



**GREEN
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18 March 2025

Co-Chairs' Roadmap for the updated Strategic Plan for the GCF 2028–2031– Addendum I: Response matrix for comments received on the draft document

Summary

The document contains responses to the comments of the Board on the draft document titled “Co-Chairs’ Roadmap for the updated Strategic Plan for the GCF 2028 – 2031”.

I. Response matrix for Board comments received on the draft document “Co-Chairs’ Roadmap for the updated Strategic Plan 2028 – 2031”.

Comments were received, in chronological order, from:

- United Kingdom
- Seat representing Finland, Hungary, Liechtenstein, Monaco and Switzerland
- Germany

Issue Category	Comment	BMs/Seats	Secretariat Response
General feedback	<p>Overall, we think this is a good paper and draft decision text, that will help us to move forward well towards USP3, and replenishment. It focuses helpfully on the decisions made previously in regards to the timings of various decisions to inform USP3.</p> <p>We note that USP3 is proposed to be agreed formally in the March (or latest July) 2027 Board. Ideally of course, this would be the March Board, to inform spending decisions (and the development of national Business Cases) - so we should seek to deliver that as best possible. The planned pathway to this formal decision, also looks realistic. However it will be good to understand a little more what the scope of the proposed B45 Item below is (just for our own clarity): ' Formal Board discussion on the arrangements for the third formal replenishment of the GCF. a. Objective: A decision on the arrangements for the third formal replenishment of the GCF'.</p>	United Kingdom	<p>Thank you. The Secretariat acknowledges the feedback on the importance of the relationship between strategic planning and replenishment</p> <p>The Arrangements for GCF-3 paper will be developed and presented to the Board, drawing on the arrangements adopted for GCF-1 and GCF-2. The paper will outline the replenishment process, including governance arrangements (roles of the Board, the Secretariat, and other stakeholders), procedural elements (structure, format, timing, and participants), and key inputs to inform the process. For reference, the arrangements adopted for GCF-2 can be found here. https://www.greenclimate.fund/document/gcf-b33-15-rev01</p>
General feedback	<p>On the Draft Decision, this reflects the paper itself so no further comments with one exception - we ask if those consulted (proposed as per para below) should expand to include beneficiaries - as though NDAs, IP Advisory Group and AEs can speak in part to these, they are not the direct beneficiaries of the Fund's work in many cases. This is hard to do comprehensively of course, but we could consider a sample group:</p> <p>(b) “Decides to conduct an open, inclusive, transparent</p>	United Kingdom	<p>Thank you. As part of the consultation process, the Secretariat intends to engage with NDAs and Accredited Entities throughout the development of the USP-3, especially on programming needs and opportunities (as referenced in para C of the draft decision).</p>

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	<p>consultation process engaging Board members and alternate Board members, national designated authorities, accredited entities, active observers, observer organizations and parties to the United Nations Framework Convention on Climate Change and the Paris Agreement, members of GCF panels and groups including the Indigenous Peoples Advisory Group, and other stakeholders to inform the review and update of the Strategic Plan.”</p>		
General feedback	<p>We thank the Co-chairs for presenting a proposal for a roadmap for the GCF updated Strategic Plan for 2028-2031 (USP3). This updated process will require a considerable amount of board attention during 2026 and early 2027, the USP being the main strategic and operational document of the GCF. It will also inform current and potential new funders of GCF-3 during the replenishment process in 2027. Therefore, a robust plan for the process is needed.</p>	<p>Finland, Hungary, Liechtenstein, Monaco and Switzerland</p>	<p>Thank you. Indeed, the Secretariat recognizes the need for a robust plan and will be proactively engaging our stakeholders. This includes contributor meetings through the GCF-3 replenishment process (consistent with previous strategy and replenishment cycles). Board consideration of the Arrangements for GCF-3 paper is planned for B.45.</p>
General feedback	<p>Our seat has the following comments on the roadmap:</p> <ol style="list-style-type: none"> 1. We welcome the open, inclusive, and transparent consultation process laid out, and the possibility for all stakeholders to provide input. It is important that the Board has the possibility to send written submissions on the various USP-3 drafts and therefore publish them well ahead of the Board meetings. 	<p>Finland, Hungary, Liechtenstein, Monaco and Switzerland</p>	<p>Thank you. The feedback on the importance of Board written consultations is well noted, and the Secretariat will plan accordingly.</p>
General feedback	<ol style="list-style-type: none"> 2. The Third Performance Review is an essential part of the USP-3 development process. However, it will be submitted to the board during the first Board meeting of 	<p>Finland, Hungary, Liechtenstein, Monaco and</p>	<p>Thank you for this feedback. The Board Workplan currently reflects the synthesis report being shared with the Board in advance of at B.45, and a summary report in advance of B.46.</p>

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	<p>2027, which is B.47 in March 2027. This seems too late if USP-3 is to be adopted in that meeting. The findings of the TPR should feed into the USP-3 process. The initial results (Synthesis report expected early 2026, foresight study early 2026, and Draft Factual Report Q4-2026) should be made available to Board members as soon as published and be the subject of regular communications from the Secretariat and the IEU to inform the draft zero of the USP-3.</p>	<p>Switzerland</p>	<p>The Secretariat will actively engage with the IEU relating to findings of the Third Performance Review and, under the guidance of the Co-Chairs and Board, the implications for USP-3.</p>
<p>General feedback</p>	<p>3. The roadmap aims at adopting USP-3 at B.47 in March 2027, or at B.48 in June 2027. We consider it important to target B.47 for the adoption of the USP-3 so that it can inform and benefit the replenishment process. For potential funders to seriously consider contributing to GCF-3, the strategic and operational priorities need to be ready well in advance of the pledging session.</p>	<p>Finland, Hungary, Liechtenstein, Monaco and Switzerland</p>	<p>Thank you. The Secretariat acknowledges the feedback on the importance of the relationship between strategic planning and replenishment.</p>
<p>General feedback</p>	<p>1. Germany welcomes the proposed roadmap for the preparation of the Updated Strategic Plan for 2028–2031 and appreciates the efforts of the Co-Chairs to structure an open and inclusive consultation process. A timely and well-structured strategic planning process will be important to ensure that the GCF remains responsive to evolving climate finance needs.</p>	<p>Germany</p>	<p>Thank you. The Secretariat stands ready to support the Co-Chairs in the USP-3 preparation process and will be proactively engaging our stakeholders.</p>
<p>General feedback</p>	<p>2. At the same time, we would encourage ensuring that the USP-3 process explicitly reflects on how the GCF can scale up its impact and programming in the next cycle. In particular, the USP-3 should help identify strategic priorities and institutional improvements that can support an ambitious third replenishment and enable the GCF to significantly increase its financing volumes</p>	<p>Germany</p>	<p>Thank you. The Secretariat welcomes Board guidance on GCF ambition and strategic priorities throughout the development of USP-3; and will provide the analysis and consultation inputs required to inform this.</p>

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	over time.		
General feedback	3. Germany would also welcome a stronger reflection in the roadmap of the Fund's catalytic role in mobilising private sector investment. The USP-3 process could therefore explore options to strengthen private sector mobilisation, including through the strategic use of financial instruments, blended finance approaches and enhanced engagement with domestic financial institutions and development banks.	Germany	Thank you. The suggestion to incorporate a stronger reflection in the roadmap regarding the Fund's catalytic role in private sector mobilization is well noted.
General feedback	4. Finally, we encourage the USP-3 process to consider opportunities to further improve the operational efficiency of the GCF. Continued efforts to streamline approval processes, reduce administrative burden for partners and clarify the division of responsibilities between the Board and the Secretariat could help ensure that the GCF delivers results at the scale and speed required.	Germany	<p>Thank you. During USP-3 development, the Secretariat will present for Board consideration operational, policy and process improvements required to deliver on Board ambition and strategic priorities, in addition to the streamlining of operational processes – a continuation of Efficient GCF.</p> <p>In relation to increasing the efficiency and effectiveness of Board governance, in line with decision B.42/02, the Board had requested the Co-Chairs, with the support of the Secretariat, to continue to consult with the Board on this matter and present proposal(s) to increase the efficiency and effectiveness of Board governance. The Co-Chairs noted the request from the Board, and is considering exploring both formal and informal means, such as Board retreats.</p>
General feedback	Regarding a potential meeting in Bonn, we were initially thinking of a board retreat still this year. But we maintain the offer in general.	Germany	<p>Thank you. The proposed Board retreat immediately before B.45 in Tajikistan and informal engagement at B.46 in South Korea leverage existing convening opportunities.</p> <p>The Secretariat appreciates the offer of Germany to host a retreat to further USP-3 discussions and awaits the Board decision on the Roadmap, including the proposed retreat in January 2027.</p>

II. Response matrix for Active Observers' comments

This section provides the response matrix that addresses the comments from Active Observers.

Questions/Comments	Secretariat Response
<p>We find some of the assumptions in this document about the current context and direction of climate finance and the necessary trajectory for the GCF concerning and request that it remains strictly procedural in nature, without pre-judging the shape of USP-3.</p> <p>In paragraph 1, defining three expectations for climate finance as “demonstrable results, country ownership, and greater catalytic impact” is a departure from definitions adopted by the UNFCCC and the purpose of the GCF set out in its Governing Instrument. Climate finance is defined by needs as much as by “demonstrable results” (terminology that begs the question of results for who and of what). The GCF’s country-driven approach is explicitly defined as people-centered and including vulnerable groups, and its impacts are expected to support a paradigm shift in the context of sustainable development, a carefully crafted formulation that cannot be reduced to “catalytic impact.” A procedural paper should reflect these positions rather than introducing controversial new terminology.</p> <p>In the same paragraph, climate finance expectations are set out with reference to Baku to Belém Roadmap (footnote 6) before there is even any mention of the New Collective Quantified Goal. This appears to deprioritize the Conference of the Parties and the Party-driven process that constructed the NCQG, while the B2B Roadmap is a consultative document without standing in the UNFCCC. The GCF’s responsiveness must be first and foremost to the Parties of the UNFCCC and the Paris Agreement, and given that the NCQG has specific direction for multilateral climate funds, alongside the guidance from the COP and CMA, that should be the starting point.</p> <p>As such, we would like to see the following sentence (including the B2B Roadmap reference) deleted: “At the same time, expectations for climate finance are rising - towards demonstrable results, country ownership, and</p>	<p>Thank you. Under the guidance of the Co-Chairs and the Board, the Parties to the United Nations Framework Convention on Climate Change (UNFCCC) and the Paris Agreement will be consulted in the development of USP-3.</p> <p>GCF, including the development of USP-3, is guided by the principles and provisions of the UNFCCC, the goals of the Paris Agreement and the objectives and guiding principles set out in GCF’s Governing Instrument, with acknowledgement of the landscape in which the Fund is operating.</p>

Questions/Comments	Secretariat Response
<p>greater catalytic impact - amid ongoing discussions on the reforms in the broader international financial architecture and increasing demands for complementarity and coherence, and measurable value-for-money across institutions.”</p> <p>The sentence could be left out entirely or replaced with language and references that reflect the procedural nature of the document, for example: “At the same time, expectations for climate finance are rising, as set out in the New Collective Quantified Goal on Climate Finance.” (https://unfccc.int/NCQG)</p>	
<p>In Paragraph 2, we also see two opportunities where the UNFCCC should be referenced - the “evolving needs of developing countries” must be understood within the context of the UNFCCC, a multilateral space where developing countries can and have voiced and quantified their needs, not least by the first and second Needs Determination Reports of the SCF, BTRs, BURs, NDCs, NAPs, and negotiated text. These needs are not to be characterized by fora where developing countries have less voice, such as repeating ideas from MDBs. Secondly, the idea of “accountability” in the final sentence should include accountability to the UNFCCC.</p> <p>We are also concerned about the language on a “reform agenda” in paragraph 7 (noting also this paragraph’s odd inclusion under Strategic Matters and not the introductory material where its content seems to align). USP-2 did not adopt a “reform agenda” so it makes no sense to imply that USP-3 will continue driving one. Once again, we would like to see procedural language rather than politically charged phrasing in this document, and suggest replacing “The USP-3 process will therefore continue driving the process for the reform agenda - identifying which operational, policy and process improvements are most critical to delivering the Fund’s objectives” with “The USP-3 process will identify which operational, policy and process improvements are most critical to delivering the Fund’s objectives.”</p> <p>We further note in paragraph 7 that <i>all</i> policy processes and policy updates are relevant to the USP-3, though of course some are more closely related</p>	<p>Thank you. The Board will determine the ambition and strategic choices to be reflected in USP-3, guided by the principles and provisions of the UNFCCC, the goals of the Paris Agreement and the objectives and guiding principles set out in GCF’s Governing Instrument.</p> <p>It is intended that USP-3 will include the operational, policy and process improvements which are most critical to delivering the Fund’s objectives, as decided by the Board.</p> <p>The specific reference to the Readiness and Preparatory Support Programme in the Roadmap reflects a recognition that the RPSP strategy will also be updated for the 2028-2031 period. The direction and guidance provided by the Board in relation to USP-3 will also be relevant to the preparation of the RPSP strategy for the same period.</p>

Questions/Comments	Secretariat Response
<p>than others: choosing only Readiness to highlight is again demonstrative of a specific set of preferences. The private sector is mentioned but not stakeholder engagement, the relationship between Readiness and the Locally-led Climate Action Framework and Guidelines could have just as easily been mentioned. At this point, refraining from specific policy references is the best procedural choice.</p> <p>In short, we would urge far greater caution to ensure that the Roadmap document is procedural in scope and does not already skew expectations for what the USP-3 will deliver in substance.</p>	
<p>Additionally, we would like to see more explicit language included on the ways in which Active Observer and observer participation can be ensured.</p> <p>6.1 At the 44th meeting of the Board, the informal focus group discussions should include Active Observers, who sign the ethics and conflict of interest forms. Additionally, there should be separate focus group discussions held with observers who are attending.</p> <p>6.4 The first Board workshop on the sidelines of B.45 should include Active Observers or their designated representatives, in keeping with the practice surrounding informal Board meetings as well as specific previous practice with regard to strategic planning workshops for the development of the original strategic plan and the update to the strategic plan.</p> <p>Active observers were invited as full participants in the informal Board meetings in discussions on the development of the initial strategic plan (which was held in Cape Town, South Africa, January 2016 in Indaba style) as well as in the informal Board meeting for the updated Strategic Plan in Monrovia, Liberia in February 2020. The active observers were also part of a multi-day Board workshop/informal Board meeting in Berlin for the update for USP-2, including as full-fledged participants in discussions and break-out sessions as well as all other related USP-2 related meetings on the side lines of the Board meetings. There is thus a clear precedent and established practice that should be followed for the USP-3 process, without deviation. The travel and participation for the CSO Active Observer from developing countries should be funded by the GCF.</p>	<p>Thank you. The Active Observer community will be engaged throughout the USP-3 development process, including in Board workshops. The first draft of the USP-3 will be published publicly.</p>

Questions/Comments	Secretariat Response
<p>6.5 Please provide clarity on whether draft zero of the USP will be a public document for B.46 - which is the observer preference. Even documents that are only discussed in informal Board meetings have been made public previously - doing so ensures those in the informal Board meeting are able to best understand and represent constituent views.</p> <p>6.6 As above in 6.4, note the second Board workshop should include Active Observers or their designated representatives.</p> <p>6.6. The in-session presentation (the slide deck) and first draft of the USP should both be public documents, as otherwise, the USP risks being adopted at B.47 without its previous iterations known. The zero draft, the informal Board workshop draft, and the pre-B.47 draft for potential adoption must all be public documents.</p> <p>Please see the notes on paragraph 7 grouped with similar comments in the first section, above.</p>	
