggregated data; and (vii) conduct gender audits. These initiatives aim to empower women and youth through gender-responsive measures and enhance climate resilience, underscoring CRS systems and capabilities to meet the requirements of the GCF updated Gender Policy.

67. The global gender team comprises a Senior Technical Advisor for Gender Equality and Social Inclusion (GESI), a Senior Technical Advisor for Gender and Nutrition-Sensitive Agriculture, and three GESI Technical Advisors. GESI staff monitor the impact of gender and GESI approaches and manage knowledge and learning, while MEAL teams handle data collection, analysis, global results tracking and reporting. All staff are required to mainstream gender equality and foster an inclusive, gender-sensitive organizational culture. Gender consultants are engaged for concept and project development and implementation as needed.

68. CRS is committed to gender equity and strengthening capacity of women. Following an external entity-level gender assessment, completed in 2022, CRS implemented measures to improve diversity in terms of gender, decision-making participation, gender-balance, fair compensation, and standardized policies and procedures. These areas were identified as opportunities to enhance the impact of the Gender Strategy. As of October 2025, women comprise 40.28 per cent of the CRS workforce, with over 54 per cent of senior positions held by women compared to 45 per cent held by men. Currently, 20 per cent of BoD are female.

69. CRS advances gender-climate synergies through initiatives that position women as key actors in climate action, such as: the Integrated Approach to Gender in Agricultural Extension

and Market Systems Services Brief (Asia); Empowerment Study in Climate-Smart Agriculture (Honduras and Nicaragua); Restore Africa GESI; and Climate Resilient Cities. Its strong track record includes producing gender assessments, toolkits and participatory gender audit guidance, reinforcing its leadership in gender equity, social inclusion and climate resilience.

70. The AP finds that the applicant's gender policies, procedures, capacities and competencies, supported by evidence of its track record, fully meet the GCF updated Gender Policy to the extent applicable to accreditation.

IV. Conclusions and recommendation

4.1 Conclusions

71. Following the assessment, the applicant is found to have the potential to support GCF in implementing its Strategic Plan for 2024–2027 with respect to:

- (a) Bringing complementarity to the existing GCF network of accredited entities, particularly through its broad geographical presence including in least developed countries and small island developing States, across various regions and in Africa;
- (b) The indicative projects/programmes that the applicant intends to submit to GCF within the scope of accreditation recommended by the AP in paragraph 73 below;
- (c) Potential contribution to the adaptation and mitigation balance in the GCF portfolio since the applicant focuses on adaptation and cross-cutting activities and supporting diversity in GCF results areas such as ecosystems and ecosystem services, and health, food and water security;
- (d) Mobilizing climate finance at scale since the applicant is being recommended for accreditation in the medium size category; and
- (e) Addressing the interests of particularly vulnerable groups and hardest-to-reach groups and communities.

72. Following its assessment, the AP concludes the following in relation to the application with respect to the applicant's ability to meet the GCF accreditation standards identified in paragraph 19 above:

- (f) The applicant partially meets the requirements of the GCF basic fiduciary standards on key administrative and financial capacities. The gap relates to procurement policy, notice and award publication. The gap is identified in paragraph 30 above, and is addressed by the corresponding condition for accreditation in section 4.2 below;
- (g) The applicant fully meets the requirements of the GCF basic fiduciary standards on transparency and accountability, and to the extent applicable to accreditation, the GCF Policy on Prohibited Practices, the GCF Policy on the Protection of Whistleblowers and Witnesses, the GCF AML/CFT Policy and fully meets the specialized fiduciary standard for project management;
- (h) The applicant partially meets the GCF revised Environmental and Social Policy to the extent applicable to accreditation and GCF Interim ESS standards, in relation to the medium E&S risk Category B. The gap relates to absence of an audit or independent report evaluating the effectiveness of the institutional E&S management programme. The gap is identified in paragraph 56 above, and is addressed by the corresponding condition for accreditation in section 4.2 below;
- (i) The applicant has demonstrated that it has a policy, procedures and competencies in order to implement its gender policy, which is found to be consistent with the GCF

Updated Gender Policy to the extent applicable to accreditation, and has demonstrated that it has experience in gender consideration in the context of climate change; and

- (j) The applicant has demonstrated that it has institutional-level systems, capacities and competencies regarding evaluation as required by the aforementioned GCF basic and specialized fiduciary standards and interim ESS standards that would enable it to implement the GCF Evaluation Policy for its GCF-funded activities.

4.2 Recommendation on accreditation

73. The AP recommends, for consideration by the Board, APL170 for accreditation as follows:

- (a) **Accreditation type:**
- (i) **Maximum size of an individual project or programme:** medium
 - (ii) **Fiduciary functions:**
 - (1) Basic fiduciary standards; and
 - (2) Specialized fiduciary standard for project management;
 - (iii) **Maximum environmental and social risk category:** medium risk (category B).
- (b) **Conditions:** the applicant will be required to submit to the AP, through the Secretariat, information on how it has complied with the conditions. The AP will thereafter assess whether the conditions have been met. This assessment will be communicated by the Secretariat, on behalf of the AP, to the Board for information purposes:
- (i) Condition to be met by the applicant prior to the submission of the first funding proposal to the Board:
 - (1) Delivery to GCF by the applicant of evidence, in a form and substance satisfactory to the AP, of the adoption and publication of a procurement policy or policy provisions aligned with GCF fiduciary standards that applies specifically to GCF-funded projects; and
 - (ii) Condition to be met by the applicant with the submission of the first funding proposal in E&S risk category B to the Board:
 - (1) Delivery to GCF by the applicant of a report, in a form and substance satisfactory to the AP, prepared by an independent body evaluating the effectiveness of the implementation of the applicant's ESMS, including lessons learned and recommendations to improve the ESMS.

74. The applicant has been informed of the recommendation for accreditation, including the accreditation type and conditions, as identified in paragraph 73 above, and agrees to the recommendation.

4.3 Remarks

75. The applicant is encouraged to align with international and peer good practices by institutionalizing the public disclosure of its procurement policies and associated dispute resolution mechanisms.

76. The applicant is further encouraged to adopt a formal institutional policy for the routine publication of competitive procurement opportunities, beyond instances where such disclosure is mandated by specific donor requirements and in accordance with the applicant's current policy thresholds for competition, and subsequent procurement award results.



77. The applicant is encouraged to strengthen the transparency and disclosure of project evaluation results.
