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Meeting of the Board

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GCF/B.44/17/Add.02

6 March 2025

Operationalizing GCF regional presence: assessment results, proposed configurations and implementation plan – Addendum II: Response matrix for comments received on the draft document

Summary

The document contains responses to the Board and active observers' comments on the draft document titled “Operationalizing GCF regional presence: assessment results, proposed configurations and implementation plan”.

I. Response matrix for Board comments received on the draft document “Operationalizing GCF regional presence”

Comments were received, in chronological order, from:

- Germany
- Finland-Switzerland
- Italy
- Japan
- UK
- Ireland, New Zealand and Spain
- Canada and Belgium
- Argentina, Bolivia, Brazil, Ecuador, Uruguay
- Chile, Colombia, Costa Rica and Honduras
- Sweden
- Denmark, the Netherlands and Luxembourg
- Kiribati
- Maldives
- Saudi Arabia
- France (delivered after deadline)

Issue Category	Comment	BMs/Seats	Secretariat Response
General feedback	<p>Regional presence represents the most significant institutional reform since the establishment of the Fund and responds to long-standing access concerns raised by developing countries.</p> <p>Germany especially welcomes:</p> <ul style="list-style-type: none"> • the structured application of the ToR, • the standardized costing model, • the proposed scenario approach and its design parameters, • the gate-based rollout approach, • the introduction of a PPP-based remuneration framework <p>However, Germany underlines that:</p>	Germany	<p>Thank you. The Secretariat’s proposal is designed to remain within the Fund’s approved administrative budget envelope over time, supported by multi-year budget management and reporting through established processes. Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements. While not reflected in the indicative cost tables, a summary of the proposed host country contributions was included in the Limited Distribution document and is intended to inform Board decision-making. When host country agreements are confirmed, the contributions will be reflected in GCF’s budgeting process.</p>

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	<ul style="list-style-type: none"> Regional presence must remain budget-neutral over the medium term. Host country contributions must be clearly reflected and legally secured. Governance, delegated authorities and fiduciary controls must remain HQ-anchored. Red-line limitations regarding privileges and immunities require careful legal review before selection. 		<p>On governance and controls, the implementation plan reinforces that delegated authorities for regional offices would be exercised within the Secretariat's existing legal and internal control framework which continues to be strengthened, with headquarters retaining fiduciary and corporate control functions (including legal, finance, HR and risk oversight).</p> <p>Regarding legal status and privileges and immunities, eligibility screening is undertaken in line with the Board-adopted terms of reference, with any preliminary limitations indicated in proposals summarized in the limited distribution addendum for Board consideration. Detailed confirmation and finalization would occur through host country agreement negotiations and entry into force (Gate 1) prior to operationalization. The draft decision text requires the Secretariat to report regularly to the Board on the status of the Host Country Agreement negotiations including any issues.</p>
General feedback	<p>We would like to express our sincere appreciation to the Secretariat for the tremendous work undertaken so far and for providing the opportunity to comment on the proposed documents regarding the operationalization of the GCF regional presence. While the information provided is clear and well structured, we believe that further clarification is needed, particularly with respect to costing, staffing, as well as the proposed ranking methodology, and the process.</p>	<p>Finland - Switzerland</p>	<p>Thank you. Clarification is provided under your other comments.</p>
General feedback	<p>Italy expresses gratitude to the Secretariat for the hard work conducted so far to advance this very important process on time for the B.44 consideration of the configuration proposal. In general terms, we appreciate the smooth and timely conclusion of the call for proposals, the high degree of participation and the availability of a ranking based on the evaluation criteria. We also appreciate that the Secretariat has already developed three configuration scenarios, providing a cost estimation for each one of those.</p>	<p>Italy</p>	<p>Thank you. Clarification is provided under your other comments.</p>

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	<p>However, there are few elements that appear to be missing from the document, or only partially addressed, and that in our view, are necessary for an informed decision of the Board. These elements mainly relate to cost estimates and comparability of offers, cost neutrality strategy, scenarios and the special procedure to apply to the decision.</p>		
General feedback	<p>Japan has consistently reiterated at previous meetings of the Board the importance of rigorous cost analysis at regional offices. From a cost-effectiveness perspective, we consider that further scrutiny is warranted in certain areas; accordingly, we set out the following comments.</p>	Japan	Thank you. Clarification is provided under your other comments.
General feedback	<p>Canada and Belgium welcome the opportunity to provide comments and feedback on the draft GCF Regional Presence Board document. We support the approach taken by the Secretariat to ensure integrity in the process and follow the terms of reference adopted at B.42. Our constituency supports the roll-out of regional presence as it will bring beneficiary countries closer to GCF processes and should reduce the climate finance accessibility gap for many LDC's; we also count on increased country ownership, and further positive improvements in the processes and contacts with local AE's. We particularly support the multilingualism approach and emphasize the importance of addressing this issue through regional presence.</p>	Canada - Belgium	Thank you. Your comment is noted.
General feedback	<p>Recognizing the importance of the decision to be taken by the Board, we would encourage the Secretariat to make all efforts to consult with Board Members and countries that submitted proposals to help build consensus ahead of B.44.</p>	Canada - Belgium	Thank you. The Secretariat supports the need for an inclusive and transparent consultative approach ahead of B.44. A Board consultation plan is being implemented, including engagement with the Budget Committee and Risk Management Committee, written consultations, constituency outreach led by the Executive Director, technical sessions across time zones, a pulse survey, and running Q&As on the Board Portal.

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			In addition, the Secretariat will continue targeted outreach with countries that submitted proposals, within the boundaries of the Board-adopted process.
General feedback	Methodology and evaluation of regional presence proposal were adequate as well as the configuration proposed which reflects the concerns of this seat.	Argentina, Bolivia, Brazil, Ecuador, Uruguay	Thank you. Your comment is noted.
General feedback	We would appreciate the Board being able to move forward on this issue and we look forward to seeing the matter progress toward a decision at the next meeting.	Denmark, the Netherlands and Luxembourg	Thank you. Your comment is noted.
General feedback	We do not agree with the configurations proposed and request that additional options for where the outpost may be located are considered in the options provided to the Board.	Saudi Arabia	<p>Thank you. The Secretariat notes your request to consider additional options for the location of the Pacific outpost. The scenarios were designed to keep options evidence-based and comparable by anchoring host locations in the evaluation results. Host locations that clearly fall into a statistically higher-performing tier of the results were included. Once the candidates were ranked, there was a noticeable step change: a small group of front-runners scores well above the rest, with a clear gap to the next option. That gap was large relative to the normal spread of scores within each region, so the suggested selections were not close calls among similar candidates.</p> <p>Consistent with this approach, the Pacific outpost was held constant across scenarios and Fiji (Suva) was presented because it scored clearly in the top tier among eligible Pacific proposals, with a significant margin over the other Pacific proposal.</p>
General feedback	<p>The draft Board document presented is overall comprehensive and satisfactory.</p> <p>However, it would be helpful to further clarify the specific added value of each scenario in terms of proximity, language, risk, and operational effectiveness.</p> <p>While the choice regarding the regional presence of the GCF carries significant implications, it seems premature at this stage to propose a special decision-</p>	France	<p>Thank you. The Secretariat recognizes the request to make the comparative added value of each scenario clearer. The Secretariat has added more information in the final Board document to help compare between the scenarios.</p> <p>The Secretariat also notes the concern that the proposed special decision-making arrangement could be perceived as premature. The intent has never been to replace consensus. The intent was to present an option on contingency, grounded in existing Board procedures, to be used only if consensus is not achieved, and to ensure clarity and integrity should a vote ever be required. This was the same approach as was presented by the evaluation committee with respect to the</p>

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	<p>making arrangement that would create an exception to the Green Climate Fund's rules and set a precedent. We recognize that consensus seems difficult in not impossible to reach but the discussion has not taken place yet and mechanisms already exist in such cases where consensus cannot be reached.</p>		<p>selection of the headquarters location at the Board's second meeting (B.02). The Secretariat has updated the final Board document to further clarify this intent.</p>
<p>I. Introduction</p>	<p>Germany welcomes the clear linkage to decisions B.41/10 and B.42/14</p> <p>We recommend that the Introduction:</p> <ul style="list-style-type: none"> • Explicitly reaffirms budget neutrality as an operational principle, not only an analytical objective. • Clarify that regionalization strengthens portfolio oversight and country support, while preserving institutional coherence. <p>Highlight that implementation remains conditional upon full Host Country Agreement (HCA) compliance, including privileges and immunities.</p>	<p>Germany</p>	<p>Thank you. Germany's recommendation on introductory framing is noted. The introduction has been adjusted to more clearly signal (i) the expectation of budget neutrality over time within the approved administrative budget envelope, and (ii) that implementation is sequenced through the negotiation, conclusion and entry into force of host country agreements, including legal status and privileges and immunities (Gate 1). Elements related to operational design and institutional coherence are addressed in the implementation plan and governance sections.</p>
<p>I. Introduction</p>	<p>Need further insight into the Secretariat's decisions, and relevant background, that led to the current sequencing of events, and also reflect on the disadvantages, perceived or otherwise, that this sequencing poses to countries that have made bids for regional offices.</p>	<p>Maldives</p>	<p>Thank you. The Secretariat recognizes the concern regarding the sequencing of the process, and the time and effort invested by countries in preparing proposals before the Board had adopted the final configuration. The sequencing reflected the mandates in decisions B.41/10 and B.42/14 and the approach set out in document GCF/B.42/12, under which the call for proposals was launched without prejudging the Board's decision on configuration. This approach was intended to support equity and inclusivity by providing all eligible non-Annex I Parties an equal opportunity to submit proposals, while enabling evidence-based scenario development and implementation planning.</p>
<p>I. Introduction</p>	<p>The Board document GCF/B.42/12 being referred to was not taken note of in the decision operationalizing regional presence. The recommendations and analysis should be informed by Board decisions and endorsed Board documents. The analysis and</p>	<p>Saudi Arabia</p>	<p>Thank you. The Secretariat recognizes the importance of grounding the analysis and recommendations in Board decisions. The assessment and recommendations in the B.44 document were prepared in line with the terms of reference adopted by the Board in decision B.42/14, including the eligibility requirements, weighted</p>

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	<p>recommendations provided should be guided by the terms of reference adopted by the Board in decision B.42/14.</p>		<p>evaluation criteria, and the selection process applied to all proposals. Document GCF/B.42/12 is referenced because it was itself referenced in decision B.42/14.</p> <p>To avoid any ambiguity, the Secretariat has adjusted the introduction to more explicitly anchor the analysis in decision B.42/14, and to reference GCF/B.42/12 as the supporting document reflected in the Board’s mandate.</p>
<p>II. Assessment of proposals for regional presence</p>	<p>Germany stresses the importance of strict adherence to the adopted ToR and evaluation criteria.</p> <p>We recommend:</p> <ul style="list-style-type: none"> • Clearer transparency on how weighted and non-weighted criteria were applied. • Stronger explanation of cost differentials between candidate cities. • Clear presentation of host-country contributions and their legal certainty. <p>From Germany’s perspective, locations with:</p> <ul style="list-style-type: none"> • Demonstrated GCF portfolio relevance, • Concrete host-country contributions, • Political and operational stability, • Climate ambition of the government, • And conducive climate finance/political environment (“climate hub”) <p>should be prioritized.</p> <p>In this context, proposals lacking meaningful portfolio engagement and/or financial contribution, where economically possible raise concerns regarding legitimacy and long-term sustainability.</p>	<p>Germany</p>	<p>Thank you. Germany’s emphasis on strict adherence to the Board-adopted terms of reference (ToR) and evaluation criteria is noted. The Secretariat’s assessment was conducted in line with the ToR and applies (i) weighted criteria (A1–A4 and B1–B3) and (ii) non-weighted comparative considerations, including indicative costs (C1), with host-country support presented as an optional criterion (C2). The limited distribution addendum provides the criterion-by-criterion results for the weighted criteria and the aggregated total scores, alongside the comparative information on indicative costs and any host-country support offered.</p> <p>The document also explains the standardized costing methodology and assumptions applied to all eligible proposals to ensure comparability across candidate cities, including cost-of-living index-based approach and the two-step costing model, with optional host-country support treated as an overlay only where explicitly offered.</p> <p>Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements. While not reflected in the indicative cost tables, a summary of the proposed host country contributions was included in the Limited Distribution document and is intended to inform Board decision-making. The draft decision text also outlines the Board’s expectations around such contributions. When host country agreements are confirmed, the contributions will be reflected in GCF’s budgeting process.</p>
<p>II. Assessment of proposals for regional presence</p>	<p>The list of setup costs and recurring operating costs should be comprehensive. Some cost elements appear underestimated, including a) additional</p>	<p>Finland - Switzerland</p>	<p>Thank you. To clarify the cost treatment, the document has been updated to specify that local services (e.g. administrative support, cleaning, translation and driver services) are assumed to be provided primarily through service contracts</p>

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	<p>human resources costs (new compensation frameworks, hardship allowances, mobility premium, costs of flights between the HQ and the office and within the region, etc.); b) additional burden and costs for the legal, risk and IT functions at HQ (ICT systems, cybersecurity, security, business continuity related short and long term costs at the HQ/globally).</p> <p>It is also unclear whether the recurring operating costs include additional staff (e.g. administrative support, cleaning, translation, driver, IT maintenance). Will all be under subcontract/outsourced or appear in the staff figures?</p>		<p>and are reflected under non-staff operating costs rather than within the staff establishment figures. The document also clarifies that any material incremental corporate service requirements at headquarters (including legal, risk and ICT support) will be reflected through the annual budget cycle as operationalization progresses.</p>
<p>II. Assessment of proposals for regional presence</p>	<p>Following board decision that regional presence shall be cost-effective and cost-efficient (Decision B.41/10 b-ii), cost-implications and cost analysis shall be a key element for the selection of regional presence. Furthermore, regional presence has consistently been described as cost neutral. The proposed selection, however, takes the highest-scoring weighted criterion without considering the estimated cost/savings. For example, Chile or Dominican Republic, with less than two points lower than Costa Rica, were not considered, but would offer significant lower ongoing running costs with savings, while Costa Rica costs would be higher compared to HQ.</p> <p>Some scenarios/proposals appear to result in a net increase in overall costs. We therefore request clarification on:</p> <ul style="list-style-type: none"> • How efficiencies will be generated at HQ to ensure budget neutrality; • Considering the reduction of staff and 	<p>Finland - Switzerland</p>	<p>Thank you. The assessment framework applies weighted criteria (A1-A4 and B1-B3) alongside non-weighted comparative considerations related to cost-effectiveness and long-term viability, including indicative costs (C1), with optional host-country support presented under criterion C2.</p> <p>To further support Board consideration of cost implications in host selections, the scenarios in Section III scenario analysis in Section V will be expanded to include additional host countries, including Chile and the Dominican Republic, alongside the existing scenarios.</p> <p>Section V presents scenario-level cost ranges, indicative net budget impacts and payback periods to support Board consideration of cost-effectiveness alongside the weighted assessment results. Costing is presented on an incremental basis relative to the current HQ-only construct; where scenarios imply net additional costs, corresponding efficiencies would be required at HQ over time to achieve budget neutrality.</p> <p>Establishment and operating costs will be tracked through the multi-year budget process and annual budget cycle, including engagement with the Budget Committee, with material variances reflected in subsequent budget submissions.</p>

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	<p>operations in Songdo, what specific cost reductions are expected in Songdo;</p> <ul style="list-style-type: none"> • Whether locations with higher operating costs than HQ are consistent with the objective of cost-efficiency; • How and at what intervals the Secretariat will report to the Board on establishment costs, operating costs, and progress toward budget neutrality. <p>We question that locations with higher operating costs than HQ have been selected and expect a clearer integration of cost considerations into the final selection.</p>		
<p>II. Assessment of proposals for regional presence</p>	<p>We would appreciate a clearer explanation on cost estimates included in the tables, with particular reference to staff costs derivation based on the COL index and the inclusion of offsets from host country support. This could be done with an example.</p> <p>In addition, staff levels used for staff costs derivation are quite consistent and should be motivated.</p> <p>Finally, while we acknowledge that developing PPP based salary scales for all candidates may result in a burdensome exercise, we wonder how close the COL index based method could get with respect to the PPP based one and, if relevant differences exist, a more precise estimation could be provided before a Board decision for at least a subset of countries (and/or only the countries shortlisted in the configuration scenarios).</p>	<p>Italy</p>	<p>Thank you. The indicative costing tables apply a standardized COL index-based approach and a common set of staffing and non-staff cost assumptions across all eligible host cities. This approach is used solely as a proxy for scenario level comparability, given that PPP based salary scales have not yet been developed for all host country candidates.</p> <p>Staff cost estimates are derived by applying the COL index to a consistent staffing profile aligned with the current regional programming headcount at headquarters, to avoid introducing bias across locations at this stage. The objective is not to predict final staffing or remuneration outcomes, but to enable like for like comparison across scenarios.</p> <p>Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements. While not reflected in the indicative cost tables, a summary of the proposed host country contributions was included in the Limited Distribution document and is intended to inform Board decision-making. When host country agreements are confirmed, the contributions will be reflected in GCF's budgeting process.</p>

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			To address the request, the Secretariat has added clarifying text that the COL index is used as an indicative proxy for scenario costing, while the implementation plan foresees applying PPP-based salary scales for Board-selected locations, subject to any required Staff Regulations adjustments following host selection.
II. Assessment of proposals for regional presence	We would like to thank the Secretariat for the comprehensive analysis which we agree is in line with previous Board decisions and the Terms of Reference agreed at B42, of the proposals they have received.	UK	Thank you. Your comment is noted.
II. Assessment of proposals for regional presence	During the technical session for Board Members, it was noted that staff costs make up a large proportion of recurring costs for each office and outpost. It is also noted in the draft document that staff costs are currently estimated given that a purchasing power parity (PPP)-based salary scales have not been developed for all eligible proposals, and that the Board will need to take a decision to confirm these local-based salary scales through amendments to the Staff Regulations. How much could overall costs projections change based on these amendments, should current estimates of PPP-based scales change? Does the Secretariat foresee any issues in the adoption of these amendments?	Canada - Belgium	<p>Thank you. The Secretariat agrees that staff costs are a key driver of recurring costs for each regional office and any outpost. At this stage, cost figures in the document are indicative and scenario-level. For clarity, the Secretariat has used a cost-of-living (COL) index-based approach as a proxy for location-based staffing costs, because PPP-based salary scales have not yet been developed for all eligible proposals.</p> <p>For clarity, the cost-of-living (COL) index method provides indicative, location-specific cost estimates. It is used as an interim proxy for the purchasing power parity (PPP) index produced through the International Service for Remunerations and Pensions (ISRP) system, which, unlike straightforward exchange rate conversions used for macroeconomic modelling and GDP comparisons (for example, by the World Bank and IMF), is designed around consumption baskets to support compensation equity across host locations. The finalized PPP indices will be developed and applied for Board-selected locations during implementation, subject to any required amendments to the Staff Regulations.</p> <p>Staff cost estimates are derived by applying the COL index to a consistent staffing profile aligned with the current regional programming headcount at headquarters, to avoid introducing bias across locations at this stage. The objective is not to predict final staffing or remuneration outcomes, but to enable like for like comparison across scenarios.</p> <p>Following Board decisions on the configuration and initial host selections, the Secretariat will develop and apply the PPP-based salary scales for those locations and will bring forward any required amendments to the Staff Regulations for Board consideration, in consultation with the Budget Committee.</p>

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II. Assessment of proposals for regional presence	Does the Secretariat foresee changes in staff retention/deployment interest based on the location chosen by the Board?	Canada - Belgium	<p>Thank you. The Secretariat expects that staff interest in relocation and retention outcomes will vary by host country/city, reflecting factors such as family considerations, safety and security, schooling, housing and health care, and overall living conditions.</p> <p>During implementation, the Secretariat will manage deployment through the gate-based rollout, starting with a small core team and scaling up as operational readiness is confirmed. The mobility framework is intended to support consistent and equitable deployments across regional offices and the potential outpost, including through location-based salary scales and related allowances that would be operationalized following Board selection of locations and any required Staff Regulations adjustments.</p> <p>The Secretariat will monitor staffing uptake, retention and vacancy risks during rollout and will report material implications, including any impact on cost assumptions or timelines, through established budget and administrative reporting</p>
II. Assessment of proposals for regional presence	<p>The methodology employed for developing the regional presence proposal, as well as the subsequent evaluation of the cities proposed, were adequate and robust.</p> <p>The approach ensured that the proposed structure is well-founded and strategically sound.</p>	Argentina, Bolivia, Brazil, Ecuador, Uruguay	Thank you. The feedback is noted.
II. Assessment of proposals for regional presence	Pp 14: Could you please clarify how “their respective region” is being defined in this context?	Chile, Colombia, Costa Rica and Honduras	Thank you. The Secretariat recognizes the concern raised regarding the reference to the “respective region” in the description of costing assumptions. This was an editorial error. The intended wording is “respective country”. The Secretariat will correct the text accordingly in the revised document, with no change to the underlying costing approach or results presented.
II. Assessment of proposals for regional presence	The interest lies in the functions and operations of the Outpost (SIDS context). As defined by the Secretariat based on previous decisions of the GCF Board: Outposts, where applicable, will function as extensions of the relevant regional office, operating	Kiribati	Thank you. The regional office and outpost operating model was defined in the GCF/B.42/12 discussed at B.42 and referenced in decision B.42/14. An outpost functions as an extension of the relevant regional office under the direction of the Regional Director, strengthening proximity for country engagement and operational coordination without duplicating decision-making authority. In this

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	<p>under the direction of the Regional Director, and will support country engagement, as well as undertake limited administrative/logistical responsibilities, without duplicating decision-making authority</p> <ul style="list-style-type: none"> • Estimated costs for all eligible countries/cities were derived using a cost-of-living index-based approach – This needs to be reflective of competitive market rates to incentivise staff and address relocation needs. (important to understand what the index uses as their upper or lower limits/scales within the index- does this provide a comparative analysis over the regional market remuneration rates and costs? • It is important that cost-effectiveness is applied at all levels, this would be addressed in the financial agreements/ host-country agreements between the GCF and the bidding country. • The established outpost need regional input and support where appropriate and the Secretariat is encouraged to also consult the regional agencies through the existing coordination mechanisms in place as some of the establishment arrangements could be shouldered by the Pacific Island Forum members (to be considered). • The regional outpost need to also carry more responsibilities in terms of decision making and reviewing of CNs and proposals. This would address the efficiency and effectiveness concerns mandated under the GCF. 		<p>context, the outpost will not create separate approval structures or parallel governance for concept notes or funding proposals. Approvals and fiduciary controls will continue to be exercised under the Secretariat’s established delegated authority and internal control framework, with headquarters retaining oversight functions.</p> <p>On costs, the figures in the document are indicative. Following the Board decision on host countries/cities, the Secretariat will apply Board-approved location-based compensation arrangements, including PPP-based salary scales for Board-selected locations and related mobility measures, and will reflect material implications through the established budget process.</p> <p>The Secretariat also notes the importance of multilingual engagement and will operationalize language capability through staffing, targeted training and translation support aligned with country needs, including for the Pacific.</p>

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	<p>The point on multilingualism needs to be applicable to country set up and especially in the context of the regional offices and the outpost proposed for the Pacific region.</p>		
<p>II. Assessment of proposals for regional presence</p>	<p>Given that SIDS are a priority group for the GCF, how has GCF factored in SIDS as potential hosts for GCF Regional Offices?</p>	<p>Maldives</p>	<p>Thank you. The Secretariat recognizes the importance of SIDS as a priority group for the Fund and confirms that SIDS countries that sent proposals were fully factored in both as potential hosts and as a core service constituency. At the same time, regional presence is designed as a geographic proximity exercise to bring the Fund closer to countries to improve access and strengthen day-to-day engagement.</p> <p>SIDS were eligible to submit hosting proposals on the same basis as other Non-Annex I Parties, and all eligible submissions were assessed consistently against the Board-approved terms of reference and criteria.</p> <p>All scenarios include a Pacific outpost to strengthen country engagement in that regional operating context. As set out in the document, outposts function as extensions of the relevant regional office under the direction of the Regional Director, supporting country engagement and limited administrative and logistical functions without duplicating decision-making authority.</p>
<p>II. Assessment of proposals for regional presence</p>	<p>Was any SIDS-specific evaluations done or were SIDS realities given any considerations? For instance, using programmatic portfolio already puts any SIDS region at a disadvantage due to limitations on portfolio size compared to other regions. How was this factored in, if at all?</p>	<p>Maldives</p>	<p>Thank you. The Secretariat recognizes the concern and clarifies that the scenarios were constructed to illustrate alternative geographic configurations for delivering country engagement more closely to client countries. The scenarios were developed using the call for proposals and the Board-approved terms of reference, with a view to ensuring global coverage under each option. The scenarios vary the number and geographic groupings of offices/outpost and, more generally, the way countries are clustered to balance proximity, connectivity, and operational effectiveness.</p> <p>Portfolio and country figures are presented as indicative context for workload and scale of engagement across the proposed geographic groupings. They were not used as a stand-alone determinant of whether a given geography should or should not be served through a regional office or an outpost.</p>

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			The intent of the scenarios is to support Board deliberation on different geographic configurations and their operational and cost implications, before any subsequent decisions on specific host locations.
III. Proposed configuration for regional presence	<p>Germany supports a configuration ensuring full global coverage while maintaining cost efficiency and operational coherence.</p> <p>Germany emphasizes that final decisions must remain anchored in the ToR framework and overall cost-efficiency.</p>	Germany	Thank you. Your comment is noted.
III. Proposed configuration for regional presence	Regarding the scenarios: We think that the huge portfolio and number of countries justify two offices in Africa	Germany	Thank you. Your comment is noted.
III. Proposed configuration for regional presence	We would like to receive additional information on the added value of the Pacific outpost in terms of connectivity (Fiji receives a score of only 5 - is travel time reduced?) as well as on the associated costs (including travel). We do not support the creation of any additional outposts beyond this one.	Finland - Switzerland	Thank you. In line with the Board-adopted terms of reference, outposts complement regional offices in areas where geographical distance, linguistic diversity or programmatic volume justifies closer proximity to countries. They function as integral extensions of the regional office, operating under the direction of the Regional Director and benefiting from the regional office's programming support and strategic oversight, including to support country engagement, local operational coordination, and limited administrative and logistical responsibilities (e.g. small operational budgets, mission/event coordination, supervision of local staff or consultants, and protocol/local logistics). The Pacific outpost is the only outpost proposed across all scenarios. Fiji's air connectivity score reflects the standardized A1 methodology, which was assessed using the IATA Air Connectivity Index at the country level, complemented by Secretariat analysis at city level based on available commercial air services and connection patterns to regional capitals and hubs.
III. Proposed configuration for regional presence	We have a strong preference for Scenario 3, offering maximum consolidation with only 3 regional offices. This is considered the option with the lowest implementation cost and the lowest worst-case run-rate exposure, and it is aligned with the Secretariat's current regional setup. Adding a second regional office for Africa would also mean addition to	Finland - Switzerland	<p>Thank you. Your preference is noted. The Secretariat has increased the visibility of the indicative staffing assumptions in the Board.</p> <p>The Secretariat will also convey to the Co-Chairs Finland-Switzerland's suggestion that, following the Board's decision on a configuration scenario, constituencies consider seeking convergence on the preferred host country/city from among the Secretariat's proposed host countries/cities.</p>

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	<p>managerial positions and costs compared to the current setup.</p> <p>It would be useful to add the current number of projects and the indicative number of staff for each office under each scenario as spelled out in footnote 9 on page 15.</p> <p>After a scenario has been selected, our preference is for the regions themselves to find agreement around the different remaining options, if possible.</p>		
<p>III. Proposed configuration for regional presence</p>	<p>On the role of the regional offices:</p> <ul style="list-style-type: none"> • How are regional offices anticipated to work with the civil society and private sector in their regions? • What is their responsibility in this regard? • How will multi-country programs that cut across several regions be managed? • What is the exact division of roles and responsibilities incl. monitoring between HQ and regional offices? • How are regional offices anticipated to work with other global, regional and national climate funds in order to strengthen GCF's coordination and coherence with these? • How will country-specific legal and HR issues be dealt with? 	<p>Finland - Switzerland</p>	<p>Thank you. The roles and responsibilities are set out in the Board in GCF/B.42/12 (section 3.2) and are reflected in the B.44 document's section on governance, roles and delegated authorities. In summary:</p> <ul style="list-style-type: none"> • Engagement with civil society and the private sector: Regional offices will support inclusive country engagement and partnership development across the climate finance ecosystem, guided by countries, including engagement with government, regional organizations, private sector, civil society, Indigenous Peoples, local communities and beneficiaries. Regional offices will also facilitate deeper engagement with regional and local private sector actors to support pipeline • Multi-country and cross-regional programming: Projects involving multiple regions will be actively engaged by the relevant regional offices, with coordination managed by the region with the highest number of participating countries, consistent with existing practices. • Division of roles between HQ and regions (including monitoring): Headquarters will retain strategic direction; institutional governance and decision-making; policy frameworks; and impact monitoring, evaluation and learning, alongside corporate and control functions (including legal services, HR and Board engagement).

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			<ul style="list-style-type: none"> • Coordination with other funds: As part of country engagement and partnership development, regional offices will actively seek complementarities and coherence with other funds and sources of finance to enhance impact and efficiency. • Country-specific legal and HR issues: Delegated authorities will be exercised within the Fund’s legal framework and internal control systems, with headquarters retaining corporate control functions, including legal and HR oversight; host-country requirements will be addressed through host country agreements and related implementation arrangements.
III. Proposed configuration for regional presence	<p>It is not fully clear from the document what was the rationale under the countries shortlist included in each scenario. If applicants from a certain region gathered around one particular candidate, and other criteria, such as volume of the portfolio, countries coverage and linguistic criteria informed the proposed configuration, that should be better explicated.</p>	<p>Italy</p>	<p>Thank you. The document has been updated to more clearly explain the rationale for the host country/city options included under each scenario. In developing the scenarios, the Secretariat sought to preserve meaningful Board choice while ensuring each option remains operationally workable in practice. Host country options were drawn from the higher-scoring eligible proposals in each relevant region under the Board-adopted weighted criteria. Where host locations that clearly fall into a statistically higher-performing tier of the results were included. When the candidates are ranked, there is a noticeable step change: a small group of front-runners scores well above the rest, with a clear gap to the next option. That gap is large relative to the normal spread of scores within each region, so the selections are not close calls among similar candidates. The Secretariat also proposed that scenario one includes an additional consideration to organize the two Africa-based offices as distinct language-specific hubs, strengthening multilingual engagement and service accessibility by ensuring operational capacity in major languages.</p>
III. Proposed configuration for regional presence	<p>Scenario 3 (consolidation into a single site in Africa) entails the lowest upfront cost (approximately US\$6.13 million) and the smallest worst-case increase in steady-state run-rate. From a purely financial standpoint, it may therefore be the most cost-effective option. We recommend not presupposing the establishment of two locations in Africa from the outset; instead, begin with one site and, after rigorously assessing the necessity of a</p>	<p>Japan</p>	<p>Thank you. We note your point that Scenario 3 offers the lowest one-time establishment cost and the lowest-case run-rate exposure because it consolidates Africa coverage into a single regional office.</p> <p>With respect to your request to elaborate the implications of a two-office Africa model, the Secretariat confirms that governance and operating arrangements would be guided by the principles of standardization/coherence and delegated authority, with clear accountability and oversight mechanisms (including decision</p>

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	<p>second site—and incorporating lessons learned from the initial implementation—consider on a phased basis whether to proceed with establishing a second location. Furthermore, establishing two regional offices in Africa means splitting the operation of current department for Africa. We ask Secretariat to elaborate further the impact of this split, including, but not limited to, decision making process, maintaining intra-regional balance in terms of priorities and management of each project.</p>		<p>rights, risk controls, and escalation pathways), as outlined in document GCF/B.42/12 and the B.44 Board document. In other words,</p>
<p>III. Proposed configuration for regional presence</p>	<p>Any configuration plan approved by the Board should not be construed as a commitment to establish all regional presences as outlined. The GCF should proceed stepwise, beginning with a single pilot office, and assess its effectiveness and cost implications before authorizing any additional offices. If an initial regional presence increases the GCF's operational costs, no further regional presences should be established until operational efficiency and cost neutrality (or savings) are demonstrated. We therefore reserve the right to seek amendments to the configuration in the future, based on evidence from actual implementation.</p>	<p>Japan</p>	<p>Thank you. The Board has decided to establish GCF regional presence and mandated the Secretariat to bring forward a configuration and initial host selections for regional offices and an outpost, without the requirement of a 'pilot' approach. Implementation will nevertheless be sequenced through the gate-based rollout and the conclusion and entry into force of Host Country Agreements. The Secretariat will report to the Board on the status of Host Country Agreement negotiations, establishment costs, operating costs, and progress toward budget neutrality.</p>
<p>III. Proposed configuration for regional presence</p>	<p>We appreciate the work that has gone in to come up with these configurations, and that they are in line with previous Board decisions to assess the regional groupings once the proposals had been received. We are particularly grateful to the Pacific region for coming to consensus on the office location in their region and encourage the secretariat to invite others to do the same.</p>	<p>UK</p>	<p>Thank you. The comment is noted.</p>
<p>III. Proposed configuration for regional presence</p>	<p>We would appreciate further information to understand how the 2 Africa offices set up would work in practice. Can you share more information on the rationale for sharing a regional director between</p>	<p>UK</p>	<p>Thank you. In a configuration with two Africa regional offices, the Secretariat's intention in modelling a single Regional Director that will oversee both offices to maintain a unified regional strategy and consistent decision-making, while limiting additional managerial layers and costs during operationalization. The Regional</p>

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	<p>both Africa offices in this scenario? How would this work in practice? Are there other functions that would be shared?</p>		<p>Director would retain overall accountability for the Africa regional programme, supported by functional teams in each location, with clear geographic coverage definitions and harmonized work planning and prioritization arrangements. Standard operating procedures, common reporting lines, and structured coordination with headquarters would be applied to avoid fragmentation and to manage cross-subregional issues, workload balance and escalation pathways. Corporate fiduciary and control functions (including legal, finance, human resources and risk oversight) would remain HQ-anchored, consistent with the delegated authority and standardization principles set out in GCF/B.42/12 and in the B.44 document.</p>
<p>III. Proposed configuration for regional presence</p>	<p>We welcome the comprehensive work and analysis undertaken by the Secretariat on Regional Presence. The presentation of the scenarios by the Secretariat was valuable and we acknowledge the difficulty in narrowing 47 options down to a possible 6 options across five different Geographic areas. The focus on total geographic coverage, which underscores the purpose of Regional Presence is very welcome.</p> <p>We would like to express our appreciation for the work and assessment undertaken by the Secretariat; however, we have some reservations regarding the way the results have been presented in the form of the three scenarios. The analysis appears to be heavily focused on identifying the specific country or countries in a particular region. We would rather consider a wider range of scenarios, including other variables and other criteria.</p>	<p>Ireland, New Zealand and Spain</p>	<p>Thank you. The comment is noted. The Secretariat presented scenarios to provide a manageable set of decision-ready options for B.44 that remain operationally workable and consistent with the operational principles adopted in GCF/B.42/12.</p>
<p>III. Proposed configuration for regional presence</p>	<p>We would also appreciate further clarification of the process and criteria used for the selection of the countries under consideration, in order to better understand how the shortlist was established in different scenarios.</p> <p>Acknowledging the helpful technical sessions and the</p>	<p>Ireland, New Zealand and Spain</p>	<p>Thank you. The Secretariat has added a new paragraph to address this comment, which explains how the scenarios and associated shortlists were developed. In summary, for each scenario, host options were drawn from the higher-scoring eligible proposals in each relevant region; shortlist sizes were calibrated based on the distribution of evaluation results to preserve meaningful Board choice; and scenarios were tested against indicative portfolio volume and country coverage to avoid operational bottlenecks. The Secretariat also proposed that scenario one</p>

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	opportunities for Q&As provided by the Secretariat and Executive Director, it would be useful to receive further clarification on how the results of the evaluation of proposals to host regional presence were reached and specifically how each location was then chosen for inclusion in the three scenarios presented.		includes an additional consideration to organize the two Africa-based offices as distinct language-specific hubs, strengthening multilingual engagement and service accessibility by ensuring operational capacity in major languages.
III. Proposed configuration for regional presence	In particular, an explanation would be welcome for geographic areas whereby countries scored very similarly overall but were omitted from the three scenarios presented by the Secretariat (e.g. Panama (84.8), Costa Rica (81.1), Dominican Republic (80.2) - Panama and Costa Rica were included in all three scenarios presented but omitted the Dominican Republic.	Ireland, New Zealand and Spain	Thank you. The point regarding closely clustered scores in the Latin America and the Caribbean sub-set is noted. To preserve meaningful Board choice where results are closely clustered, the Secretariat has updated the scenarios to broaden the set of host country/city options presented for Latin America and the Caribbean, including by adding Dominican Republic and Chile to the scenario options alongside Panama and Costa Rica.
III. Proposed configuration for regional presence	Morocco does not appear in Scenario 2, even though at a global level it ranks above Egypt. Could you explain in more detail these situations and your approach to Africa with regard to the classification of French-speaking and English-speaking countries? Could you please indicate which countries have been included in each category?	Ireland, New Zealand and Spain	Thank you. The comment is well noted. Scenario 2 was removed to streamline Board choice toward configurations that are both meaningfully differentiated and more likely to support timely convergence at B.44 given limited support towards scenario 2 compared with the other options, limited distinct trade-off relative to scenarios 1 and 3. Removing Scenario 2 therefore supports a more decision-ready package while still preserving meaningful choice between a consolidated configuration and a two-office Africa model, consistent with the design intent that scenarios remain operationally workable and anchored in agreed parameters.
III. Proposed configuration for regional presence	It is clear that the configuration of the regional presence, as it has been proposed, accurately and substantively reflects the current priorities and operational concerns emanating from this seat. The alignment between the proposal and the strategic needs is a critical factor in its future implementation.	Argentina, Bolivia, Brazil, Ecuador, Uruguay	Thank you. The feedback is well noted.
III. Proposed configuration for regional presence	Table 1: Please provide more detail on why the third scenario does not mention: “aligning with equity and inclusivity principles” since that scenario also aligned with those principles.	Chile, Colombia, Costa Rica and Honduras	Thank you. The Secretariat recognizes the point raised and confirms that the omission in Table 1 was an editorial oversight, not a substantive distinction. Scenario 3 was also developed in line with the same equity and inclusivity principles applied across all scenarios.

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			<p>To address this, the Secretariat has updated the Board document to explicitly reflect alignment with equity and inclusivity principles all scenarios. No change in the underlying scenario design or assessment is implied by this edit; it is intended solely to ensure the table accurately reflects the common principles applied across the options.</p>
<p>III. Proposed configuration for regional presence</p>	<p>Given the size, diversity, and complexity of the region, it is important to establish a minimum staff-to-country ratio to ensure adequate technical support, portfolio supervision, and sustained capacity-building across all beneficiary countries.</p>	<p>Chile, Colombia, Costa Rica and Honduras</p>	<p>Thank you. The Secretariat recognizes the underlying concern that regional presence must be resourced to provide adequate country engagement, portfolio oversight and sustained capacity support across all countries served.</p> <p>In developing the scenarios, the Secretariat anchored the indicative staffing profiles in the Secretariat’s current programmatic resourcing levels, using the existing distribution of functions and workload across programmatic teams as the baseline for estimating the staffing required to deliver the regional office and outpost functions under each scenario. A uniform staff-to-country ratio was not applied, as it would not be comparable across regions given differences in geography, travel time, portfolio maturity and complexity, linguistic needs, and demand for hands-on support. The Secretariat will manage resourcing based on workload drivers and service expectations.</p> <p>The Secretariat has clarified this further in the Board document.</p>
<p>III. Proposed configuration for regional presence</p>	<p>Sweden’s understanding of the decision at B42 was that it outlined an approach setting out one regional office per regional department, with the intention of keeping the Asia-Pacific office in Korea. We believe in the value of a small number of offices each of which maintains a good staff count, in order to have specialized competence gathered in one place. From our perspective the main task of offices in each respective region will be to review and prepare project proposals for board decisions, as well as monitoring and adapting management of the portfolio. We believe it will also be easier to ensure high integrity in implementation and reduced risks with a small number of units where directors have direct oversight.</p>	<p>Sweden</p>	<p>Thank you. The Secretariat notes Sweden’s preference for a smaller number of offices with sufficient staffing depth.</p> <p>The scenarios in Section III were developed to translate the Board-endorsed terms of reference into practical configuration options that provide global coverage while keeping headquarters in Songdo and strengthening proximity to countries through regional offices and, where relevant, an outpost.</p> <p>The scenarios were developed to reflect Board decisions, preserve meaningful Board choice, and remain operationally workable in practice. The starting point was Board-adopted guiding principles, including equity and geographic balance, and host options are drawn from the highest-scoring eligible proposals in each region. Each scenario was stress-tested against portfolio volume and country coverage to avoid configurations that would overload any one office or create operational bottlenecks. The Secretariat considered major working languages</p>

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	<p>Given the considerations outlined above, we support scenario 3.</p>		<p>across the countries served to support accessibility, engagement, and delivery. The objective is practical service reach, including for vulnerable and underserved countries, within the limits of what any given footprint can credibly cover.</p> <p>Africa has more options because it has the largest portfolio volume and country coverage; scenarios deliberately test one vs two offices, recognizing the region's geographic span and travel demands.</p>
<p>III. Proposed configuration for regional presence</p>	<p>We continue to consider the access for LDCs (and SIDs) as one of the most important issues and therefore the process of regional presence should benefit them foremost.</p>	<p>Denmark, the Netherlands and Luxembourg</p>	<p>Thank you. The Secretariat recognizes the importance of ensuring that the Fund's regional presence strengthens access and engagement for priority groups, including LDCs and SIDS, and confirms that all countries that submitted proposals were fully factored in both as potential hosts and as part of the service constituency to be supported.</p> <p>The scenarios in Section III were designed to translate the Board-endorsed terms of reference into practical configuration options that strengthen proximity to countries across all regions, including to LDCs and SIDS, through a geographic approach to "bring the Fund closer" for day-to-day engagement. Under each scenario, regional offices are intended to serve as the primary interface with countries in their respective region, and any outpost, where applicable, would function as an extension of the relevant regional office under the direction of the Regional Director. In other words, the offices and outpost are designed to serve their respective countries, including LDCs and SIDS, by supporting country engagement, partnership development, and programming and delivery support in line with the functions set out in the document.</p>
<p>III. Proposed configuration for regional presence</p>	<p>Failing that we ask GCF Secretariat to provide us with a shorter shortlist. Secretariat has been listing all countries/cities of presence from 1 to 43. It makes no sense to propose a scenario with any country city/below number 10 or 11. This makes no sense also not from the perspective from multilinguism. With multilinguism in place, there are enough relevant options available.</p>	<p>Denmark, the Netherlands and Luxembourg</p>	<p>Thank you. The Secretariat notes the request to limit host options to only the highest-ranked proposals. The Board document clarifies the approach used to develop the scenario shortlists.</p> <p>Candidate host country/city options under each scenario are anchored in the evaluation results and drawn from the higher-scoring eligible proposals in each relevant region. Where host locations that clearly fall into a statistically higher-performing tier of the results were included. When the candidates are ranked, there is a noticeable step change: a small group of front-runners scores well above the rest, with a clear gap to the next option. That gap is large relative to the normal</p>

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			<p>spread of scores within each region, so the selections are not close calls among similar candidates.</p> <p>The limited distribution addendum presents the weighted criterion scores and aggregated totals for all eligible proposals to support transparency on the underlying assessment results.</p>
<p>III. Proposed configuration for regional presence</p>	<p>In the case of SIDS, the configuration presents itself as favourable and considerable with a pass rating based on the assessment conducted by the Secretariat's evaluation team.</p> <p>From SIDS, applications were submitted by Fiji, Dominican Republic, Maldives, Seychelles, Belize, St.Kitts and Nevis, Cape Verde, Grenada and Vanuatu – this makes it a total of 9 from the SIDS constituency had shown interest in hosting the regional out-post.</p> <p>Fiji – 4 “Yes” listed in terms of meeting requirements for office space (subsidized lease for 1st 5 years); Office support (part of the lease agreement); Staffing support (secondments during initial period to support establishment of office); regional engagement and diplomatic coordinations capabilities.</p> <p>Comments:</p> <ul style="list-style-type: none"> • The role and responsibility of the regional out-post should not be duplicated with that of the Asia Pacific regional office • Question – will there be decision making roles of outpost? • Question – will the outpost be able to have the capacity to review and provide feedback on CNs and proposals? • Question- will the outpost only service the 14 	<p>Kiribati</p>	<p>Thank you. The Secretariat notes Kiribati's questions on the operating model for the Pacific outpost and confirms that, as set out in the document GCF/B.42/12, an outpost (where applicable) functions as an extension of the relevant regional office, operating under the direction of the Regional Director. The outpost is intended to strengthen country engagement in the Pacific operating context and to undertake limited administrative and logistical responsibilities, without duplicating decision-making authority. Accordingly, the outpost would not take delegated decision-making roles, nor replace the regional office's responsibilities.</p> <p>Within this operating model, the outpost would support country engagement and pipeline development, including practical support to counterparties during concept and proposal development, while formal internal review, clearance and decision-making processes remain as established under the Fund's policies and procedures. The outpost would serve the countries within its defined geographic coverage, in coordination with the relevant regional office.</p>

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	<p>Pacific Island Countries?</p> <ul style="list-style-type: none"> Question- What will the initial composition of staff look like to meet outpost responsibilities? <p>The configuration using 3 scenarios provided by the Secretariat has placed Fiji to host the regional outpost. With Panama or Costa Rica to host the Latin America and Caribbean regional office.</p>		
<p>III. Proposed configuration for regional presence</p>	<p>East Asia, Southeast Asia and South Asian countries at a disadvantage despite being invited to submit bids. Based on the configurations presented, it seems as though the Secretariat has unilaterally decided to not include any countries from East Asia, Southeast Asia and South Asia due to proximity to the GCF HQ in Korea. When and how was this decision, which is reflected by none of these countries being represented in any configuration, made by the Secretariat?</p>	<p>Maldives</p>	<p>Thank you. The Secretariat recognizes the concern raised and wishes to clarify that the scenarios in Section III are the product of a geographic proximity exercise to strengthen access and day to day engagement with countries.</p> <p>Recognizing that the Fund can operationalize only a limited number of regional offices and one outpost, the Secretariat developed the scenarios to provide global coverage while maximizing proximity to countries.</p> <p>In that context, and as reflected in the Board document, headquarters in Songdo is positioned to continue serving East Asia, Southeast Asia and South Asia effectively. The scenarios therefore focus on locations where regional offices or an outpost would extend the Fund's proximity and operational reach beyond what headquarters can provide.</p>
<p>III. Proposed configuration for regional presence</p>	<p>Why were East Asian, Southeast Asian and South Asian countries included in the call for proposals if the understanding of the Secretariat has consistently been that these regions would be served through the GCF HQ and that there were concerns to limit costs associated with regional presence?</p> <p>How has equity been ensured that the countries from East Asia, Southeast Asia and South Asia who were sent call for proposals information by the Secretariat, and subsequently submitted bids for regional offices, were considered fairly in the configuration, as they are currently not represented in any of the proposals by the Secretariat?</p>	<p>Maldives</p>	<p>Thank you. The Secretariat recognizes the concerns raised and wishes to clarify that (i) the call for proposals was conducted as an open, inclusive and transparent process, and (ii) the scenarios in Section III are the product of a geographic proximity exercise to strengthen access and day to day engagement with countries.</p> <p>In line with the Board decisions at B.41 and B.42, the call for proposals was launched before the Board's decision on the final configuration so that the Secretariat could develop evidence-based configuration scenarios and a costed implementation plan using concrete, site specific information, while making clear that submission does not imply selection.</p> <p>In that context, and as reflected in the Board document, headquarters in Songdo is positioned to continue serving East Asia, Southeast Asia and South Asia effectively.</p>

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	<p>As it is unfair to countries from East Asia, Southeast Asia and South Asia who submitted bids to be entirely omitted from all configurations presented by the Secretariat, can the Secretariat re-do the configurations to ensure fairness and mitigate the unilateral bias against these countries that are not visible or present in any configuration at all? Any configuration that does not take into account all countries that submitted bids, despite the region or proximity to Headquarters, is unfair to those countries, and this is not in relation to the actual process of selecting hosts, but entirely focused on the inclusiveness and equality within the process to all countries who put forth bids.</p>		<p>The scenarios therefore focus on locations where regional offices or an outpost would extend the Fund’s proximity and operational reach beyond what headquarters can provide.</p>
<p>III. Proposed configuration for regional presence</p>	<p>It is not clear from the configurations on whether any alternate outposts options were decided other than for the Pacific subregion. The Secretariat has since mentioned this was a decision based on the UN Geographic Regions and that ‘Asia Pacific’ could be split into ‘Asia and the Pacific’. Why was the Caribbean region not considered for an outpost in this regard, given their clear need as the largest SIDS subregion with the most amount of SIDS countries, and the clear distance from GCF HQ?</p> <p>Why weren’t any other non-SIDS regions, or non-SIDS majority regions, considered for outposts (such as Africa or Eastern Europe)? What efforts, if at all, have been undertaken by the Secretariat to determine options, feasibility and opportunities for outposts in other regions or subregions that are not the Pacific subregion? It seems the Secretariat has unilaterally decided the outcome of the single outpost</p>	<p>Maldives</p>	<p>Thank you. The Secretariat recognizes the concern raised. The Board decision B.42/14 provided for one outpost at this stage; accordingly, the Secretariat reflected one outpost in the scenarios for regional presence configuration. The Secretariat also wishes to clarify that the scenarios in Section III are the product of a geographic proximity exercise to strengthen access and day to day engagement with countries.</p> <p>The outpost included in all scenarios is intended to strengthen country engagement in the Pacific operating context. Other regions are addressed through regional offices that serve their respective countries within the defined coverage.</p> <p>The Secretariat did not “pre-decide” that only the Pacific could have an outpost. Rather, applying the parameters used for the scenarios and the definition of outpost as set out in document GCF/B.42/12, the additional value of an outpost was identified for the Pacific given the geographic distance and programmatic volume, with the outpost functioning as an extension of the relevant regional office.</p>

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	under this phase of regional presence without providing any alternate options for outposts.		
III. Proposed configuration for regional presence	Was any costing or evaluations done for a Regional Office for the Pacific subregion? Given the challenges the region faces, and clear priorities expressed by the Alliance of Small Island States to the GCF Secretariat at COP30, delegated authority was an integral need for SIDS when it comes to regional presence. Was this request considered at all?	Maldives	<p>Thank you. The Secretariat recognizes the importance of the Pacific operating context and the points raised regarding SIDS priorities and the scope of functions that would be most useful on the ground.</p> <p>Recognizing that the Fund can operationalize only a limited number of regional offices and one outpost, the Secretariat developed the scenarios to provide global reach and effective coverage across all regions, taking into account the programmatic volume and the number of countries served within each proposed coverage. In line with this, the Secretariat recommended that an outpost be created to cover the Pacific.</p> <p>The outpost is designed to function as an extension of the relevant regional office under the direction of the Regional Director, supporting country engagement and limited administrative and logistical functions, without duplicating decision making authority.</p>
III. Proposed configuration for regional presence	The Secretariat has mentioned they have stayed clear of merging non-traditional regions and sticking to UN Geographic Regions, yet there is a mix between Eastern Europe and Asia (Central and West Asia). Why was this approach applied solely for this area and not used to determine other mixed options for underserved regions like the Indian Ocean, which is transcontinental?	Maldives	<p>Thank you. The Secretariat recognizes the concern and clarifies that the configurations in Section III were developed as a geographic proximity exercise to strengthen access and day to day engagement with countries.</p> <p>The reference in the scenarios to a regional office covering Eastern Europe, Central Asia and the Middle East reflect the coverage construct aligned with the current Secretariat's regional structure to ensure practical proximity and workload balance across neighboring subregions. It is a pragmatic coverage approach for one regional office within the limited number of offices that can be proposed at this stage.</p>
III. Proposed configuration for regional presence	Given the number of South Asian countries that have expressed interest and submitted bids, clearly indicating the need for closer engagement with the GCF, could South Asia be included in the non-traditional mix that was included for Eastern Europe and Asia (Central and West Asia)? What would be the implications of adding South Asian countries to this configuration and could it be done?	Maldives	<p>Thank you. The Secretariat recognizes the suggestion and clarifies that the scenarios in Section III were developed as a geographic proximity exercise to strengthen access and day to day engagement with countries.</p> <p>As reflected in the Board document, headquarters in Songdo is positioned to continue serving East Asia, Southeast Asia and South Asia effectively. The scenarios therefore focus the proposed regional offices on coverage areas where an office would extend the Fund's proximity and operational reach beyond what</p>

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			<p>headquarters can provide, while providing global coverage within a limited number of regional offices and one outpost. The reference in the scenarios to a regional office covering Eastern Europe, Central Asia and the Middle East reflects the coverage construct aligned with the current Secretariat’s regional structure to ensure practical proximity and workload balance across neighboring subregions.</p> <p>Including South Asia within that coverage would reduce the geographic coherence of the proposed coverage area, increase the number of countries served by that office, and create overlap with headquarters coverage for Asia, with implications for workload balance, indicative staffing requirements, and cost. For these reasons, South Asia was not included in that office coverage in the scenarios presented at this stage.</p>
<p>III. Proposed configuration for regional presence</p>	<p>The exercise of developing a set of configurations should set out different regional configurations and options for outposts and offices. The outpost was never agreed to be in the Pacific by the Board, and the secretariat should have developed additional options for where the outposts could be, given that the Song-Do HQ can serve that region. Furthermore, Asia is by far among the most diverse regions housing nearly half of the global population. There should be a configuration that sets out at least 2 regional offices in Asia.</p>	<p>Saudi Arabia</p>	<p>Thank you. The Secretariat recognizes the request to consider additional configuration options, including alternative locations for the outpost and additional regional offices in Asia.</p> <p>The Secretariat also clarifies that the scenarios in Section III were developed as a geographic proximity exercise to strengthen access and day to day engagement with countries, within a limited number of regional offices and one outpost (as reflected in decision B.42/14) while ensuring global coverage.</p> <p>In this context, all scenarios:</p> <ul style="list-style-type: none"> • Include a Pacific outpost to strengthen country engagement in the Pacific operating context, where geographic distance supports the case for an outpost as an extension of the relevant regional office (under the direction of the Regional Director and without duplicating decision-making authority), and where the assessment results provided a clear top-scoring option (i.e., Fiji) to anchor the scenario design; and • Retain headquarters in Songdo and reflect that headquarters covers East Asia, Southeast Asia and South Asia, given proximity to those countries and the role of headquarters in supporting engagement and operations for that coverage.

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III. Proposed configuration for regional presence	<p>We observed that there is no continuity in the selection of countries across the different configurations, in particular on the selection of countries in Africa. Some countries, included in configuration 1, are excluded in other configurations - and the other way around. If a country is included in one configuration, they should be included in the other options as well. Since Egypt and Morocco achieved high scores in the assessment made done by the secretariat, they should be included in all configurations that integrate North and West Africa.</p>	<p>Saudi Arabia</p>	<p>Thank you. The Secretariat recognizes the concern regarding continuity across the scenarios, particularly for Africa, and notes the importance of the language lens.</p> <p>As set out in Section III, the scenarios are designed to facilitate structured Board consideration and each provides global coverage, while illustrating different configuration approaches within a limited number of regional offices. In that design, the selection of host locations is not driven only by aggregate assessment scores. It is also guided by the parameters reflected in the document, including portfolio volume and number of countries covered, the geographic coverage for each office, and language coverage needs for country engagement.</p> <p>The Secretariat also proposed that scenario one includes an additional consideration to organize the two Africa-based offices as distinct language-specific hubs, strengthening multilingual engagement and service accessibility by ensuring operational capacity in major languages.</p>
III. Proposed configuration for regional presence	<p>Among the different scenarios suggested for covering the African continent, it would be useful to further elaborate the potential benefits of a configuration with two offices (scenarios 1 and 2), and to explain precisely how these options align with the Secretariat's current regional setup and support linguistic reach. This could be addressed in the main body of the text rather than in the rationale section of the table 1 (page 5).</p> <p>It is also essential to emphasize the need to ensure a balanced distribution of portfolios among the different offices, to strengthen proximity, and to maintain overall cost neutrality.</p>	<p>France</p>	<p>Thank you. The Secretariat recognizes the concern regarding continuity across the scenarios, particularly for Africa, and notes the importance of the language lens. Balanced portfolio programming volume was indeed an important parameter when developing the scenarios.</p> <p>The Secretariat has further elaborated on each of the scenarios as requested.</p>
III. Proposed configuration for regional presence	<p>In addition to indicating the number of countries covered by each scenario in the table 1, it would be insightful to specify the population, number of LDC and SIDS countries of the area in question</p>	<p>France</p>	<p>Thank you. The Secretariat notes the suggestion to further disaggregate the information by specifying the population and the number of LDC and SIDS countries in each area covered under the scenarios presented in Table 1.</p> <p>At this stage, the Secretariat considers that the information currently provided is sufficient for the purpose of assessing the proposed configurations for regional</p>

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			<p>presence. The scenarios are designed to support a strategic and operational discussion, rather than to introduce additional demographic or categorical parameters.</p> <p>Should the Board consider that further analytical detail is required at a later stage, the Secretariat would revert accordingly.</p>
<p>IV. Implementation plan</p>	<p>Germany strongly supports a phased implementation approach, including:</p> <ul style="list-style-type: none"> • Sequencing of office establishment, • Clear staffing ceilings, • Regular performance and cost reviews, • Defined milestones for assessing efficiency gains. <p>The implementation plan should:</p> <ul style="list-style-type: none"> • Include clear safeguards against cost escalation, • Ensure robust internal control and oversight mechanisms, • Maintain HQ coherence and avoid duplication of functions. <p>Germany welcomes the intention to develop PPP-based salary scales once locations are confirmed.</p>	<p>Germany</p>	<p>Thank you. The Secretariat agrees on the importance of a controlled rollout and will implement regional presence through a sequenced, gate-based approach, including the conclusion of Host Country Agreements consistent with the GCF legal framework.</p> <p>Safeguards against cost escalation and duplication will be embedded through (i) clear role design and delegated authorities under the existing internal control framework, with headquarters retaining fiduciary and corporate oversight functions (legal, finance, HR and risk); and (ii) budget management and reporting arrangements.</p> <p>In particular, section V on budget implications sets out that the Secretariat will track establishment and operating costs, monitor the realization of efficiency gains and cost avoidance underpinning the budget-neutrality approach, escalate any material variances from assumptions and report through established budget and administrative processes, including regular engagement with the Budget Committee. Once locations are confirmed, the Secretariat will also work with HR to finalize location-specific salary scales, including the planned PPP-based approach, to be considered by the Board.</p>
<p>IV. Implementation plan</p>	<p>The document should not talk about “outposts” as a maximum of one is envisaged.</p>	<p>Finland - Switzerland</p>	<p>Thank you. We note the concern. The Secretariat uses the term “outpost” because the Board’s mandate under B.42 explicitly requests a recommendation for host countries of regional offices and an outpost, and GCF/B.42/12 defines how an outpost differs from a regional office. Under the current proposal, the Secretariat is not seeking approval for multiple outposts. The scenarios envisage a single outpost as an extension of the relevant regional office, operating under the direction of the Regional Director and without duplicating decision-making authority. Any future consideration of additional outposts would be brought to the</p>

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			Board for consideration and decision, consistent with the approach set out in document GCF/B.42/12.
IV. Implementation plan	<p>Further clarity is needed on the staffing model and redistribution of functions between HQ and regional offices:</p> <ul style="list-style-type: none"> • How many positions (particularly administrative and support roles) will be reduced in Songdo? (p.10 para 44) • What are the implications of administrative, HR, finance and security requirements on functions and staffing levels at regional and HQ levels (e.g. on headcount)? Have these been fully reflected in the costing assessment? (p.7 para29) • Page 15 indicates that staffing levels are aligned with existing regional department headcount at HQ. Does this imply that regional offices will be staffed entirely through redeployment, with no new recruitment? • Will affected staff be relocated, or will positions be replaced with local contracts? <p>What are the operational and resource implications for the IIU and other independent units? (para 54)</p>	Finland - Switzerland	<p>Thank you. The staffing and functional model is designed to extend existing regional programming capacity from headquarters to regional offices and potential outpost, while headquarters retains fiduciary and corporate control functions (legal, finance, HR, risk, ICT and oversight), consistent with the functional model adopted by the Board in GCF/B.42/12 and reflected in the paper.</p> <p>The indicative staffing figures used for costing are aligned with the current regional headcount for the regional programming teams at headquarters. In operational terms, the regional offices, and the outpost, are envisaged to be staffed in the first instance through the redeployment and relocation of existing staff from the relevant regional programming teams, complemented by limited operational support roles where required to ensure office functionality and duty of care, consistent with the Fund’s legal framework and Host Country Agreements.</p> <p>Staff assigned to regional offices or an outpost will remain subject to the same Staff Regulations. Location-specific salary scales would be established once host countries are selected and, as applicable, once the Board has considered the proposed amendments to the Staff Regulations and related implementing provisions to operationalize those scales.</p> <p>Independent units, including the IIU, are not part of the regional office staffing model and will remain under their existing arrangements.</p>
IV. Implementation plan	As the GCF is an instrument of the UNFCCC, it could consider making the most of existing UN buildings, also considering the ongoing UN80 reform. To minimize costs and better manage security and business continuity, is the Secretariat considering being hosted on UN premises?	Finland - Switzerland	Thank you. The Secretariat will consider cost-effective accommodation options during host country discussions, including where host countries propose suitable co-location arrangements (for example, on government or United Nations system premises), subject to due diligence and the negotiation of Host Country Agreements. Any such arrangement would be assessed case by case against operational requirements, security and business continuity considerations, ICT and information security needs, accessibility for country engagement, and consistency with the GCF legal framework and the Fund’s institutional independence. Where co-location is feasible and advantageous, it may contribute to cost containment; where it is not feasible, alternative premises arrangements

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			would be pursued. Any material cost implications would be reflected through the budget and related reporting processes.
IV. Implementation plan	<p>We strongly question the proposed 10-12% mobility premium to incentivize staff relocation to regional offices. We request clarification on:</p> <ul style="list-style-type: none"> • Whether the premium is intended as a one-off relocation incentive for current staff or as a permanent allowance; and, if so, the long-term cost implications of this measure. • The rationale for introducing such a premium, particularly given that improved job attractiveness and staff retention have been cited as benefits of regional presence; <p>A detailed justification including legal and cost implication of staff relocation (see also p. 11, para 53 (a) should be provided, including any additional allowances (e.g. hardship) that may apply.</p>	Finland - Switzerland	<p>Thank you. The mobility premium referenced in the staffing transition plan is intended as a one-time relocation incentive, not a permanent allowance. It is designed to support timely deployment of staff to Board-selected locations during the initial establishment phase.</p> <p>As such, the premium is treated as an establishment-related cost linked to implementation sequencing, rather than an ongoing run-rate cost driver. Existing benefits and allowances would continue to apply in accordance with the Staff Regulations and applicable administrative instructions; where location-based adjustments are required (for example, housing or home travel), they would be applied using the selected host country as the reference point and aligned with the proposed PPP-based methodology. Following the Board's selection of host locations, the Secretariat will bring forward proposed amendments to the Staff Regulations to operationalize the mobility framework, in consultation with the Budget Committee, for Board consideration.</p>
IV. Implementation plan	<p>We underline the importance of solid risk management and mitigation. We call for strong mitigation measures in place, in particular to minimize the risk of cost overruns and uncertainty around host-country contributions (for instance by anchoring them in host country agreements). (p. 11, para. 52(b))</p> <p>Does any of these risk areas cover political and security risks including e.g. political violence, natural disasters? (p. 11, para 53)</p>	Finland - Switzerland	<p>Thank you. Risk management and mitigation are embedded from the outset through both eligibility screening and the subsequent establishment process. As set out in the Board-adopted selection process (GCF/B.42/12), proposed host cities must demonstrate a baseline level of local conditions, including health care, housing, safety and security, climate, isolation and amenities. To be eligible, proposed host cities must also have an A or B rating in the ICSC Mobility and Hardship Classification, providing a baseline duty-of-care threshold.</p> <p>Beyond eligibility, the Secretariat will undertake location-specific due diligence as part of establishing each presence, including security and safety assessments and business continuity planning. Key mitigation measures, including host-country contributions and relevant support arrangements, will be anchored in Host Country Agreements consistent with the GCF legal framework. Implementation will follow a gate-based rollout, with office openings sequenced based on legal, security and operational readiness. Establishment and operating costs, along with progress toward budget neutrality, will be tracked through established budget</p>

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			and administrative reporting processes, with any material variances escalated and reflected in subsequent Board budget submissions, as appropriate.
IV. Implementation plan	<p>The proposed indicators push for a certain type of performance (deliver and disburse rapidly). It should also reflect the set “increase efficiency and effectiveness of operations” (Decision B.41/10 (iii)) and include qualitative indicators, measuring the quality of the projects and the quality of interaction with the countries, as well as on impact and administrative costs. Other countries in the region should be able to give their opinion (feedback loop) on the expected benefits of the regional office (B.41/14 para 22-28).</p> <p>The indicator “the number of regional climate finance coordination platforms” might lead to further proliferation/fragmentation of platforms, and does not say anything about the impact of those platforms, and may need to be revised.</p>	Finland - Switzerland	Thank you. The proposed indicators are designed to be practical and immediately reportable through established Secretariat reporting channels. They are intended to provide a balanced view of progress and will be presented with appropriate context, including on quality, results, and administrative costs.
IV. Implementation plan	We suggest including in the current document a plan for evaluating GCF’s regional presence, its effectiveness, efficiency, relevance, coherence, impact and sustainability.	Finland - Switzerland	<p>The Secretariat will assess and learn from the effectiveness of regional presence through the monitoring and reporting plan set out in the implementation section, which is integrated into existing monitoring and reporting processes and corporate systems. It will rely on a set of targeted indicators, periodic reporting to the Board, and existing assurance mechanisms, including internal audit as appropriate.</p> <p>Independent evaluation can also be pursued through existing evaluation arrangements, including the IEU’s work programme, as determined under established governance processes.</p>
IV. Implementation plan	While it is true that decision B.41/10 “Recognizes that the regional groups are comprised of Asia-Pacific, Africa, Eastern Europe, and Latin America and the Caribbean” and decision B.42/14 “Requests the Secretariat to prepare a comprehensive analysis and recommendation for host countries of regional offices	Italy	Thank you. The Board has decided to establish GCF regional presence and mandated the Secretariat to bring forward a configuration and initial host selections for regional offices and an outpost, without the requirement of a ‘pilot’ approach. Implementation will nevertheless be sequenced through the gate-based rollout and the conclusion of Host Country Agreements consistent with the GCF legal framework. The Secretariat will report to the Board on the status of host

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	<p>and an outpost”, this does not necessarily mean that the proposed configurations should entail at least one office per region from the very beginning. Likewise, the ToR for the call for proposal, which were adopted with the second decision, stated that “the objective is to select an initial set of host countries/cities in which to establish regional offices and potentially outposts as part of GCF regional presence”, without reference to a minimum number of offices per region.</p> <p>In our view, as expressed in several discussions around the topic and in response to previous consultations, the implementation plan should consider a gradual approach (e.g. 2 offices and 1 outpost), prioritizing most undeserved regions and/or regions where efficiency gains (in terms of, for example but not exclusively, portfolio volume prospective increase) can be expected, including taking into account relevant time zone differences with the HQ which may have hindered full representation in the GCF portfolio until now. In our view, the gate-based timeline presented doesn’t ensure that a gradual approach is undertaken.</p>		<p>country agreement negotiations, establishment costs, operating costs, and progress toward budget neutrality, and any future adjustments to the model would be subject to Board consideration and decision.</p>
IV. Implementation plan	<p>The Secretariat should adopt an incremental, phased approach to establishing regional presences and outposts, regardless of the scenario. From a resource standpoint, it is not realistic to open all regional offices simultaneously.</p>	Japan	<p>Thank you. The Board has decided to establish GCF regional presence and mandated the Secretariat to bring forward a configuration and initial host selections for regional offices and an outpost, without the requirement of a ‘pilot’ approach. Implementation will nevertheless be sequenced through the gate-based rollout and the conclusion of Host Country Agreements consistent with the GCF legal framework. The Secretariat will report to the Board on the status of host country agreement negotiations, establishment costs, operating costs, and progress toward budget neutrality, and any future adjustments to the model would be subject to Board consideration and decision.</p>
IV. Implementation plan	<p>Gate-based timeline - We support this approach, as understand it is not possible to give exact timelines to agreements such as the HCAs. We support the aim of</p>	UK	<p>Thank you. The Secretariat welcomes the constituency’s support for the gate-based approach and the aim to establish the first regional office by 2027, and potentially more, depending on the conclusion of the host country agreements.</p>

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	<p>having the first office set up by 2027, and encourage the Secretariat to keep the timelines as ambitious as possible, and ensure there are mechanisms in place for lessons to be learned from the first establishments to the offices in the other regions.</p>		<p>The implementation plan is structured to sequence establishment based on operational readiness and the conclusion of Host Country Agreements, rather than fixed calendar dates. The Secretariat will apply a standardized operating model across locations and will incorporate a structured “lessons learned” step between gates, drawing on early establishment experience (including operational controls, staffing deployment, administrative workflows, and host-country arrangements) to inform subsequent office openings in other regions.</p> <p>Progress, establishment and operating costs, and any material variances from budget assumptions will be tracked through established budget and administrative reporting processes, including engagement with the Budget Committee, and reported to the Board as appropriate.</p>
<p>IV. Implementation plan</p>	<p>Communication and engagement - We also encourage engagement with relevant NDAs and AEs in the region on the impacts and changes this will have on their work with the GCF. We also encourage communication with other national entities in the countries covered in each region, such as ministries of finance and other development/finance institutions. This is captured broadly in 'wider external visibility', but we should make sure this is also tailored to each stakeholder. The implementation of regional presence should be an opportunity to tell a good news story for the GCF here proactively, rather than solely focusing engagement on reactive responses to questions/concerns.</p>	<p>UK</p>	<p>Thank you. The Secretariat agrees that early and tailored communication will be important to ensure continuity and manage expectations as regional presence is established. Consistent with the functional model adopted by the Board, regional offices will serve as the primary interface with countries in their coverage, including engagement with NDAs and AEs on how the operating model will work in practice, how support will be accessed, and how responsibilities will be organized between headquarters and the regional office.</p> <p>As part of the gate-based rollout, the Secretariat will prepare stakeholder-specific engagement and communications plans for each region, which will include outreach beyond NDAs and AEs where relevant, such as ministries of finance, line ministries, development finance institutions and other key national counterparts. The Secretariat will also use existing channels and established reporting to keep stakeholders informed as offices become operational.</p>
<p>IV. Implementation plan</p>	<p>Staffing - Can you confirm if there will be HR support etc in each regional office/outpost to support staff based there, or will this all be based in HQ in Songdo?</p> <p>Can you confirm how salaries of any staff relocating from HQ in Songdo will change? Will they remain the same or change in line with PPP-based scales?</p>	<p>UK</p>	<p>Thank you. The functional model retains fiduciary and corporate control functions at headquarters (including legal, finance, human resources, and risk oversight), while extending existing regional programming delegation and workflows to staff operating from regional offices and any outpost.</p> <p>On staff compensation, staff deployed from HQ will remain under the Staff Regulations, with compensation operationalized through PPP-based salary scales for Board-selected host locations, together with a mobility framework.</p>

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			<p>The mobility premium is envisaged as a one-off lump sum payment of 10–12% (recoverable if the minimum service duration is not met), and existing benefits and allowances will continue to apply, with amounts adjusted using the regional location as the base reference where applicable.</p> <p>Following host-country selection, the Secretariat will bring forward proposed amendments to the Staff Regulations to operationalize these arrangements for Board consideration.</p>
IV. Implementation plan	<p>In this regard, when attempting to broaden the range of scenarios, it may also be worth considering a phased approach. We believe that gradual expansion would be beneficial in terms of cost-effectiveness and the learning process. That said, we see merit in the three gates outlined by the Secretariat, which will act as a form of “phased approach” for the various regional offices/outpost. Moving to a gated approach and tying progress to specific milestones, puts the onus on the regions themselves to meet milestones.</p>	<p>Ireland, New Zealand and Spain</p>	<p>Thank you. The Board has decided to establish GCF regional presence and mandated the Secretariat to bring forward a configuration and initial host selections for regional offices and an outpost, without the requirement of a ‘pilot’ approach. Implementation will nevertheless be sequenced through the gate-based rollout and the conclusion of Host Country Agreements consistent with the GCF legal framework. The Secretariat will report to the Board on the status of host country agreement negotiations, establishment costs, operating costs, and progress toward budget neutrality, and any future adjustments to the model would be subject to Board consideration and decision.</p>
IV. Implementation plan	<p>Will any other parts of the "framework" referenced in paragraph 41 require a Board decision?</p>	<p>Canada-Belgium</p>	<p>Thank you. Paragraph 41 refers to a staff mobility and equitable compensation framework that combines (i) administrative guidance for deployments and (ii) measures that may require Board approval through amendments to the Staff Regulations and Rules.</p> <p>In particular, Board approval would be required for any proposed amendments needed to operationalize location-based salary scales for Board-selected host locations and the associated mobility premium (including its design features such as being a one-off lump sum, recoverability if minimum service is not met, and any related eligibility rules). These changes would be brought forward for Board consideration once host locations are confirmed and following consultation with the Budget Committee.</p> <p>Other components of the framework are expected to be implemented under existing delegated authority and within the current legal and HR framework</p>

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IV. Implementation plan	Regarding multilingualism, how will the local language be integrated into the function of each regional office? Will relocated staff be required to develop proficiency in the local language?	Canada-Belgium	GCF's working language remains English. At the same time, multilingual engagement is already part of current practice and is expected to be strengthened through regional presence. As noted in GCF/B.42/12, language competency is considered in recruitment to ensure adequate linguistic coverage and culturally attuned engagement, and many country engagements already take place in local languages, supported by regional teams that collectively speak more than 60 languages. The Secretariat will continue to use translation and interpretation services as needed, and will provide targeted language training support for staff, as reflected in the B.44 implementation plan (including training up to proficiency level C1, where relevant to the assignment).
IV. Implementation plan	Pp 24: Please make the proper amendments so the gate approach proposed does not pre-judge the establishment of more than one regional office in 2027.	Chile, Colombia, Costa Rica and Honduras	Thank you. The Secretariat recognizes the concern that the gate-based approach should not be read as pre-judging that only one regional office would be established in 2027. To clarify this, the Secretariat has amended this respective paragraph to reflect that implementation is contingent on the timely conclusion of host country agreements and completion of the required gates, and that the Secretariat is working towards readiness to establish one or more regional offices and/or an outpost by 2027, rather than implying a single office. This framing preserves the intent of a gate-based timeline (readiness driven by completion of dependencies) while avoiding fixed-date assumptions about the number of presences that could be operationalized by that time.
IV. Implementation plan	Pp 27: Please mention who is part of the Executive Leadership Team (ELT).	Chile, Colombia, Costa Rica and Honduras	Thank you. At the moment, the Executive Leadership Team is comprised of the Executive Director, all Chiefs (Chief of Investment, Chief of Finance and Risk Officer, Chief of Strategy and Impact Officer, and Chief Operating Officer), General Counsel, Director of Governance Affairs, and Chief of Staff
IV. Implementation plan	Pp 41 (b): The PPP is part of the assumptions for the scenarios presented by the Secretariat? This might have a high weight on the decision on which country is selected. Therefore, please clarify that since the PPP will be developed until the decision has been taken, can this affect the assumption mentioned in section III?	Chile, Colombia, Costa Rica and Honduras	Thank you. The Secretariat notes the question regarding the use of purchasing power parity (PPP)-based salary scales and confirms that PPP is not being used at this stage to drive the selection of host countries or to shape the comparative design of the scenarios. As reflected elsewhere in the document, PPP-based salary scales have not yet been developed for all eligible locations and will be developed and applied only for Board-selected locations during implementation, including through any required amendments to the Staff Regulations for Board consideration. For the purposes of

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			<p>enabling a like-for-like comparison across scenarios, the Secretariat has therefore used a cost-of-living (COL) index-based approach as a proxy for location-based staffing costs at this stage.</p> <p>Once the Board has taken decisions on the configuration and host selections, the Secretariat will develop and apply PPP-based salary scales for those locations and will update cost estimates through the applicable budget and implementation processes, in consultation with the Budget Committee, as relevant.</p>
IV. Implementation plan	Pp 41 (c) Please add: “as applicable” since this will only apply to current staff.	Chile, Colombia, Costa Rica and Honduras	<p>Thank you. The Secretariat agrees that the text can be clarified. The paragraph has been updated accordingly to reflect that the mobility premium would only be applied for existing staff member to support timely deployment to regional offices and any outpost.</p>
IV. Implementation plan	This seat highlights the need to define minimum operational standards in terms of technical and sectoral staffing, in order to prevent overload and uneven service delivery, particularly in a region with high project volume and diverse institutional capacities.	Chile, Colombia, Costa Rica and Honduras	<p>Thank you. The Secretariat recognizes the importance of maintaining adequate technical and sectoral capacity to prevent overload and uneven service delivery. The regional presence configurations are designed to deliver the defined functions by bringing the Fund closer to countries.</p> <p>The Secretariat also clarifies that regional presence is primarily operationalized through the deployment of the Secretariat’s existing regional programmatic teams currently based at headquarters, which would be geographically positioned in regional offices and the outpost as they are established. The intent is not to redesign regional team structures as part of this exercise, but to strengthen proximity and day-to-day engagement. Any incremental adjustments to staffing levels or skill mix, if needed over time, would be addressed through normal workforce planning and within the establishment and budget approved through the Fund’s standard budgetary processes.</p>
IV. Implementation plan	This seat recommends that these indicators be explicitly linked to decisions on staff allocation, budget prioritization, and regional reinforcement, rather than being used solely for reporting purposes.	Chile, Colombia, Costa Rica and Honduras	<p>Thank you. The Secretariat takes note of the recommendation and confirms that the monitoring indicators are intended to support Secretariat decision-making, not solely periodic reporting. The indicators will be used to inform staff allocation, budget prioritization and, where warranted by operational demand and performance signals, targeted reinforcement of regional teams, within the approved administrative budget framework.</p>
IV. Implementation plan	This seat proposes establishing a formal comprehensive evaluation after five (5) years of operation to assess workload, effectiveness, and	Chile, Colombia, Costa Rica and Honduras	<p>The Secretariat will assess and learn from the effectiveness of regional presence through the monitoring and reporting plan set out in the implementation section, which is integrated into existing monitoring and reporting processes and</p>

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	demand, and to inform potential adjustments, including the creation of additional offices or sub-regional support mechanisms in LAC.		<p>corporate systems. It will rely on the set of targeted indicators, periodic reporting to the Board, and existing assurance mechanisms, including internal audit as appropriate.</p> <p>Independent evaluation can also be pursued through existing evaluation arrangements, including the IEU's work programme, as determined under established governance processes.</p>
IV. Implementation plan	We would prefer a sequencing of opening regional offices instead of having a full deployment of all offices at the same time. We understand that due to arrangements to be signed this already would lead to different speeds of establishing offices, nevertheless we suggest making this intentional and start with one office and learning from that.	Denmark, the Netherlands and Luxembourg	<p>Thank you. The Secretariat takes note of the preference for a sequenced establishment of regional offices rather than simultaneous deployment. The Board has decided to operationalize regional presence and requested the Secretariat to bring forward configuration options and initial host selections for regional offices and an outpost, without a requirement for a formal 'pilot' approach.</p> <p>Implementation will nevertheless be sequenced through the gate-based timeline and the timely conclusion of Host Country Agreements, consistent with the Fund's legal framework. In practice, this means establishment will proceed as readiness gates are completed, and different offices and/or the outpost may advance at different speeds depending on HCA progress and operational readiness.</p>
IV. Implementation plan	<p>To ensure the rollout approach and implementation of regional presence, the Host Country Agreements needed to be concluded and signed between the GCF and the Host Countries.</p> <p>Further review and consultations to ensure cohesiveness and clarity of the implementation plan needs to be held with the successful bidder (in this case and as proposed under each of the 3 scenarios: Fiji). While there are other bids from SIDS members such as Maldives, Seychelles and Vanuatu which are closer the Pacific region, the outpost needs to cater for their expectations in terms of service and support delivery.</p>	Kiribati	<p>Thank you. The Secretariat agrees that the timely conclusion and entry into force of Host Country Agreements (HCAs) is a critical dependency for the rollout of regional presence and is reflected in the gate-based implementation approach in Section IV.</p> <p>Following the Board's selection of the configuration and host locations, the Secretariat will engage the selected host country or countries to conclude the relevant HCA(s) and to finalize practical establishment arrangements, including premises and local services, staffing modalities, and operational protocols.</p> <p>The Secretariat also notes the importance of ensuring coherent service delivery across the Pacific operating context. Consistent with the operating model set out in document GCF/B.42/12 and reflected in decision B.42/14, an outpost functions as an extension of the relevant regional office under the direction of the Regional Director and serves the countries within its defined geographic coverage, in coordination with headquarters and the relevant regional office, without duplicating decision making authority.</p>

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IV. Implementation plan	The implementation plan does not clearly set out which offices will be rolled out first.	Saudi Arabia	<p>Thank you. The Secretariat notes the request for clarity on sequencing.</p> <p>The rollout is intentionally gate-based rather than date-driven, because key steps depend on negotiating, concluding and bringing into force host country agreements (including legal status and privileges and immunities). Accordingly, the Secretariat has not pre-designated a single “first” office in the implementation plan. Establishment will proceed with whichever selected host location(s) complete Gate 1 and reach operational readiness (Gate 2) first, and additional offices (and the outpost) may progress in parallel, subject to the timely completion of required gates and practical constraints (premises availability, ICT/security readiness, staffing logistics).</p> <p>To support transparency, the Secretariat will provide periodic updates to the Board on: (i) the status of HCAs and readiness gates across locations, (ii) establishment and operating costs, and (iii) progress toward budget neutrality, with lessons learned applied between openings.</p>
IV. Implementation plan	It's not clear exactly what would be delegated to regional headquarters. On decision-making, it should clearly set out what decisions would be delegated to regional heads. The roles and responsibilities designated to the Executive Director should not be delegated to heads as the Executive Director is entrusted by the Board to lead and guide the operations of this Fund.	Saudi Arabia	<p>Thank you. The Secretariat recognizes the request for clarity on delegated authorities. The governance, roles and delegated authority model for regional offices and any outpost follows the information that was shared in document GCF/B.42/12 and does not change the roles and responsibilities entrusted to the Executive Director.</p> <p>Regional Directors will be empowered with appropriate programmatic, administrative and representative functions, aligned with the GCF legal framework. Headquarters will retain fiduciary and corporate control functions and overall investment and operational governance and decision-making, including legal, finance, human resources and risk oversight.</p> <p>Operationally, the Secretariat will extend the existing delegation of authority and operational workflows currently applied to regional teams at headquarters to staff operating from regional offices and outposts, as applicable, to ensure continuity while remaining within the Secretariat’s internal control framework.</p>
IV. Implementation plan	The risks that are outlined in Paragraph 53 should be backed by the appropriate GCF policies to ensure that the operationalization of regional presence is backed	Saudi Arabia	Thank you. The Secretariat notes the request to more explicitly link the risk areas in paragraph 53 to the relevant GCF policies and procedures.

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	<p>by Board approved policies and procedures. For example, under integrity risks, the Policy on Prohibited Practices can be applied to substantiate the risks being faced. Each type of risk laid out should be substantiated by a relevant GCF policy.</p>		<p>Regional presence is anchored in the Board-approved risk management framework, which includes the risk appetite statement, non-financial risk policy, compliance risk policy, and risk register, all forming part of the GCF legal framework which includes, but is not limited to, its Board-adopted documents and policies, regulations, rules, instructions, procedures and guidelines).</p> <p>The Secretariat has reinforced this point in the final Board document.</p>
<p>IV. Implementation plan</p>	<p>Components under the Risk-Based Audit Framework should be consistent with current secretariat policies and procedures. If additional procedures are required, then they must be approved by the Board.</p>	<p>Saudi Arabia</p>	<p>Thank you. The Secretariat agrees that the risk-based audit and assurance arrangements for the operationalization of regional presence will be applied in line with the Fund’s existing Board-approved risk management framework and legal framework and will remain consistent with current Secretariat internal control and compliance mechanisms.</p> <p>Regional teams will operate under the same internal control frameworks, audit coverage, and current compliance mechanisms as headquarters.</p> <p>Where amended Board-approved documents or guidelines are required, the Secretariat would submit these to the Board for consideration through the applicable governance process; management-level procedures and tools to implement those requirements will be developed and updated by the Secretariat consistent with the Fund’s framework.</p>
<p>V. Budgetary implications</p>	<p>Germany reiterates that regional presence must be budget-neutral over the medium term. We recommend:</p> <ul style="list-style-type: none"> • Clear operationalization of budget neutrality within the multi-year financial framework. • Explicit clarification of how host-country contributions reduce net costs. • Sensitivity analysis showing break-even timelines. 	<p>Germany</p>	<p>Thank you. The Secretariat notes Germany’s emphasis on medium-term budget neutrality. As set out in the paper, the operationalization of regional presence is expected to be budget-neutral over time within the Fund’s administrative budget envelope and will be managed through the existing multi-year budgeting process. The indicative cost estimates reflect scenario-level assumptions and are intended to support structured Board consideration; they will be refined during implementation based on Board decisions and confirmed implementation parameters.</p> <p>Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements.</p>

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	<p>The PPP-based remuneration model is explicitly supported as a harmonized and equitable approach.</p> <p>Germany does not support configurations that structurally increase recurring expenditures without a clear pathway to offsetting efficiency gains.</p>		<p>While not reflected in the indicative cost tables, a summary of the proposed host country contributions was included in the Limited Distribution document and is intended to inform Board decision-making. When host country agreements are confirmed, the contributions will be reflected in GCF’s budgeting process.</p> <p>The Secretariat will monitor expenditures and any realized efficiency gains, engage the Budget Committee as appropriate, and reflect material variances in subsequent budget submissions to support continued oversight.</p> <p>To strengthen transparency on cost adherence, the Board document now includes two concrete indicators under the monitoring and reporting plan: (i) actual vs budget variance for establishment and ongoing costs (USD and %), with key cost drivers summarized in periodic budget reporting; and (ii) travel efficiency, tracked as total mission travel expenditure (USD) per year, disaggregated by mission type. These indicators will be used to monitor the pace of establishment and operating cost trends, and to test travel-related cost assumptions as regional presence is operationalized. Any material variance from planned assumptions will be escalated through management and reflected, as appropriate, in subsequent budget submissions to the Board.</p>
V. Budgetary implications	<p>An implementation strategy will allow progress even if comprehensive agreement has not yet been secured across the entire proposed network of all regions. This approach avoids a complete standstill and permits the immediate realization of benefits in areas where agreement is already firm.</p>	<p>Argentina, Bolivia, Brazil, Ecuador, Uruguay</p>	<p>Thank you. The feedback is well noted.</p>
V. Budgetary implications	<p>Please provide more details on the ongoing costs calculations to make sense of the differences; for example, why is there such a significant difference in the ongoing cost between Panama and Costa Rica even though the cost of living is lower in San Jose than in Panama City and Costa Rica offers office space free of charge and Panama does not.</p>	<p>Finland - Switzerland</p>	<p>Thank you. The indicative cost estimates were developed for all eligible proposals using a standardized set of cost items and assumptions, including standardized staffing assumptions by office type, to ensure comparability across locations. The estimates cover key non-staff costs (including office space, utilities and local services) and staff costs, which derived using a cost-of-living (COL) index-based approach and a standardized set of assumptions to ensure comparability.</p> <p>For clarity, the cost-of-living (COL) index method provides indicative, location-specific cost estimates. It is used as an interim proxy for the purchasing power</p>

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			<p>parity (PPP) index produced through the International Service for Remunerations and Pensions (ISRP) system, which, unlike straightforward exchange rate conversions used for macroeconomic modelling and GDP comparisons (for example, by the World Bank and IMF), is designed around consumption baskets to support compensation equity across host locations. The finalized PPP indices will be developed and applied for Board-selected locations during implementation, subject to any required amendments to the Staff Regulations.</p> <p>Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements. While not reflected in the indicative cost tables, a summary of the proposed host country contributions was included in the Limited Distribution document and is intended to inform Board decision-making. When host country agreements are confirmed, the contributions will be reflected in GCF's budgeting process.</p> <p>Following Board selection of locations, the Secretariat will refine cost projections using the agreed implementation model, confirmed host-country contributions and the PPP-based salary scales to be submitted for Board consideration through proposed Staff Regulations adjustments.</p>
V. Budgetary implications	Was the travel policy of the Secretariat already revised considering the greater proximity, and if not yet, when will it be done? In particular, what is the policy regarding traveling in business class?	Finland - Switzerland	<p>The travel policy will continue to be applied on the same basis across HQ and any regional offices or potential outpost.</p> <p>Eligibility for business class remains unchanged: business class may be provided for travel on official business when a single-leg journey is 9 hours or more; and for multi-leg journeys when the combined travel time is 11 hours or more (including up to 2 hours of connection time), provided the journey to the next destination resumes within 12 hours.</p>
V. Budgetary implications	We would appreciate a more detailed explanation of the strategy to reach cost neutrality over time and performance metrics to assess both cost adherence and operational efficiency gains (which directly impact the budget). Although we acknowledge the difficulty of providing concrete estimates for each	Italy	<p>Thank you. The Secretariat shares the emphasis on budget neutrality over the medium term and on having clear metrics to track cost adherence and efficiency assumptions.</p> <p>To strengthen transparency on cost adherence, the Board document now includes two concrete indicators under the monitoring and reporting plan: (i) actual vs</p>

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	category at the present moment, the assumptions provided are too general.		budget variance for establishment and ongoing costs (USD and %), with key cost drivers summarized in periodic budget reporting; and (ii) travel efficiency, tracked as total mission travel expenditure (USD) per year, disaggregated by mission type. These indicators will be used to monitor the pace of establishment and operating cost trends, and to test travel-related cost assumptions as regional presence is operationalized. Any material variance from planned assumptions will be escalated through management and reflected, as appropriate, in subsequent budget submissions to the Board.
V. Budgetary implications	<p>While the medium- to long-term objective is budget neutrality, upfront investment will be required. Host-country support could provide cost offsets; however, as such support is voluntary and not yet confirmed, it has not been reflected in the current estimates. Given that the nature and extent of host-country support could help reduce initial investment requirements, it should be explicitly taken into account when deciding host countries and cities, with more efforts to ensure host-country support proposed by candidate countries.</p> <p>With respect to travel costs, the documentation does not provide refined estimates for the frequency and unit cost of intra-regional travel. It is therefore unclear whether, depending on the operational design, there is scope to contain these costs; this should be examined.</p>	Japan	<p>Thank you. The Secretariat agrees that host-country support, where offered, can reduce net establishment and operating costs and is therefore relevant for Board consideration of host countries and cities. At the same time, support is voluntary, varies in scope and specificity across proposals, and remains subject to confirmation through concluded host country agreements. Any host-country contributions would be reflected only once confirmed through host country agreements and incorporated through the Fund's budgeting processes.</p> <p>Regarding travel, no net mission-related travel reductions are assumed at this stage. As regional presence is operationalized, travel efficiency will be tracked through periodic budget reporting, including total mission travel expenditure per year disaggregated by mission type, to test assumptions and manage costs.</p>
V. Budgetary implications	It would not be acceptable if establishing any regional presences or outposts were to increase overall operational costs compared with the current GCF, which operates without regional presences or outposts.	Japan	Thank you. The Secretariat notes Japan's emphasis that establishing regional offices/outposts should not increase overall operational costs compared with the current headquarters-only model. As set out in the paper, the operationalization of regional presence is expected to be budget-neutral over time within the Fund's administrative budget envelope and will be managed through the existing multi-year budgeting process and annual administrative budget submissions for Board consideration. Indicative estimates show a range from net savings of up to 2% to a net increase of up to 1% depending on the configuration and locations selected by the Board.

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			<p>Where ongoing savings are anticipated, implementation costs could be offset within approximately 3.5 to 5 years. Where additional costs are projected under a given configuration, the Secretariat would reflect the required efficiency gains and/or offsets through the multi-year budget planning process and annual budget submissions for Board consideration, consistent with the objective of budget neutrality over time; in such cases, budget neutrality could be expected to be achieved in approximately 7–10 years, depending on the scenario.</p> <p>Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements. While not reflected in the indicative cost tables, a summary of the proposed host country contributions was included in the Limited Distribution document and is intended to inform Board decision-making. When host country agreements are confirmed, the contributions will be reflected in GCF's budgeting process.</p>
<p>V. Budgetary implications</p>	<p>Section V states: “The Secretariat anticipates that initial set-up costs associated with regional presences will be offset by future efficiency gains and cost avoidance.” We would like clarification on what exactly is expected to offset the initial set-up costs. If this implies that the amount of the initial set-up costs will be balanced by cost reductions, please confirm that the offset is measured against the current GCF operational cost baseline (i.e., without any regional presences), rather than against the prior-year costs of each regional presence.</p>	<p>Japan</p>	<p>Thank you. The Secretariat notes Japan’s request for clarification on (i) what is expected to offset initial set-up costs and (ii) the baseline against which any offsets are assessed. As set out in the paper, the anticipated sources of efficiency gains and cost avoidance include lower staff costs, reduced home and educational travel costs, and improved operational efficiency in country engagement and portfolio support.</p> <p>At this stage, the Secretariat has not assumed net reductions in mission-related travel costs; while long-haul travel from headquarters may decline over time, intra-regional travel remains necessary and may, in some cases, increase depending on programming activities.</p> <p>Establishment and operating costs, together with the realization of efficiency gains and cost avoidance, will be tracked and reflected through the multi-year budget planning process and annual administrative budget submissions for Board consideration.</p>

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V. Budgetary implications	We would be grateful for further analysis of the budget implications when the configurations are agreed, so that the offers of host country support can be considered. We understand why this hasn't been considered in the current analysis, but it will have an impact on the overall costs.	UK	<p>Thank you. The Secretariat notes the UK's request for further analysis of budget implications once the Board has agreed the configuration and selected host countries/cities, so that any host-country support can be considered.</p> <p>Pending confirmation, the Secretariat will integrate regional presence requirements into the Fund's multi-year budget process and update cost projections through the annual budget cycle as assumptions are confirmed and operationalization progresses, including through engagement with the Budget Committee and subsequent budget submissions as appropriate.</p>
V. Budgetary implications	What is the proposed timeline for agreeing the associated budget for regional presence? Will this be discussed at B46 along with the admin budget approval, or will this be needed sooner?	UK	<p>The Secretariat notes the UK's question on the proposed timeline for agreeing the budget associated with regional presence, including whether this would be discussed alongside a future administrative budget approval. The Secretariat will integrate regional presence requirements into the Fund's multi-year budget process and update cost projections through the annual budget cycle as assumptions are confirmed and operationalization progresses, including through engagement with the Budget Committee and subsequent budget submissions as appropriate. Following the Board's decisions on configuration and host selections, the Secretariat will refine multi-year cost projections, including any confirmed host-country contributions, and reflect these through the established administrative budget process for Board consideration.</p>
V. Budgetary implications	The principle of budget neutrality (over time) remains key for many donor countries. We feel the specific budgetary implications for the short-listed potential host cities could be more clearly explained.	Canada-Belgium	<p>Thank you. The Secretariat notes the request to more clearly explain how budget implications differ across the proposed host countries/cities, which we have addressed in the final Board document. The indicative costing in Section V is incremental relative to the current HQ-only construct and is structured around three components: (i) one-time establishment and implementation costs; (ii) recurring non-staff operating costs; and (iii) recurring staff compensation costs. As reflected in Table 3 (previously table 2), these components vary by location, primarily due to differences in staff compensation under the proposed PPP-based remuneration approach and local operating cost factors (e.g, premises and security services), while potential host-country contributions are excluded at this stage.</p> <p>Table 4 (previously table 3) provides a consolidated comparison across scenarios and, for each scenario, presents two illustrative host-location combinations (lower-cost and higher-cost), drawn from the shortlisted set in Table 3, to show</p>

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			how location choices can affect the indicative steady-state net budget impact from Year 2 onward relative to the HQ-only construct.
V. Budgetary implications	<p>As per paragraph 67, "Where ongoing savings are anticipated, implementation costs could be offset within approximately 3.5 to 5 years.</p> <p>Where additional costs are expected, the corresponding efficiencies would be required to be made at HQ, and budget neutrality could only be expected to be achieved in approximately 7-10 years, depending on the scenario." What efficiencies have been identified as eventually leading to budget neutrality, considering the highest cost options in Table 3 would cost up to \$2 million annually?</p>	Canada-Belgium	<p>Thank you. As set out in the paper, the indicative offset categories underpinning the payback analysis are: lower staff costs, reduced home and education travel, and improved operational efficiency in country engagement and portfolio support. Table 4 (previously table 3) illustrates that, depending on host-location choices, steady-state net impacts can range from net savings to net annual costs of up to approximately USD 1.9–2.0 million relative to the current HQ-only administrative budget baseline.</p> <p>Where costs increase, the indicative payback logic assumes that corresponding efficiencies and cost avoidance would be realized over time within the administrative budget envelope through the multi-year budgeting process and annual budget cycle, with engagement of the Budget Committee.</p> <p>Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements. While not reflected in the indicative cost tables, a summary of the proposed host country contributions was included in the Limited Distribution document and is intended to inform Board decision-making. When host country agreements are confirmed, the contributions will be reflected in GCF's budgeting process.</p>
V. Budgetary implications	This seat emphasizes that cost considerations should not lead to under-resourcing of the LAC office and should be balanced with the need for sufficient technical capacity to support high-quality programming.	Chile, Colombia, Costa Rica and Honduras	Thank you. The Secretariat notes the point and confirms that cost considerations will be balanced with the need to maintain sufficient technical capacity for high-quality programming in all regional offices, including the Latin America and the Caribbean regional office. The indicative staffing profiles for each scenario are aligned with the Secretariat's current programmatic resourcing levels and workload distribution across programmatic teams and are intended to ensure delivery of the defined functions.
V. Budgetary implications	As regards the choice of the most appropriate venues, we believe that the description in the background document of what countries offer in terms of financial support, in kind or in other ways, is too vaguely described. This disfavours the countries with slightly	Sweden	Thank you. Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements. While not reflected in the indicative cost tables, a summary of the proposed host country contributions

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	higher cost levels, but who offer more generous support to GCF in establishing offices. For Sweden, the cost factor is an important consideration in choosing office locations.		was included in the Limited Distribution document and is intended to inform Board decision-making. When host country agreements are confirmed, the contributions will be reflected in GCF's budgeting process.
V. Budgetary implications	We continue to consider the costs involved of establishing regional offices a point of attention as well. The assumption that it will be a cost saving exercise is not our expectation and experience.	Denmark, the Netherlands and Luxembourg	Thank you. The Secretariat notes the point raised and clarifies that the Board document does not present regional presence as a "cost-saving exercise." Rather, it sets out an approach to strengthen proximity to countries and expects it to be budget-neutral over time, within the approved administrative budget envelope, while requiring an initial up-front investment to establish regional offices and any outpost.
V. Budgetary implications	<p>The operational budget as set in Table 2 (GCF/B.44/XX) – indicative cost profile and multi-year budget implications (65-66).</p> <ul style="list-style-type: none"> • The budgetary implication is estimated at USD 646,671 for the outpost roughly a range of 28% of the lowest implementation costs for regional office for Uzbekistan (USD 1,117,354) and 58% of the operational costs for the highest implementation costs set for Cote d'Ivoire (USD 2,365,219) • Fiji which will serve the SIDS Pacific Outpost is included in all 3 scenarios and is considered as financial manageable and offers meaningful savings in all 3 scenarios. • The Host-country Agreements, where contributions are included, may offset a portion of recurring operating costs. This is subject to a decision being made on the regional presence applications. • The budget proposed needs to be reviewed against the actual 	Kiribati	<p>Thank you. The Secretariat notes the observations. Table 3 (previously table 2) presents indicative establishment and operating cost estimates for comparability across locations. Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements. While not reflected in the indicative cost tables, a summary of the proposed host country contributions was included in the Limited Distribution document and is intended to inform Board decision-making. When host country agreements are confirmed, the contributions will be reflected in GCF's budgeting process.</p> <p>The Secretariat agrees that the indicative cost profile will be refined against actual operational needs during implementation planning and HCA negotiations, including confirmation of premises, lease terms and duration (including any time-bound subsidized arrangements) and the cost implications beyond any initial support period.</p> <p>The Board document includes concrete indicators to track cost adherence and operational efficiency, including (i) actual vs budget variance for establishment and ongoing costs (USD and %) with drivers summarized through periodic budget reporting, and (ii) travel efficiency tracked as total mission travel expenditure per year, disaggregated by mission type.</p>

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	<p>operational needs and to be discussed in depth with the host-country for the outpost (Fiji).</p> <ul style="list-style-type: none"> • Fiji will offer a subsidized lease for the first five years, what is the long-term financial strategy for the outpost once the lease expires? Will the costs be absorbed by GCF or a transition plan will need to be developed for year 6. • The budget is merely administrative expense, it would be helpful to link this budget with a performance outcome i.e. Outpost budget should generate a certain percentage increase in DAE project approvals etc 		<p>Portfolio outcomes (such as approval volumes) remain driven by country demand and pipeline readiness and will continue to be governed by the Fund's existing programming and approval processes.</p>
<p>V. Budgetary implications</p>	<p>The table which illustrates the costs should display the contributions of each host country. For some countries the numbers might appear lower; however, those countries may not necessarily be providing in-kind contributions to the same extent others do. This disadvantages those countries who might have higher costs but are providing additional support to launch regional offices and sustain them in the long run.</p>	<p>Saudi Arabia</p>	<p>Thank you. Host-country contributions have not been reflected in the indicative cost tables because they were noted as optional in the terms of reference adopted by the Board, vary in scope and specificity across proposals, and remain subject to confirmation through concluded host-country agreements. While not reflected in the indicative cost tables, a summary of the proposed host country contributions was included in the Limited Distribution document and is intended to inform Board decision-making. When host country agreements are confirmed, the contributions will be reflected in GCF's budgeting process.</p>
<p>V. Budgetary implications</p>	<p>Table 3, which provides the cost implications of potential scenarios, prejudices the different country configurations that the Board may chose should be deleted. It prejudices Board decision-making and sets out preferential configurations. Instead of including the lower-cost and high-cost configurations this table should outline the average cost of each configuration only.</p>	<p>Saudi Arabia</p>	<p>Thank you. The Secretariat recognizes the concern raised and clarifies that Table 4 (previously table 3) is intended to support Board consideration by transparently presenting the budgetary implications of the scenarios, not to prejudice the Board's choice or set out preferred configurations.</p> <p>The table presents the lower and higher indicative cost profiles within each scenario to show the range of establishment and ongoing costs that may arise depending on the host countries selected. Presenting only an average could mask</p>

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			material cost differences across eligible locations and reduce comparability across scenarios.
V. Budgetary implications	Budget neutrality should be considered as the worst case scenario, and we should favour scenarios that have cost-saving potential over the medium-term.	France	<p>Thank you. The Secretariat notes the view that budget neutrality should be treated as a prudent baseline and that scenarios with stronger cost-saving potential over the medium term should be preferred.</p> <p>As reflected in the document, the Secretariat’s approach is to maintain budget neutrality through costing assumptions, disciplined cost controls and host-country agreements that may offset a portion of establishment and recurring costs. At the same time, the primary purpose of regional presence is to strengthen proximity to countries and improve access and day to day engagement, and the scenarios therefore present transparent cost implications alongside operational considerations so that the Board can weigh these trade-offs explicitly.</p> <p>The Secretariat will continue to report through periodic budget reporting on establishment and operating costs, drivers of any variances, and progress toward budget neutrality, and will apply cost-effectiveness measures across implementation and steady operationalization.</p>
VI. Recommended actions by the Board	<p>Germany supports adoption of a configuration that:</p> <ul style="list-style-type: none"> • Strictly adheres to ToR evaluation. • Ensures full privileges and immunities. • Is operationally and financially sustainable. • Is implemented in a phased manner. • Includes periodic reporting to Budget and Risk Committees. <p>Mandates development of PPP-based salary scales.</p>	Germany	Thank you. The Secretariat notes Germany’s feedback.
VI. Recommended actions by the Board	We strongly recommend the signing of special anti-corruption notes by all BM/ABM before the meeting B.44.	Germany	Thank you for the suggestion. All Board Members and Alternate Board Members are required to comply with the Policy on Ethics and Conflicts of Interest for the Board of the Green Climate Fund (Conflicts of Interest policy), as well as the Policy on Prohibited Practices, both of which contains obligations to refrain from prohibited practices (corrupt practices and others). Pursuant to the Conflicts of Interest policy, all Board Members and Alternate Board Members are required to

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			sign the “Declaration of Impartiality and Confidentiality of members and alternate members of the Board of the Green Climate Fund and Advisers” which contains commitments regarding integrity and transparency.
VI. Recommended actions by the Board	In the mid-term we recommend to bring back the topic of liaison offices in addition to regional offices.	Germany	<p>Thank you. In-country networks comprise in-country GCF experts (i.e., liaisons) who support NDAs but do not replace GCF staff but complement it in their capacity-building function.</p> <p>The in-country network has been proposed in the Operational Modalities of the Readiness Strategy approved by the Board in B.37.</p> <p>The experts are part of the capacity building efforts provided by the Readiness Strategy under outcome 1.1 objective 1, are on demand and hence to be requested by the NDAs and financed by the readiness budget of each country.</p>
VI. Recommended actions by the Board	<p>We are particularly grateful to the Pacific region for coming to consensus on the office location in their region and strongly encourage other regions to do the same.</p> <p>However we understand this may be difficult and support the Secretariat in identifying a decision making pathway for this.</p> <p>Overall we support a transparent approach to voting, in line with existing board documentation, rather than confidential balloting.</p>	UK	<p>Thank you. The Secretariat welcomes and strongly supports efforts by countries within a region to engage in dialogue and, where feasible, narrow options or reach agreement on a proposed host location, as was achieved in the Pacific. Consistent with this, the Secretariat can facilitate and enable region-based dialogue among interested countries as part of pre-B.44 and intersessional engagement, while remaining mindful of political sensitivities and ensuring equal treatment of all interested hosts.</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is suggesting using confidential balloting as a special procedure. This procedure is suggested as it exists in the “Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted” (the Procedures), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision making has been included in the final Board document.</p>
VI. Recommended actions by the Board	We would like to explore the possibility of facilitating a process in which the countries within the regions	Ireland, New Zealand and Spain	Thank you. The Secretariat notes your suggestions and will convey it to the Co-Chairs.

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	<p>that have expressed interest in hosting an office could reach an agreement among themselves on the final location, as was done in the case of Fiji.</p> <p>We support the possibility of the Secretariat facilitating/enabling a process whereby countries with potential Regional Presence locations within a region undertake a dialogue to either reach an agreement or narrow down the potential locations, however we are mindful of the political sensitivities and potential for contention throughout this process.</p>		
<p>VI. Recommended actions by the Board</p>	<p>In the event that a vote is required, we would appreciate clarification on the proposed procedure, particularly to ensure that countries have sufficient time to consult with their capitals and seek feedback and guidance. There may be foreign policy issues we need to take into consideration.</p>	<p>Ireland, New Zealand and Spain</p>	<p>Thank you. The Secretariat notes the request for clarification of the proposed procedure should a vote be required.</p> <p>As reflected in the Board document (annex II), consensus remains the approach to decision making in line with the Governing Instrument and the Rules of Procedure.</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is suggesting using confidential balloting as a special procedure. The adoption of this procedure would require a decision by consensus from the Board. This procedure is suggested as it exists in the "Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted" (the Procedures)), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision making have been included in the final Board document.</p>
<p>VI. Recommended actions by the Board</p>	<p>Could the Secretariat please confirm how an anticipated "special" voting process would work? For example, would this be through the existing electronic system? If so, how would the system</p>	<p>Canada-Belgium</p>	<p>Thank you. The Secretariat notes the request for clarification on how the special procedure would operate if consensus cannot be reached.</p>

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	<p>ensure voting is kept secret? Further, could the Secretariat confirm the parameters of the special voting procedure, would simple majority prevail? Would there be additional voting rounds should no majority be reached on the first ballot? Will co-chairs be able to break any potential deadlock?</p>		<p>As further reflected in Section VI, consensus remains the approach to decision making in line with the Governing Instrument and the Rules of Procedure</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is suggesting using confidential balloting as a special procedure. The adoption of this procedure would require a decision by consensus from the Board. This procedure is suggested as it exists in the “Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted” (the Procedures)), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision making has been included in the final Board document.</p> <p>As a summary the process would comprise of the following:</p> <p>Step 1: The adoption of any special decision-making procedure, such as confidential balloting, would first require the Board to decide on that procedure by consensus.</p> <p>Step 2: Following a decision by the Board to adopt the special decision-making procedure in step 1, the Co-Chairs would propose, and seek the agreement of the Board, on how the rounds of balloting shall take place.</p> <p>Step 3: Confidential balloting would then be cast in rounds of balloting, consistent with the procedure set out in section VI of the Procedures and step 2 above. This would involve one ballot per Board member per round.</p> <p>Step 4: Following each round of balloting, ballots will be counted by the Secretary to the Board in the presence of independent observers, recommended to include the General Counsel and other officers from the Office of the General Counsel. The count of ballots shall not be revealed to the Board at any time. In the event that more than two options are being considered by the Board in the balloting process, in each round, the option with the least support would be eliminated from</p>

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			<p>subsequent rounds of balloting. This would continue until at least two-thirds of ballots cast in a single round support one option.</p> <p>Step 5: The outcome following the completion of step 4 would then be put to the Board for confirmation by consensus. In the event that at least one Board member expresses the view that they are unable to join consensus, the process set out in paragraph 35 of section VI of the Procedures would be followed.</p>
VI. Recommended actions by the Board	<p>If a consensus can be achieved regarding the regional configuration of one or more specific region(s)—encompassing the essential details such as the precise number of offices to be established and the selected host city for each—then the Board should take a decision to advance with the implementation of regional presence in this/these region(s), even if a broad agreement regarding all eligible regions cannot be reached at this stage.</p>	<p>Argentina, Bolivia, Brazil, Ecuador, Uruguay</p>	<p>Thank you. The Secretariat understands the suggestion that, where consensus is reached on one or more region(s), the Board should be able to take a decision to advance operationalization for those region(s) even if agreement is not yet achievable across all regions at this stage.</p> <p>The Secretariat takes note that the Board took a decision at B.41/10(b) that a regional presence shall be “equitably and geographically balanced among developing countries, taking into account the needs of those developing countries that are particularly vulnerable to the adverse effects of climate change”. Advancing operationalization of some regions in the absence of agreement on others would not appear consistent with the Board’s past decision on regional presence.</p> <p>The Secretariat confirms that this intent has been updated in the final version of the Board document.</p>
VI. Recommended actions by the Board	<p>We agree decision making should focus on agreeing on one of the scenario’s first.</p>	<p>Denmark, the Netherlands and Luxembourg</p>	<p>Thank you. Your comment is noted.</p>
VI. Recommended actions by the Board	<p>We would like to see regions agreeing on their preferred candidates. The Pacific SIDS have sat a good example, we would like to see other regions follow.</p>	<p>Denmark, the Netherlands and Luxembourg</p>	<p>Thank you. The Secretariat notes your suggestions and will convey it to the Co-Chairs.</p>
VI. Recommended actions by the Board	<p>The recommendations to the Board will need to be further reviewed in the constituency meetings at the pre-meetings of B.44</p>	<p>Kiribati</p>	<p>Thank you. Your comment is noted.</p>
VI. Recommended actions by the Board	<p>We have serious reservations regarding the Secretariat’s proposal to adopt a special decision-</p>	<p>France</p>	<p>Thank you. The Secretariat notes the request for clarification of the proposed procedure should a vote be required.</p>

Issue Category	Comment	BMs/Seats	Secretariat Response
	<p>making procedure and the use of a closed-session confidential ballot to select host countries and cities in the event that consensus cannot be reached. While we acknowledge that the regional presence should be implemented swiftly, introducing such a mechanism at this stage appears premature. Beyond the procedural aspect, the choice of regional presence is inherently strategic and politically significant. It would therefore be inappropriate to presume, even before negotiations have begun, that consensus will not be achieved.</p>		<p>As reflected in the Board document (annex II), consensus remains the approach to decision making in line with the Governing Instrument and the Rules of Procedure.</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is suggesting using confidential balloting as a special procedure. This procedure is suggested as it exists in the “Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted” (the Procedures)), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision making has been included in the final Board document.</p>
VI. Recommended actions by the Board	<p>Moreover, given the high political stakes involved, transparency is essential. A public vote would provide the necessary safeguards and help prevent any risk of undue pressure on the Secretariat.</p>	France	<p>Thank you. The Secretariat notes your suggestions and will convey it to the Co-Chairs.</p>
Annexes I – III – draft decision	<p>Germany recommends including explicit language on:</p> <ul style="list-style-type: none"> • Budget neutrality monitoring, • Legal safeguards regarding HCAs, • Phased operationalization, • Review clause after initial implementation period. 	Germany	<p>Thank you. The Secretariat has reflected these points more explicitly in the draft decision text. In particular, the decision now requests the Secretariat to advance operationalization in line with the implementation plan, to manage implementation with the objective of budget neutrality over time within the approved administrative budget envelope, and to reflect associated costs, efficiency gains and offsets through the Fund’s multi-year budgeting process and annual budget submissions for Board consideration, reporting on cost adherence using the indicators set out in the monitoring and reporting plan. In addition, implementation remains anchored in gate-based rollout approach, and the decision text continues to link commencement of operations to the conclusion and entry into force of host country arrangements, with reporting to the Board on the status of negotiations and any material issues as implementation progresses.</p>
Annexes I – III – draft decision	<p>It is important to leave enough time for the Board to analyze the different options and discuss them, both</p>	Finland - Switzerland	<p>Thank you. The Secretariat recognizes the importance of allowing sufficient time for the Board to analyse and discuss the options, both informally and formally, and</p>

Issue Category	Comment	BMs/Seats	Secretariat Response
	<p>in an informal and formal setting, before narrowing the choice.</p> <p>Given its importance for the GCF, we call to aim to take the overall decision on configuration and implementation by consensus. We would not be ready to confirm that all efforts at reaching consensus on the procedural arrangements have been exhausted, as this is the first Board meeting where we would discuss the matter.</p> <p>We recognize that a vote might be needed at a later stage on the location of individual offices, once there is Board agreement on the overall direction and further reduction of possible locations.</p> <p>We do not consider it appropriate to publish a document stating that all efforts have been exhausted before the first discussion has even taken place.</p>		<p>shares the emphasis on reaching decisions by consensus on the overall configuration and implementation approach.</p> <p>As reflected in the Board document (annex II), consensus remains the approach to decision making in line with the Governing Instrument and the Rules of Procedure.</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is suggesting using confidential balloting as a special procedure. This procedure is suggested as it exists in the “Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted” (the Procedures), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision making has been included in the final Board document.</p>
<p>Annexes I – III – draft decision</p>	<p>Could you explain on which basis you conclude that there is no conflict of interest for a board member serving a government that has submitted a proposal to host a regional office?</p>	<p>Finland - Switzerland</p>	<p>Thank you. The Secretariat recognizes the importance of safeguarding integrity and managing both actual and perceived conflicts of interest in the host selection process.</p> <p>The proposed approach is not intended to waive or dilute the Board’s ethics and conflict of interest requirements. Rather, it reflects a narrow point: the Secretariat is recommended to the Board that the fact that a government has submitted a hosting proposal does not, by itself, constitute a conflict of interest for its Board representative acting in an official capacity to ensure the application of the principles of inclusiveness and equity. The Policy on Ethics and Conflicts of Interest for the Board of the Green Climate Fund provides that “members of the Board and other Covered Individuals may be serving a government which in itself does not constitute a conflict of interest as meant in the Policy, provided that the relationship with the relevant government is disclosed”.</p>

Issue Category	Comment	BMs/Seats	Secretariat Response
			<p>Any situation involving a specific personal, financial, or other direct interest would continue to be addressed through the Board’s established disclosure and management mechanisms under the Policy on ethics and conflicts of interest for the Board (decision B.09/03(a)).</p> <p>To avoid ambiguity, the Secretariat has also clarified in the document that the Fund’s conflict of interest policy and related ethics requirements continue to apply to all decisions, and that only specific personal or direct interests would trigger conflict management measures, consistent with applicable policies.</p>
Annexes I – III – draft decision	It is unclear, in the document, if all decisions are intended to be taken by the Board at the same time at B.44.	Italy	Thank you. The Secretariat recognized the need to further clarify the decision-making process in section VI.
Annexes I – III – draft decision	We believe that, in accordance with the Governing Instrument and the Procedures for Adopting Decisions in the Event That All Efforts at Reaching Consensus Have Been Exhausted, it would be premature to assume that the Board will not reach consensus. Such an assumption risks setting a dangerous precedent for handling difficult decisions.	Italy	<p>Thank you. The Secretariat recognizes Italy’s concern that it would be premature to assume that consensus cannot be reached and agrees that consensus remains the primary approach in line with the Governing Instrument and the Rules of Procedure.</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is suggesting using confidential balloting as a special procedure. This procedure is suggested as it exists in the “Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted” (the Procedures), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision making has been included in the final Board document.</p>
Annexes I – III – draft decision	With regards to (f) “Decides that serving a government that has submitted a proposal to host a GCF regional presence does not constitute a conflict of interest for a Board member”; we believe that different opinions in the Board are likely to emerge, and therefore [does/does not] should be added and	Italy	<p>Thank you. The Secretariat recognizes Italy’s concern that views may differ on whether the draft decision should include an explicit statement on conflict of interest in relation to Board members representing governments that submitted hosting proposals.</p> <p>Greater clarity has been included in the final Board document, section VI. The Secretariat is recommending to the Board that serving a government that</p>

Issue Category	Comment	BMs/Seats	Secretariat Response
	bracketed in the draft decision. As a matter of fact, we believe it should constitute a conflict of interest.		submitted a hosting proposal does not, by itself, constitute a conflict of interest to ensure the application of the principles of inclusiveness and equity. Any specific personal or direct interest would continue to be assessed and managed case by case in accordance with applicable policies, including through recusal where required.
Annexes I – III – draft decision	Annex I - We want to further advance the internal dialogues before making more detailed comments in the appendices. For example: no discussions on subitems (b) and (c) have not taken place yet.	Chile, Colombia, Costa Rica and Honduras	Thank you. Your comment is noted.
Annexes I – III – draft decision	To be further reviewed in consultations with constituency members at the pre-meetings of B.44	Kiribati	Thank you. Your comment is noted.
Annexes I – III – draft decision	On Annex I, the draft decision on the decision-making approach and procedural arrangements, the Board must first aim to reach consensus prior to the decision being made. The steps must be taken in accordance with the procedures previously adopted by the Board. Furthermore, it's not clear which part of the Secretariat's assessment – decision para (a) – the Board will be taking note of. As it stands, we are not happy with the countries selected within the configurations and we ask that additional configurations are proposed based on our comments.	Saudia Arabia	<p>Thank you. The Secretariat recognizes the concerns raised and agrees that the Board's approach to decision making remains consensus in line with the Governing Instrument and the Rules of Procedure.</p> <p>As reflected in the Board document (annex II), consensus remains the approach to decision making in line with the Governing Instrument and the Rules of Procedure.</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is recommending using confidential balloting as a special procedure. This procedure is suggested as it exists in the "Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted" (the Procedures)), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision making has been included in the final Board document. Regarding the request for additional configurations, the Secretariat notes that the scenarios were developed as a geographic proximity exercise, within the mandate to present a limited set of feasible options that maintain global coverage.</p>
Annexes I – III – draft decision	In light of the considerations set out above, it appears more prudent at this stage to adhere to the standard	France	Thank you. The Secretariat notes the request for clarification of the proposed procedure should a vote be required.

Issue Category	Comment	BMs/Seats	Secretariat Response
	<p>decision-making procedure for the selection of the preferred scenario and host cities. Consequently, Annexes I and III would no longer be relevant.</p>		<p>As reflected in the Board document (annex II), consensus remains the approach to decision making in line with the Governing Instrument and the Rules of Procedure.</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is recommending using confidential balloting as a special procedure. This procedure is suggested as it exists in the “Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted” (the Procedures)), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision making has been included in the final Board document.</p>
<p>Annex IV – summary of operational risks</p>	<p>To be further reviewed in consultations with constituency members at the pre-meetings of B.44</p>	<p>Kiribati</p>	<p>Thank you. Your comment is noted.</p>
<p>Limited distribution document</p>	<p>Could you explain the results obtained under A1? Was the connectivity calculated based on time needed to reach the different locations in the region or on the number of existing direct flights?</p> <p>Can you give an idea of the difference between a scoring of 20 versus 15 or 10? Visual representation could be useful to understand the differences.</p>	<p>Finland – Switzerland</p>	<p>Thank you. A1 was assessed using the IATA Air Connectivity Index at country level, complemented by Secretariat analysis at city level based on available commercial air services and connection patterns to regional capitals and hubs.</p>
<p>Limited distribution document</p>	<p>A more visual and easy-to-read representation would help in the analysis of the Limited distribution Addendum, that should allow to compare not only scores based on the evaluation criteria but also total costs estimations.</p>	<p>Italy</p>	<p>Thank you. To improve readability and enable quicker comparison, the Secretariat will add a visual summary that presents each candidate’s total weighted score alongside the estimated total cost.</p>

Issue Category	Comment	BMs/Seats	Secretariat Response
Limited distribution document	Please can you share further how the Board should consider scores which have possible red lines in terms of privileges and immunities? What is the implication of these and how will they be worked through?	UK	<p>Thank you. The Secretariat recognizes the UK’s request for additional clarity on how the Board should interpret the privileges and immunities (P&I) scores in cases where potential “red lines” have been identified, and what the practical implications would be and how they would be addressed.</p> <p>In the assessment, P&I has been treated as a threshold legal safeguard rather than a factor to be traded off against other criteria. Where a proposal is assessed as presenting potential limitations or conditions that could constrain the Fund’s ability to operate as intended (including protections for the Fund, its staff and assets), this is flagged in the scoring narrative as a potential “red line” because it could create material legal and operational risk if not resolved.</p> <p>In practical terms, a “red line” flag does not predetermine the outcome, but it does signal that operationalization of a regional presence would need to be conditional on the issue being fully resolved through the host country agreement (HCA) negotiation process prior to operationalization. If the issue cannot be resolved to provide the required assurances, the Secretariat would not be in a position to recommend proceeding with establishment in that location, and would instead seek the Board’s direction on alternative arrangements.</p> <p>To clarify further, the Secretariat has added a footnote to the limited distribution document.</p>
Limited distribution document	A number of proposals included in the three scenarios proposed (e.g. Bahrain, Amman and Dakar) indicate that there are “red line limitations on staff immunities indicated” – What are the safeguards established to ensure these critical dependencies are resolved before proceeding, and what contingency framework is in place should they remain outstanding?	Ireland, New Zealand and Spain	<p>Thank you. The Secretariat recognizes the Ireland, New Zealand and Spain’s request for additional clarity on how the Board should interpret the privileges and immunities (P&I) scores in cases where potential “red lines” have been identified, and what the practical implications would be and how they would be addressed.</p> <p>In the assessment, P&I has been treated as a threshold legal safeguard rather than a factor to be traded off against other criteria. Where a proposal is assessed as presenting potential limitations or conditions that could constrain the Fund’s ability to operate as intended (including protections for the Fund, its staff and assets), this is flagged in the scoring narrative as a potential “red line” because it could create material legal and operational risk if not resolved.</p>

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			<p>In practical terms, a “red line” flag does not predetermine the outcome, but it does signal that operationalization of a regional presence would need to be conditional on the issue being fully resolved through the host country agreement (HCA) negotiation process prior to operationalization. If the issue cannot be resolved to provide the required assurances, the Secretariat would not be in a position to recommend proceeding with establishment in that location and would instead seek the Board’s direction on alternative arrangements.</p> <p>To clarify further, the Secretariat has added a footnote to the limited distribution document.</p>
Limited distribution document	To be reviewed	Kiribati	Thank you. This is noted.
Limited distribution document	Potentially identify which countries are SIDS and LDCs in the document, so that board members are able to see where these countries rank, given the GCF’s mandate to deliver impacts and results in these countries.	Maldives	Thank you. The limited distribution document has been updated.

II. Response matrix for Active Observers received on the draft document “Co-Chairs proposal on the Board workplan update for 2025–2027 Operationalizing GCF regional presence”

Issue Category	Comment	Secretariat Response
<p>General feedback</p>	<p>We are deeply concerned about the presentation of a draft decision that presumes efforts to achieve consensus will be exhausted, which is against practice as well as procedure. Additionally, the failure to integrate human rights considerations, consideration of civil society engagement, and true measures of effectiveness into the planning of this process heightens the risk that regional presence will not achieve its goals and could in fact pose a reputational risk to the GCF. We support regional presence, but this selection process and operationalization must prioritize people and communities in ways keeping with human rights-based climate action.</p>	<p>Thank you. The Secretariat also notes the concern that the proposed special decision-making arrangement could be perceived as premature. The intent has never been to suggest a replacement to consensus.</p> <p>As reflected in the Board document (annex II), consensus remains the approach to decision making in line with the Governing Instrument and the Rules of Procedure.</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is recommending using confidential balloting as a special procedure. This procedure is suggested as it exists in the “Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted” (the Procedures)), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision making has been included in the final Board document.</p> <p>The Secretariat conducted the assessment of the proposals and proposed a recommended configuration following the criteria approved by the Board via decision B.42/14.</p>
<p>I. Introduction</p>	<p>The missing description in para 5 (ff) should provide not only a listing of the engagements, but also a reflection of how the feedback received</p>	<p>Thank you. This was meant as a placeholder to be completed following all the consultations between the draft and final Board document.</p>

	<p>during consultations was taken into account and incorporated, as appropriate, in the approach to be shared with the Board for consideration/approval.</p>	
<p>II. Assess of proposals for regional presence</p>	<p>The results of the assessment should not just be shared in a limited distribution assessment (Addendum I) but should be made publicly available (even if needed with some assessment factors restricted) to the broader public. Rather than following a pro-active information disclosure approach in keeping with its own Information Disclosure Policy, the Secretariat is implementing a maximum secrecy approach. Among climate funds, this is not best practice, to which the GCF should strive. Recently, the FRLD in selecting the host country for its Board, similarly using a variety of assessment factors, made the full assessment of the applicants for host countries to the Board publicly available. See https://www.frl.org/sites/default/files/Host_country_committee_report_20240708.pdf The GCF should likewise strive for maximum transparency in assessing the options of such momentous importance as the selection of regional offices. The currently proposed process (with sharing the outcomes of the assessment only in a limited distribution form) is counter to the guiding principles that the Board adopted for the operationalization of regional presence of an open, inclusive and transparent approach [emphasis added].</p> <p>The reference to the cost-of-living index of host countries/cities, on which staff cost estimates for the regional offices are largely based – in and of itself a useful approach to ensure some equity for the staff compensation across the GCF, no matter where staff is posted – is an example of the extreme intransparency (through the limited distribution approach of the full assessment) that the Secretariat has chosen. This is not confidential, but factual information without value-proposition or proprietary information. The assessment of this important factor as well as the broader assessment should be accessible to the public as a matter of public accountability.</p>	<p>Thank you. The Secretariat recognizes the request for greater public transparency of the assessment results.</p> <p>The Secretariat has shared the detailed assessment results, including a structured summary of proposed host-country support, in the limited distribution addendum to support the Board’s decision-making. Host-country support was captured and summarized across the categories in the Board-adopted terms of reference, and any contributions remain subject to confirmation through concluded host country agreements.</p> <p>To strengthen transparency in the public package, the Secretariat has added a summary table in the public document showing the relative performance of the shortlisted host countries/cities included in the scenarios across the weighted criteria and total score (visual banding), alongside the published methodology and criteria.</p>

	<p>Regarding relevant host-country support proposed by countries, while some argument can be made that this information may be treated as proprietary/confidential, this also raises the suspicion for the wider public that offered host country support could carry a disproportionate weight in the shortlisting of country proposals and possibly outweigh some other criteria. As is always the case, transparency dispels suspicion. The host country/city selection and shortlisting would be important to be free from suspicion.</p>	
III. Proposed configuration for regional presence	<p>If linguistic coverage is set to be a priority of regionalization (and should be) the language should reflect that clearly. We suggest addressing 20(e) as follows: “Prioritize linguistic coverage across countries served, aligning regional capacity with major working languages to ensure equitable access, effective engagement, and high-quality delivery.”</p>	<p>Thank you. The Secretariat has addressed this comment in the final Board document.</p>
III. Proposed configuration for regional presence	<p>We seek clarification on if the statement in para 21, “with linguistic balance considered” indicates that for the “Central, North and West Africa” and “West Africa” constellations presented in Scenarios 1 and 2, respectively, there were any higher-scoring proposals from Anglophone countries that were deprioritized given the goals of a Francophone-serving office. More broadly, it would be helpful to know if there were any other considerations that deprioritized otherwise high-scoring proposals for any Scenario configurations.</p>	<p>Thank you. Thank you. The Secretariat recognizes the concern.</p> <p>As set out in Section III, the scenarios are designed to facilitate structured Board consideration and each provides global coverage, while illustrating different configuration approaches within a limited number of regional offices.</p> <p>In that design, the selection of host locations is not driven only by aggregate assessment scores. It is also guided by the parameters reflected in the document, including portfolio volume and number of countries covered, the geographic coverage for each office, and language coverage needs for country engagement.</p>
III. Proposed configuration for regional presence	<p>Para. 21 indicates that the presentation of the host countries for the regional configuration are presented in an order reflecting the score of the A1 criterion (as a ranking within a ranking). This statement is a meaningless effort in justification of some ranking that is otherwise completely intransparent. As indicated earlier, an annex with the full set of overall scores/assessment against all criteria, should be made</p>	<p>Thank you. The Secretariat recognizes the request for greater public transparency of the assessment results.</p> <p>The Secretariat has shared the detailed assessment results, including a structured summary of proposed host-country support, in the limited distribution addendum to support the Board’s decision-making. Host-</p>

	<p>publicly available.</p>	<p>country support was captured and summarized across the categories in the Board-adopted terms of reference, and any contributions remain subject to confirmation through concluded host country agreements.</p> <p>To strengthen transparency in the public package, the Secretariat has added a summary table in the public document showing the relative performance of the shortlisted host countries/cities included in the scenarios across the weighted criteria and total score (visual banding), alongside the published methodology and criteria.</p>
<p>III. Proposed configuration for regional presence</p>	<p>Table 2 – It is important to note in some of the proposed countries/host cities, repression of civil society engagement and activity is much more pronounced than in others (without naming countries specifically). This should have been a formal assessment criterion as the GCF observer network has highlighted in an earlier submission; while this was completely ignored by the Secretariat, this should nevertheless come into play as the consideration of host countries/cities of apparently other relatively similarly scoring assessment factors is ongoing. Situating regional offices in countries that are undercutting basic rights of civic and public participation and civic space could send the wrong message, negatively impacting the GCF's reputation as well as its project design and implementation. Prioritizing the protection of civil liberties must be incorporated at this stage of consideration. Ultimately, the GCF is serving beneficiary people and communities, not governments.</p>	<p>Thank you for your comment. The Secretariat values the perspective that the selection and operation of regional offices must align with the GCF's commitment to inclusivity, and accountability.</p> <p>The eligibility and evaluation criteria adopted by the Board via decision B.42/14 were designed to establish the minimum operational conditions required to host a GCF regional office. Their purpose is to ensure that any selected location can support core functions effectively.</p> <p>Other considerations will be considered through the provisions of the host country agreement.</p>
<p>IV. Implementation plan</p>	<p>On multilingualism: Regionalization of the Fund should serve as a driver to expand the Fund's documentation and engagement in languages relevant to each region. The operationalization of regional presence provides a concrete opportunity to advance multilingualism in practice, not just through staff language capacity (which should prioritize staff members to be fluent in the language of the region), but through systematic expansion of document translation, stakeholder engagement, and accessibility of Fund processes in regional languages. This should be pursued in parallel with the establishment of regional</p>	<p>Thank you. The Secretariat appreciates that multilingual engagement is integral to strengthening access and country ownership. Regional presence will reinforce this in practice by positioning staff closer to countries and partners in multilingual environments.</p> <p>Multilingual engagement with partners is already part of current practice, as noted in GCF/B.42/12 and in the B.44 Board document regarding the operationalization of regional presence.</p>

	<p>offices to ensure multilingualism is embedded from the outset rather than addressed retrospectively, and to make the efforts of regionalization as efficient as possible.</p>	<p>GCF’s approach to multilingualism, including the translation of policies and critical operational guidance, is institution-wide and will continue, irrespective of the configuration of regional offices.</p> <p>Any changes to the current multilingualism approach, including any future Board consideration to broaden the approach to multilingualism by enabling submissions in additional languages (e.g., concept notes and/or funding proposals), would fall under the multilingualism mandate provided by the Board to the Secretariat and would be considered independently of this regional presence package.</p>
<p>IV. Implementation plan</p>	<p>Risk management evaluation should note risks not only to the personnel and fund operations, but also risks related to all stakeholders engaged with the Fund, including civil society. In doing so, the risk assessment strategy should incorporate considerations on human rights risks, particularly to freedom of expression and association, to ensure that civil society participation does not come at the expense of regionalization plans. This should be incorporated as a specific criteria on risk, controls, monitoring and escalation.</p> <p>This listing of risks also excludes reputational risk, which is important to qualify, assess, and consider. One of the key factors influencing reputational risk, along with staff health, safety, and security (further comments below), is of course linked to the opportunity of stakeholders, including civil society and Indigenous Peoples, to engage in the Fund. The role of the Fund will be perceived through its greater interactions with its stakeholders and the public.</p> <p>Reputational risk is thus also shaped by issues related to the perception of the country and its perceived alignment with the goals of climate action that is transparent, based on human rights, and benefitting communities with identified needs as well as vulnerabilities. There is substantial reputational risk in elevating a country as host country for a GCF regional office if there are known</p>	<p>Thank you. The Secretariat recognizes the point. Risks related to human rights, including risks affecting freedom of expression and association and the ability of civil society to participate meaningfully, are primarily addressed at the project and programme level through the Fund’s existing legal framework, safeguards and accountability arrangements, including stakeholder engagement requirements and grievance mechanisms. Regional presence is not intended to introduce a new host-selection criterion on these issues.</p> <p>At the same time, the Secretariat will manage any office-level operational risks that could affect stakeholder engagement in practice through the Fund’s existing risk management and assurance arrangements and in accordance with the GCF legal framework (such as, but not limited to, its Board-adopted documents and policies, regulations, rules, instructions, procedures and guidelines), including through controls, monitoring and escalation under the gate-based rollout and Host Country Agreement process, as applicable.</p>

	issues of bad governance, including but not limited to human rights and civil society repression, corruption, and aggression against neighbor states.	
IV. Implementation plan	The measures of “efficiency” as proposed in the monitoring and implementation plan 57(b), overlook any potential measures of effectiveness, which may be undermined by measures of efficiency. Indeed, these measures fail to consider the qualitative information that should be improving, not least in relation to Indigenous Peoples, following the IEU evaluation revealing the inadequacy of the implementation of the Indigenous Peoples Policy, and in relation to gender, given the upcoming updated Gender Action Plan, which may capture proposal-level data on gender among its indicators, as did the GAP 2020-2023. A shorter time to approval is not a positive measure if indeed measures that will contribute to the effectiveness of the project’s implementation, or even its continuation, are not undertaken with adequate intention, capacity, and resources. Simply tracking how quickly funding is disbursed is inadequate without pairing with measures of quality and impact relating to how that funding is deployed.	<p>Thank you. The Secretariat recognizes the concern and clarifies that the “efficiency” indicators in paragraph 57(b) are intended to monitor the operational performance of establishing regional presence (for example, cost adherence and travel efficiency), rather than to serve as measures of programme or project effectiveness.</p> <p>The Secretariat agrees that effectiveness, quality and impact are primarily assessed and monitored at the project and programme level through the Fund’s existing policies, results and monitoring frameworks, including the implementation of the Indigenous Peoples Policy and gender-related commitments reflected in the Gender Action Plan. Regional presence is intended to strengthen proximity and day to day engagement to support delivery of these existing requirements, not to substitute or reframe project-level effectiveness monitoring.</p>
IV. Implementation plan	On the monitoring and implementation plan (para. 57f), as a purported goal of the regionalization is to bring the activities to the GCF more in line with countries’ needs and requests, and this includes a wide range of stakeholders, including from civil society, Indigenous Peoples and local communities, a key indicator for “Strategic engagement and partnerships” should also include the extent to which regionalization has improved the outreach to and engagement with a diverse set of stakeholders and in particular those groups and communities supposed to benefit from GCF activities. Restricting a measurement of regionalization success in this context to co-financing and regional climate finance coordination platforms is deeply insufficient and a misreading of what is partnership and strategic for the success of regionalization.	<p>Thank you. The Secretariat recognizes the point that “strategic engagement and partnerships” should not be interpreted narrowly and that meaningful outreach and engagement with a diverse set of stakeholders, including civil society, Indigenous Peoples and local communities, is important to the success of regional presence.</p> <p>Stakeholder engagement outcomes are primarily governed and monitored at the project and programme level through the Fund’s existing policies, safeguards and accountability arrangements.</p>
V. Budgetary	We agree that potential host-country contributions should not factor	Thank you. The Secretariat recognizes the request for greater public

<p>implications</p>	<p>whatsoever into budgetary considerations, as they are “as they were optional, vary in scope and specificity across proposals, and remain subject to confirmation through host country agreements,” (para. 61) but as stated above, they should still be disclosed as a matter of transparency.</p>	<p>transparency of the assessment results.</p> <p>The Secretariat has shared the detailed assessment results, including a structured summary of proposed host-country support, in the limited distribution addendum to support the Board’s decision-making. Host-country support was captured and summarized across the categories in the Board-adopted terms of reference, and any contributions remain subject to confirmation through concluded host country agreements.</p> <p>To strengthen transparency in the public package, the Secretariat has added a summary table in the public document showing the relative performance of the shortlisted host countries/cities included in the scenarios across the weighted criteria and total score (visual banding), alongside the published methodology and criteria.</p>
<p>VI. Recommended actions by the Board</p>	<p>A suggestion of a “special decision-making procedure” for the selection of regional offices and any outpost is entirely inappropriate in the context of a Secretariat paper for Board consideration. At best, the Secretariat could point out if the Board has used special procedures in the past, what they were and present options for the Board’s consideration if and how they might apply those (such as procedures used in the context of selecting South Korea as the host country for the Fund’s headquarters or the selection of the Executive Director from a short-list). There is also no clarity what that special procedure would involve or look like in this public, written document. Note that voting (which the exception of the selection of the initial host country for the Fund headquarters and the selection of the Executive Director in a special voting procedure - which the Board agreed beforehand to and with results presented as the consensus of the Board) based on the determination of all efforts of reaching consensus having been exhausted has been applied only to the approval of projects, but not to policy matters. The understanding of the Board at the time the voting decision was made that this would not apply to policy matters is part of the formal record of Board proceedings.</p>	<p>Thank you. The Secretariat notes the request for clarification of the proposed procedure should a vote be required.</p> <p>As reflected in the Board document (annex II), consensus remains the approach to decision making in line with the Governing Instrument and the Rules of Procedure.</p> <p>In the event that consensus cannot be reached on the selection of all or some of the host countries/cities to host a regional presence, the Secretariat is recommending using confidential balloting as a special procedure. This procedure is suggested as it exists in the “Procedures for adopting decisions in the event that all efforts at reaching consensus have been exhausted” (the Procedures)), albeit for the selection and appointment of Board-appointed officials (see Section VI of the Procedures), Therefore, the process is already developed as a reference point. Confidential balloting is also consistent with the approach undertaken by the Board at its 2nd meeting (B.02) when it selected the Headquarters location, after efforts at reaching consensus had been exhausted. This and the proposed steps to be taking during decision</p>

	<p>Annex I: it is entirely inappropriate in a proposed draft decision for the Board to suggest – as a foregone conclusion – that no consensus can be found on the selection of host countries. This is a determination to be made by the Co-chairs of the Board, not the Secretariat, and following extensive deliberations within the Board. In the same way, the confirmation that all efforts of reaching consensus have been exhausted comes from the Co-chairs as a result of engagement, not as a set draft decision sub-bullet proposed by the Secretariat.</p> <p>Thus, this draft decision should be rewritten entirely to showcase a decision on a scenario/configuration and host countries as the desired outcome. Only (a) and (f) are in keeping with an appropriate starting decision text.</p> <p>If any background information on voting approaches not in line with current practice - such as, mentioned above, the selection of the initial host country and Executive Director - is to be provided, it should be relegated to a public background document as an annex to the entire documentation accompanying the decision.</p>	<p>making has been included in the final Board document.</p>
<p>Annex IV – summary of operational risks</p>	<p>The risk to “staff health, safety, and security” (P1) being considered of medium impact, while “challenges in staff deployment” (P2) being considered of high impact in Table 1, is strange, suggesting a depersonalizing the staff to the extent that whether or not they can be deployed is of more consequence to the GCF and its operations than their literal health and safety. (In Table 2, the consequence of “could disrupt operations” is listed before “expose staff to harm”.) Such a mismatch would indeed seem to envision staff as facets within a larger machinery where the first question is whether they are present, in the right place, and the secondary one is whether they are able to be fully functioning and able to work. Staff health, safety, and security is paramount to staff being able to do their jobs, without even mentioning its significance as a matter of human decency and the moral codes that should underpin multilateral efforts, and we would question why its potential impact is considered middling in this</p>	<p>Thank you. The Secretariat recognizes the concern and agrees that staff health, safety and security is fundamental.</p> <p>The Secretariat clarifies that the P1 versus P2 ratings are not intended to imply that deployment challenges are more important than staff safety. P1 has high inherent severity; the residual rating reflects the expectation that duty of care and security controls reduce exposure during rollout. P2 remains higher residual risk because transition and deployment constraints can be harder to mitigate within fixed timelines and can affect continuity even where safety controls are in place.</p>

	<p>schema. (We do note the inherent severity is high, but the residual severity is medium.)</p> <p>Human rights risks to both GCF personnel and all stakeholders engaging with the Fund, particularly civil society, should be clearly evaluated and reflected in Table 2. Staff health, safety, and security is also particularly of concern, as observers have noted before, when we consider the uneven and in many cases rising global risks related to sex, gender identity and expression, and sexual orientation.</p> <p>Relatedly, in Table 2, the risk indicators for P1, “# significant security incidents” and “# near misses” do not seem to capture any ongoing data from staff regarding their feelings of safety and security, or the respect for their human rights. For example, are staff changing how, when, and where they shop, eat, or recreate due to feelings of unease in the location? Have there been changes in laws that make them feel inherently less safe, perhaps due to their identity? These indicators should reflect more than acute incidents, but a framework grounded in human rights, and ensure staff voice and concerns are integrated into ongoing risk management. We must reiterate that a framework of human rights for staff is not to be applied only in this case of regionalization, and none of this concern should imply or assume an inherently safer context within current headquarters. What we wish to ensure is that these particular risks to staff health, safety, and security, and the restriction of their human rights, are fully considered and given the merit they deserve during this process with increased attention to staff well-being, though such attention should be constant. Additionally, as previously stated, human rights risks also concern those interacting with the Fund through their regional offices and outposts. A lack of civil society engagement, due to restriction and repression or due to poor operationalization of the offices, will certainly have an impact that is substantial and should also be qualified within this matrix. One of the key features driving regional presence</p>	
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	<p>was the idea of improving stakeholder engagement, and those stakeholders must include civil society, with a right to freely and fairly associate.</p>	
<p>Annex IV – summary of operational risks</p>	<p>For the risk “Select countries only willing to provide limited privileges and immunities,” can you clarify if the information on each of the proposed countries and both their current privileges and immunities status and willingness to provide privileges and immunities is available in the limited distribution portion of the document? This information feels important to inform decision-making at this stage, and it seems like a typology of potential exemptions - and their acceptability or not - should be available given the GCF’s history of negotiating privileges and immunities with over 30 countries.</p>	<p>Thank you for your comments on this important matter. The need to afford GCF robust privileges and immunities has been set as an eligibility criterion, as adopted by the Board in decision B.42/14. These critical elements were assessed by the Secretariat and information has been included in the limited distribution document to support the Board in its decision-making role.</p> <p>These elements will also be taking into consideration during the negotiation of host country agreement.</p>
