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GCF/B.44/05

4 March 2026

Independent Evaluation of the GCF's Simplified Approval Process

Summary

This report presents the findings and recommendations of an independent evaluation of the GCF's Simplified Approval Process undertaken by the Independent Evaluation Unit (IEU). The IEU conducted this evaluation as part of its 2025 Work Plan, which was approved by the Board at its fortieth meeting (B.40) in October 2024 (decision B.40/14).

I. Introduction

1. At its fortieth meeting in October 2024, the Board of the Green Climate Fund (GCF) approved the 'Independent Evaluation Unit 2025 Work Plan and Budget and Update of its three-year rolling objectives' (decision B.40/14). A key element of this plan was for the IEU to undertake an independent evaluation of the GCF's Simplified Approval Process.

2. The final report of the "Independent Evaluation of the GCF's Simplified Approval Process" was on the agenda for the forty-third meeting of the GCF Board (B.43) in October 2025, but the item was not opened.

3. This document presents the final report of the "Independent Evaluation of the GCF's Simplified Approval Process" in annex II. A draft decision for the Board's consideration is attached in annex I.

Annex I: Draft decision of the Board

The Board, having considered document GCF/B.44/05 titled "Independent Evaluation of the GCF's Simplified Approval Process":

(a) *Takes note* of the findings and recommendations in the Independent Evaluation of the GCF's Simplified Approval Process undertaken by the Independent Evaluation Unit;

(b) *Notes* the Secretariat's management response to the evaluation report as presented in document GCF/B.44/05/Add.01; and

(c) *Requests* the Independent Evaluation Unit to submit a management action report to the Board no later than one year following the adoption of this decision.

Annex II: Independent Evaluation of the GCF's Simplified Approval Process

The final report of the Independent Evaluation of the GCF's Simplified Approval Process is contained below.

GREEN CLIMATE FUND | Independent Evaluation Unit

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Simplified Approval Process

Final Report of the Independent Evaluation of the GCF's Simplified Approval Process

September 2025

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GREEN CLIMATE FUND
INDEPENDENT EVALUATION UNIT

INDEPENDENT EVALUATION OF THE GREEN CLIMATE FUND'S SIMPLIFIED APPROVAL PROCESS

FINAL REPORT

09/2025

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First Edition

This evaluation is a product of the Independent Evaluation Unit at the Green Climate Fund (GCF/IEU). It is part of a larger IEU effort to provide open access to its research and work and to make a contribution to climate change discussions around the world.

While the IEU has undertaken every effort to ensure the data in this report is accurate, it is the reader's responsibility to determine if any and all information provided by the IEU is correct and verified. Neither the author(s) of this document nor anyone connected with the IEU or the GCF can be held responsible for how the information herein is used.

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FOREWORD

"Small island States do not lack ambition, they lack finance."
United Nations Secretary-General António Guterres, 22 September 2023.

As the climate crisis intensifies, many countries face escalating urgency in delivering robust, accessible, and equitable climate finance. Against this backdrop, the Green Climate Fund (GCF) developed the Simplified Approval Process (SAP) to streamline access and reduce procedural burdens, a critical leap towards greater responsiveness and inclusivity.

This independent evaluation of the SAP takes place at a pivotal moment. Commissioned by the GCF Board and conducted under the mandate of the Independent Evaluation Unit, it examines the SAP against five key evaluation criteria: coherence, relevance, effectiveness, efficiency, and impact. The evaluation assesses how the SAP operates within the GCF's architecture, whether it is fit-for-purpose, how well it delivers on its objectives, and the extent to which it contributes to broader climate outcomes of the world's largest dedicated climate fund.

I extend my gratitude to the evaluation team for their dedication, and to all partners and stakeholders, including Board members, Secretariat staff, members of accredited entities and national designated authorities, as well as civil society representatives, for their invaluable engagement and insights throughout this process.

There is considerable promise in the idea of simplified access. This evaluation shows that the current SAP design has not delivered on its founding objectives, but the underlying goal of ensuring tailored, fast, and impactful support, especially for underserved communities, remains essential. With the lessons set out in this report, the GCF has an opportunity to reshape its approach, moving beyond the limitations of the existing SAP towards a new modality that can truly realize the potential of simplified access.

I am confident that the findings and recommendations contained in this evaluation will help strengthen the GCF's role as a forward-looking, equitable climate institution.

Marco d'Errico
Independent Evaluation Unit
Green Climate Fund
September 2025

ACKNOWLEDGEMENTS

The Independent Evaluation Unit extends its appreciation to the many individuals and institutions that contributed to this evaluation.

Deep appreciation is due Dr Martin Prowse, the Unit's Evaluation Specialist, who originally framed the evaluation, led the data-collection exercise and was instrumental in getting the evaluation appropriately oriented. We are grateful to Daisuke Horikoshi, who served as a peer reviewer and provided critical insights that strengthened this evaluation. Daisuke Horikoshi was the evaluation task lead for the first independent evaluation of the SAP modality completed in 2020, and as such an invaluable internal discussant and knowledge broker. The evaluation team is also grateful to Andreas Reumann, Head of the IEU, for his support and guidance for this evaluation.

From the GCF Secretariat, we are particularly indebted to Freddy Soto, Project Specialist in the Simplified Approval Process and Project Preparation Facility teams, whose consistent accessibility and engagement greatly supported our work, and to Henry Gonzalez, Deputy Executive Director and Chief Investment Officer, for his openness and guidance. We also acknowledge the role of Melvin Moore, whose contributions during his internship with the IEU provided valuable support to the evaluation process. Our appreciation also goes to Rishabh Moudgill and Youn Soo Park from the policy team of the IEU and Yeonji Kim, Josephine Wambui Ngala, and Giang Pham from the learning and uptake team of the Unit for taking the time to do several rounds of reviews, and contributing to enhancing the quality of the evaluation report on various aspects.

Beyond these individuals, we extend our sincere thanks to colleagues across the GCF Secretariat, including the Divisions of Mitigation and Adaptation, Country Programming, Portfolio Management, Strategy, Policy and Innovation, Private Sector Facility, and other units, for sharing their perspectives and insights. We also appreciate the contributions of members of the Independent Technical Advisory Panel and Accreditation Panel.

The evaluation benefited from the engagement of representatives of Direct Access Entities, including the *Banque Ouest Africaine de Développement* and the *Fondo Mexicano para la Conservación de la Naturaleza*, as well as multilateral partners such as the *United Nations Development Programme* , *World Food Programme*, and *Save the Children*. We also thank private-sector partners, including *Mirova* and the *Prospereté Growth Fund*, for their availability and insights.

We are grateful to our peers in other climate funds and comparator institutions, including the *Adaptation Fund*, *Global Environment Facility*, *Climate Investment Funds*, *Global Fund to Fight AIDS, Tuberculosis and Malaria*, and *Gavi, the Vaccine Alliance*, who shared experiences and lessons that enriched this evaluation. We also acknowledge the perspectives shared by civil society organizations and observers, including the *Women's Environment & Development Organization.*

Finally, we thank the members of the GCF Board, national designated authorities, accredited entities, contributors, and other stakeholders in the climate finance community who participated in interviews, surveys, and consultations. Their openness and engagement made this evaluation possible.

The findings, conclusions, and recommendations presented in this report are the sole responsibility of the IEU and do not necessarily reflect the views of those acknowledged.

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GUIDE FOR BUSY READERS

The IEU recognizes that the report of Independent Evaluation of the GCF's Simplified Approval Process (SAP2025) may be distributed to a wide range of stakeholders with varying objectives and timeframes for reading them. The IEU makes the following suggestions on how busy readers might approach reading this final evaluation report. Below, key thematic questions are provided with reference to the chapters and sections where they are explored.

1. **Countries Particularly Vulnerable to Climate Change and Direct Access**

If you want to learn about how the GCF engages with vulnerable countries, including African States, and/or want to understand why the SAP is used by international accredited entities, rather than by direct access entities only, read the following chapters:

- Chapter 3 SAP in a One-Size-Fits-All Approach: who is the SAP really serving?
- Chapter 4 Performance and Delivery of the SAP, and
- Chapter 6 Paradigm Shift.

2. **Private Sector Engagement and Catalytic Finance**

If you are interested in private sector engagement, and how the SAP relates to triggering private sector engagement and catalysing climate finance, read the following:

- Chapter 3 SAP in a One-Size-Fits-All Approach: capacity strengthening contribution, and
- Chapter 6 Paradigm Shift.

3. **Innovation, Replication and Scaling**

If you are interested in how the SAP catalyses climate finance in country owned processes, how it has evolved in terms of risk, replication and scale, or what the trade-offs are between innovation and scale, read the following:

- Chapter 6 Paradigm Shift, in particular the sections on impact, adaptation, and sustainability and replication as success drivers
- Chapter 2: SAP in the Context of GCF Reform: SAP's external positioning and overlap with other funds, and
- Chapter 5 Delegated Authority for Simplified Access.

4. **Processes: Acceleration, Speed and Types of Innovation**

If you are interested in what "acceleration" means in the context of the SAP, and how it is different from "speed", or what "climate rationale" means in SAP context, read the following:

- Chapter 4 Performance and Delivery of the SAP: evolution of approval timeframes and critical resource gaps,
- Chapter 2 SAP in the Context of GCF Reform: strategic implications for reform and SAP's external positioning and overlap with other funds, and
- Chapter 3 SAP in a One-Size-Fits-All Approach: design framework constraints.

Tip for readers: For a high-level overview of conclusions and recommendations, start with the Executive Summary of this report. For technical details, including methods, benchmarking tables, and case studies, see Volume II of the evaluation report.

ABBREVIATIONS

AE	Accredited Entity
AF	Adaptation Fund
AI	Artificial Intelligence
ANCOVA	Analysis of Covariance
ANOVA	Analysis of Variance
BOAD	Banque Ouest Africaine de Développement (West African Development Bank)
CAWA	Climate Change Adaptation in Wetlands Areas
CEGIS	Center for Environmental and Geographic Information Services
CEO	Chief Executive Officer
CIC2	Climate Investment Committee (CIC) – Stage 2 (CIC2)
CIF	Climate Investment Fund
CN	Concept Note
COE	Challenging Operating Environments (policy of the GFATM)
COP	Conference of the Parties to the United Nations Framework Convention on Climate Change (UNFCCC)
CREWS	Climate Risk and Early Warning Systems
CSE	Centre de Suivi Écologique
DAE	Direct Access Entity
DGM	Dedicated Grant Mechanism for Indigenous Peoples and Local Communities
ECCCP	Extended Community Climate Change Project SAP 008
EIF	Environment Investment Fund of Namibia
ESS	Environmental and Social Safeguards
FAA	Funded Activity Agreement
FAO	Food and Agriculture Organization
FCAS	Fragility, Emergencies and Displaced Populations policy in Gavi
FEDP	Emergencies and Displaced Populations
FIP	Forest Investment Program
FMCN	Fondo Mexicano para la Conservación de la Naturaleza, A.C. (Mexican Fund for the Conservation of Nature)
FP	Funding Proposal
GCF	Green Climate Fund
GEF	Global Environment Facility
GF	Global Fund (for AIDS, Tuberculosis and Malaria)
GFATM	Global Fund for AIDS, Tuberculosis and Malaria
HW	Health and Well-being, Food & Water Security result area
IAE	International Accredited Entity

IEU	Independent Evaluation Unit (of the GCF)
IRM	Initial Resource Mobilization
IRMF	Integrated Results Management Framework
KII	Key Informant Interview
LDC	Least Developed Country
LDCF	Least Developed Countries Fund
LORTA	Learning-Oriented Real-Time Impact Assessment
MAR	Management Action Report
MILPA	traditional Mesoamerican polyculture farming system
NIE	National Implementing Entities, an Adaptation Fund structure
NSC	National Steering Committee, a Climate Investment Fund structure
OPS7	Seventh Overall Performance Study of the GEF
PAP	Project Approval Process
PAPIL	la petite irrigation locale
PDR	(Lao) People's Democratic Republic
PIF	Project Identification Form (in the GEF)
PFG	Project Formulation Grant
PKSF	Palli Karma-Sahayak Foundation
PPF	Project Preparation Facility
PROFONANPE	Fondo de Promoción de las Áreas Naturales Protegidas del Perú (Trust Fund for National Parks and Protected Areas of Peru) FP001
PROMIRE	Promoting zero-deforestation cocoa production for reducing emissions in Côte d'Ivoire project (SAP015)
PSAA	Project-Specific Assessment Approach
PSF	Private Sector Financing
REDD	Reducing Emissions from Deforestation and Forest Degradation
RFP	Request for Proposal
RIOS	River Restoration for Climate Change Adaptation
RPSP	Readiness and Preparatory Support Programme
SAP	Simplified Approval Process
SCCF	Special Climate Change Fund
SIDS	Small Island Developing States
TERG	Technical Evaluation Reference Group
UNDP	United Nations Development Programme
UNEG	United Nations Evaluation Group
UNEP	United Nations Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change
USD	United States Dollar

VC	Increase in investments targeting the livelihoods of people and communities' results area
WFP	World Food Programme
WMO	World Meteorological Organization

EXECUTIVE SUMMARY

INTRODUCTION

The Green Climate Fund's Simplified Approval Process (SAP) was conceived as a transformative mechanism to address a fundamental challenge in climate finance. It aimed to provide faster, more accessible funding pathways for smaller-scale, lower-risk climate interventions, and take into account the needs of countries that are particularly vulnerable to climate change effects, including the least developed countries (LDCs), small island developing States (SIDS) and African States.

The IEU first evaluated the modality in 2020 and concluded that while initial achievements were observable, ultimately the SAP had not simplified requirements or accelerated processes. The SAP's value added was limited in achieving its three expected outcomes: meeting urgent climate adaptation needs, enhancing direct access, and supporting scaling up.

A 2021 management action report (MAR) on the evaluation found that the Secretariat had reinforced the integration of capacity strengthening elements, accelerated post-SAP-approval procedures, and introduced simplified documentation through an SAP Appraisal Toolkit. However, this evaluation report (2025) also found that the Secretariat had not further developed a much-needed fit-for-purpose review process with tailored investment criteria and a strategy to integrate the modality. Eight years after its launch through decision B.18/06, this evaluation re-examines whether the SAP has delivered on its founding promise and what lessons emerge in the context of institutional change and the broader climate finance architecture.

The evaluation's timing is particularly significant given the urgency in climate finance context highlighted in recent international assessments. Greenhouse gas concentrations reached record levels in 2023 and continue to rise. At the same time, the adaptation finance gap has widened to an estimated USD 187-387 billion annually in developing countries, while several major donors have signalled substantial aid reductions[1]. The need for efficient and accessible climate finance mechanisms has never been more urgent.

The evaluation applied a mixed-methods design aligned with the GCF evaluation criteria, in particular relevance, effectiveness, efficiency, coherence, and impact. It triangulated quantitative portfolio analysis with benchmarking, key-informant interviews, an AE survey and a set of comparative case studies. The portfolio analysis covered all 49 SAP approvals through B.41 (totaling USD 659 million) and size-matched project comparators of the standard Project Approval Process (PAP). The benchmarking examined simplified mechanisms across the Global Environment Facility (GEF), Adaptation Fund (AF), Climate Investment Funds (CIFs), the Global Fund, and Gavi. More than 70 interviews and a survey of accredited entities (30 responses) complemented the document review. Furthermore, 13 case studies (seven SAP, six PAP) explored design, risk, timelines, and results at project level.

Evidence coverage faced three constraints. First, many SAP projects had limited time in implementation within the evaluation framework. Case studies were purposefully selected among the SAP projects with at least three Annual Performance Reports in order to assess project results. Second, the policy framework evolved during the period complicating like-for-like comparisons across time. The evaluation team mitigated this by basing comparisons on the policy rules that applied at each decision point (e.g., pre- vs. post-B.32). Third, GCF institutional turnover also reduced access to a historical perspective as several Secretariat staff with direct experience had

[1] United Nations Environment Programme (2023). *Adaptation Gap Report 2024: Come hell or high water*. Nairobi. Available at: https://doi.org/10.59117/20.500.11822/46497

moved on. The evaluation team nevertheless identified and interviewed both current and former GCF staff and supplemented their accounts with documents and portfolio data.

CONCLUSIONS

CONCEPTUAL TENSIONS IN SIMPLIFIED ACCESS

The evaluation reveals a critical distinction that has shaped the SAP's trajectory. The distinction between "simplified access" and "simple access" explains why the modality has struggled to fulfil its foundational promise, despite successive reforms. The SAP has, in practice, pursued simplified access, making incremental improvements to existing procedures through streamlined templates, reduced documentation requirements, and procedural adjustments while maintaining the same underlying approval architecture. This approach remains anchored to established governance structures and review standards while attempting to reduce transaction costs through process optimization.

By contrast, simple access, as implied by the Governing Instrument and early constituency advocacy, goes beyond process optimization to remove structural barriers. It requires fundamental changes to governance structures, risk management frameworks, and incentives to create clear pathways for vulnerable countries and communities.

This distinction helps explain why the **SAP and the PAP have become almost indistinguishable, despite the intention to simplify.** Operating within the same governance framework designed for larger, more complex interventions creates contradictions that procedural reforms alone cannot resolve. The requirement for full Board approvals, the application of identical investment criteria, and the maintenance of comprehensive review standards each reflect entrenched institutional imperatives that override simplification objectives when they conflict with fiduciary responsibilities.

This tension is evident in the one-size-fits-all implementation that characterizes current SAP operations. Although the modality aspires to tailor approaches to diverse entity capacities and country contexts, in practice, it applies largely uniform requirements that prioritize consistency over responsiveness. The SAP's restriction to Category C activities illustrates this trade-off: it simplifies review procedures but excludes many adaptation interventions that involve moderate risk.

OPERATIONAL INEFFICIENCIES AND LIMITATIONS

Multiple lines of evidence indicate that the SAP has become operationally inefficient. This conclusion is based on consistent empirical evidence showing that the SAP no longer delivers added value in speed or access.

The convergence between the SAP and regular approval processes has eliminated the efficiency rationale for maintaining separate procedures. Despite being categorized as lower-risk and having a smaller scale, the SAP is treated almost identically to PAP projects, with equal or longer processing times. With the Secretariat committed to reducing PAP timelines to nine months through the Executive Director's "Efficient GCF" initiative under the 50by30 vision, the SAP's current 12-month median offers no comparative advantage. Instead, it adds the burden of maintaining parallel approval pathways.

Resource delivery evidence compounds these concerns and has broader strategic implications for climate action. Low disbursement and expenditure rates reveal a fundamental breakdown in the mechanism's core function. These figures indicate that most of the Board-approved climate finance

remains stalled in institutional processes rather than reaching implementation, where it can generate a measurable impact. At the same time, low disbursement and expenditure rates highlight the need to examine AE implementation capacity more closely.

Transaction cost analysis further shows that many entities find that the SAP makes applying for funding harder than easier. Preparation costs of up to USD 750,000 and multiple review cycles undermine the supposed simplification. Reported costs exceed those of comparable funds by a factor of three to 10, while the volume of the comments in successive review cycles, sometimes including contradictory feedback, reflects unpredictable requirements and the continued need for specialized expertise.

The efficiency paradox extends beyond processing times to broader resource allocation. Running parallel SAP and PAP procedures consumes scarce GCF capacity without producing commensurate benefits. Maintaining two sets of staff, systems, and oversight mechanisms imposes opportunity costs that are especially significant given the urgent need for effective climate finance delivery and the GCF's limited resources.

COMPARATIVE APPROACHES WITH DIFFERENT STRUCTURAL FEATURES

Benchmarking against successful simplified access mechanisms in other institutions helps illustrate both the specific challenges facing the SAP and the broader principles that enable effective, streamlined climate finance delivery. Comparative analysis shows that successful mechanisms share structural features largely absent from the SAP, strongly suggesting the need for fundamental, not incremental reform.

Delegated authority emerges as a critical differentiator between successful simplified mechanisms and the SAP's current approach. Institutions like the GEF, AF, and Gavi demonstrate that delegated decision-making enables approvals within months, or even weeks, when governance aligns with operational needs. For example, the GEF's Medium-Sized Projects achieve approvals through CEO delegation within six to nine months, while the AF's EDA allows national institutions to approve subprojects within approved frameworks. Gavi's emergency policy permits CEO approval within weeks for urgent health interventions, showing that rapid response is feasible under supportive governance structures.

Integrated support is another success factor distinguishing effective mechanisms from the SAP's more fragmented approach. Preparation grants embedded within project cycles make support predictable, accessible, and faster to deploy. The AF allows (Project Formulation Grant) PFGs at the concept stage, while the GEF offers integrated Project Preparation Grants that can be requested simply by ticking a box on the Project Identification Form (in the GEF -PIF). These approaches avoid the separate application requirements that add months to SAP timelines, while providing more reliable preparation support.

Risk-appropriate procedures also trigger successful simplified mechanisms. Adapting review standards to actual risk profiles reduces transaction costs while maintaining quality assurance. The CIFs' Dedicated Grant Mechanism uses community-led governance for small grants, while the Global Fund's COE policy adapts procedures for fragile contexts. These approaches show that simplified procedures can still uphold accountability when institutional incentives support proportionality.

Clear targeting enables successful mechanisms to optimize procedures for specific constituencies rather than attempting to serve all developing countries with uniform processes. By focusing on clearly defined groups, mechanisms can balance accessibility with accountability more effectively.

For example, the GEF's Least Developed Countries Fund serves only the LDCs, while the CIF's Dedicated Grant Mechanism is tailored to Indigenous Peoples and local communities. This specificity allows procedural customization that broadly applicable mechanisms cannot achieve.

Institutional culture and incentive alignment play a decisive role in mechanism effectiveness. Where institutions prioritize speed and accessibility, simplification objectives are reinforced rather than undermined. Successful simplified approaches operate within organizations where these priorities are embedded. In contrast, at the GCF, comprehensive review and risk mitigation often take precedence over reducing transaction costs when the two objectives conflict.

THE INNOVATION-REPLICATION NEXUS

The evaluation reveals a fundamental contradiction between the SAP's innovation aspirations and its operational reality. Decision B.32/05 sets the expectation that SAP proposals should demonstrate "potential for transformation and promote a paradigm shift." Yet, evidence shows that the projects with the strongest impact have concentrated on replicating and adapting proven models, rather than proving novel designs.

For example, the R4 Rural Resilience Initiative, replicated across multiple African contexts, and the CREWS framework, now being scaled through SAP048 in Togo. Both of these SAP activities demonstrate stronger institutional uptake and clearer pathways to systemic impact than experimental interventions based on untested concepts.

This pattern reflects an inherent tension between expectations and structural constraints. Category C restrictions, smaller funding envelopes, and risk-averse review processes favour tested approaches over experimentation. The absence of a GCF-wide definition of innovation has created systemic confusion, inside and outside the organization, about what constitutes transformational impact, contributing to the credibility gap identified in stakeholder interviews.

The IEU's 2020 SIDS evaluation provides a more nuanced framework for assessing innovation. It distinguishes innovation across four dimensions: type, scale, context, and intensity. This approach indicates that most GCF projects represent contextual adaptations rather than global breakthroughs. In SIDS, only a few reported innovations were "new at the regional or global level."

This shows that GCF innovations are often valuable without being disruptive, and that assessing them against inappropriate benchmarks has created unrealistic paradigm shift expectations.

The SAP's comparative advantage may lie in scaling proven interventions in new contexts. It should encourage the replication and scale up of innovation and fit-for-purpose technology solutions to enhance climate resilience in vulnerable contexts. Replication with local adaptation offers a legitimate form of innovation that prioritizes access and inclusion over novelty. Case studies show that projects achieve meaningful impact by systematically replicating tested models across different territorial contexts, tailoring them to community needs, AE absorption capacity, governance structures, and environmental conditions.

This approach aligns with the SAP's foundational targeting of vulnerable countries and DAEs. Here, innovation lies in demonstrating that less-resourced entities can successfully implement effective climate interventions in challenging contexts. Reframing the SAP's role around contextual scaling rather than breakthrough innovation could resolve the current credibility gap and provide a more realistic, achievable mandate for simplified access mechanisms.

GOVERNANCE AND LIMITED DELEGATION

The governance structure surrounding approval authority represents an unresolved tension within the GCF's institutional framework. While comparator organizations and peer multilateral funds rely on delegated approval mechanisms, the GCF requires universal Board approval for all SAP proposals regardless of scale or risk. Stakeholder perspectives remain polarized: some AEs argue that expanded delegated authority would reduce bottlenecks and transaction costs, while others stress the importance of maintaining Board oversight and comprehensive due diligence.

The evaluation cannot definitively determine whether delegated authority would enhance or compromise outcomes. However, the persistence of these divergent perspectives underscores the need for deliberate and transparent policy dialogue on the conditions and safeguards under which delegated authority could genuinely support simplified access objectives. The SAP portfolio shows notably limited private sector participation. Structural misalignment between private sector requirements and the SAP design discourages engagement. Private projects are constrained by Category C restrictions, strict investment criteria, and modest financial ceiling that do not justify the costly structuring typically needed to attract private investors. As a result, private sector expenditure performance has lagged behind that of public sector projects.

While developing a comprehensive private sector strategy exceeds this evaluation's mandate, the evidence highlights the participation gap and the need to consider whether simplified approval modalities are appropriate vehicles for private climate investments. Findings suggest that private sector engagement may be better pursued through alternative GCF instruments tailored for risk-sharing and investment structuring.

The continued restriction of SAP eligibility to Category C projects fundamentally limits the modality's strategic relevance. By excluding small-scale infrastructure and resilient agriculture systems, the restriction narrows the portfolio to a subset of lower-risk interventions. Many of these excluded activities are standard in comparator funds. This limitation curtails the SAP's catalytic potential for transformational climate action. Addressing this constraint warrants consideration by the Board of replacing the exclusionary rule with proportional risk management frameworks, enabling the SAP, or any successor modality, to better support strategic objectives while upholding safeguards.

These outstanding issues are consistent with broader institutional design questions identified by earlier IEU evaluations. The persistent need for simplified access windows, especially for DAEs and projects in SIDS, LDCs, and African countries, reinforces the utility of targeted instruments. The 2021 IEU evaluation of the request for proposals (RFPs) modality emphasized the value of such instruments for filling portfolio gaps and stimulating proposals in priority thematic areas. Thematically focused RFPs, regionally tailored access mechanisms, or sector-specific simplified pathways are cited as plausible ways to address the access gaps and meet the needs of the constituencies the SAP was originally designed to serve.

INSTITUTIONAL VALUE BEYOND ORIGINAL INTENT

While the SAP has failed as a simplification mechanism, the evaluation identifies significant unintended impacts in its evolution towards institutional capacity development. This unplanned result has generated tangible benefits for DAEs, strengthening climate finance capabilities beyond individual project outcomes. The "stepping-stone effect" described by stakeholders represents genuine institutional value. Entities report that SAP experience builds confidence, develops

procedural familiarity and fosters relationships that ease access to larger climate finance opportunities.

This progression from smaller to larger initiatives has created a pipeline of capable implementers that strengthens the climate finance ecosystem. The psychological dimension of capacity-strengthening, confidence gained through successful implementation, is particularly important for entities with limited international experience. This learning-by-doing effect reduces the risk of implementation failures that could damage both institutional reputation and climate outcomes, and it cannot be replicated through training programmes or technical assistance alone.

The evolution of the SAP towards capacity-strengthening also raises questions about institutional design. If institutional development is the SAP's primary value, alternative mechanisms may deliver it more efficiently, while dedicated readiness or technical assistance programmes could address these needs at lower cost. Conversely, if simplification remains the priority, then project financing may not be the most appropriate channel for strengthening institutional capacity.

Statistical analysis demonstrates that SAP projects are associated with a 16.3 per cent increase in investments targeting the livelihoods of people and communities, significant at the 1 per cent level. This evidence suggests that the SAP effectively directs resources to vulnerable populations, in line with its foundational logic. Vulnerable country groupings, LDCs, SIDS, and African States, collectively receive more than half of SAP financing, exceeding initial expectations.

The analysis further shows that sustainable climate action in vulnerable contexts depends on moving beyond externally driven models. **Projects co-created with communities and grounded in traditional environmental knowledge systems achieve greater sustainability than those relying solely on modern interventions.** A strong focus on vulnerable people and communities requires both their buy-in and their active participation in project design.

RECOMMENDATIONS

The SAP modality has become operationally ineffective in its current form, failing to deliver on its core promises of simplification, acceleration, and enhanced access. The mission drift from a vulnerable community focus towards serving as a capacity-strengthening mechanism for entities represents a fundamental departure from the SAP's foundational objectives. While this evolution has generated value for participating institutions, it contradicts the original mandate to provide a simplified process and simple access for those most in need of streamlined procedures.

The SAP's core function of delivering climate finance remains unfulfilled. With low disbursement and expenditure, the modality has not succeeded in getting approved resources to flow to climate interventions on the ground. While capacity constraints among DAEs contribute to these outcomes, the persistence of governance bottlenecks and lack of SAP-specific support structures mean the mechanism has not been equipped to overcome such challenges.

Because incremental changes have failed to fix ongoing problems, these recommendations call for major institutional changes to create truly simple access pathways that better serve vulnerable countries, peoples and communities. These institutional changes will ensure the GCF better fulfils its mandate of promoting paradigm shifts towards low-emission and climate-resilient development pathways. The urgency of the climate challenge, combined with tightening global climate finance availability, demands that multilateral institutions like the GCF maximize their effectiveness in serving those most in need.

The evaluation team provides recommendations to both the GCF Board and the GCF Secretariat, as follows:

Recommendation to the Board

Recommendation 1: The GCF Board should consider discontinuing the SAP modality in its current form, as operational ineffectiveness remains and the delivery of climate finance has been limited.

The Secretariat could begin phasing out the SAP, with a view to its complete closure in its current form as soon as operationally feasible. As an access modality, the SAP has not met expectations to simplify or expedite climate finance delivery. Instead, it has become operationally ineffective and virtually indistinguishable from the regular PAP.

Recommendation 2: The GCF Board and Secretariat should expedite the design and launch of an alternative, integrated access modality tailored to vulnerable countries, people, and communities.

This new modality should replace SAP, build on lessons learned, and be designed around flexible, risk-appropriate processes and delegated authority to the Secretariat. A fit-for-purpose "simple access" window managed by the Secretariat would provide broader eligibility and streamlined governance. The concept of vulnerability, whether for countries or communities, should remain the central criterion, as originally intended, to proceed under more flexible rules. The Board should take into account the needs of countries that are particularly vulnerable to climate change effects, including LDCs, SIDS, African States. This change acknowledges that a fundamentally new approach is required.

The new modality could also adjust environmental and social risk thresholds. Restricting the SAP to minimal-risk Category C projects has narrowed its scope and accessibility. Many small-scale adaptation projects, such as climate-resilient agriculture with minor infrastructure or community-level coastal protection that often carry moderate risks, are excluded from the modality. The new modality could therefore allow medium-risk Category B projects with streamlined safeguards, while continuing to exclude higher risk interventions.

The Secretariat could consider introducing policy and governance reforms to streamline approval processes for the new modality. These should include delegating approval authority for small projects to the Executive Director and instituting review workflows on a rolling basis.

Recommendations to the Secretariat

Recommendation 2: The GCF Board and Secretariat should expedite the design and launch of an alternative, integrated access modality tailored to vulnerable countries, people, and communities.

This new modality should replace SAP, build on lessons learned, and be designed around flexible, risk-appropriate processes and delegated authority to the Secretariat. A fit-for-purpose "simple access" window managed by the Secretariat would provide broader eligibility and streamlined governance. The concept of vulnerability, whether for countries or communities, should remain the central criterion, as originally intended, to proceed under more flexible rules. The Board should take into account the needs of countries that are particularly vulnerable to climate change effects, including LDCs, SIDS, African States. This change acknowledges that a fundamentally new approach is required.

The new modality could also adjust environmental and social risk thresholds. Restricting the SAP to minimal-risk Category C projects has narrowed its scope and accessibility. Many small-scale adaptation projects, such as climate-resilient agriculture with minor infrastructure or community-

level coastal protection that often carry moderate risks, are excluded from the modality. The new modality could therefore allow medium-risk Category B projects with streamlined safeguards, while continuing to exclude higher risk interventions.

The Secretariat could consider introducing policy and governance reforms to streamline approval processes for the new modality. These should include delegating approval authority for small projects to the Executive Director and instituting review workflows on a rolling basis.

Recommendation 3: The Secretariat should center the alternative, integrated access modality on local approaches across the project cycle.

The new modality should ensure strong country context linkages through co-development processes. The Secretariat should consider encouraging funding proposals that adopt area-based and landscape approaches, addressing climate challenges at the community or ecosystem levels. By focusing on local context linkage and co-development with stakeholders on the ground, GCF can ensure projects are appropriate to the socio-cultural and environmental reality, thereby improving absorption capacity and effectiveness.

Recommendation 4: The Secretariat should ensure the new modality does not pilot new and untested project ideas. Instead, it should encourage the replication and scaling up of innovation and fit-for-purpose technology solutions in vulnerable contexts.

To achieve this, the Secretariat should:

4.1 Define appropriate innovation requirements for different types of projects and modalities. The Secretariat should establish a tailored approach to innovation and provide clear guidance distinguishing between innovation expectations for different project categories and modalities. In particular, projects of the new modality should be able to foster technology transfer, scaling-up initiatives, and evidence-based approaches that engage with local stakeholders (e.g. indigenous people, youth, female-led and community-based entities).

4.2 Develop a system to track and replicate successful project models. The Secretariat should ensure that the new modality identifies successful project models and replicates them. The Fund may wish to establish a mechanism to catalogue proven approaches from the GCF and other funds, and encourage their adoption.

Implementing these recommendations would enable the Fund to address a fundamental conceptual tension identified in the SAP: A simplified access modality cannot effectively serve as a “simplified access” tool and an “innovation/piloting” mechanism. The SAP struggled to fill both functions. The new modality should focus on replicating and scaling up proven interventions, while leaving piloting of new project ideas to dedicated innovation facilities better suited to higher-risk interventions. Experimental or pilot projects are supported through other channels, such as RFPs or the regular PAP, as appropriate.

Recommendation 5: The Secretariat should promote greater institutional integration to ensure that simplified access functions as part of an integrated pathway rather than a parallel silo.

The SAP experience shows that lessons are only valuable if translated into genuinely differentiated approaches rather than refined versions of current practices. To achieve this, the Secretariat could establish a cross-institutional task force to review and redesign coordination mechanisms across all GCF modalities and programmes, ensuring readiness support, project preparation facilities, and approval processes are integrated. Particular emphasis could be placed on linking RPSP and PPF support directly to the new modality.

MAIN REPORT

I. INTRODUCTION

A. MANDATE AND BACKGROUND

1. The Green Climate Fund (GCF) is an operating entity of the financial mechanism of the United Nations Framework Convention on Climate Change (UNFCCC). In the context of sustainable development, the GCF advances and promotes a paradigm shift towards low-emission and climate-resilient development pathways.
2. The GCF's Independent Evaluation Unit (IEU) is an accountability mechanism that reports directly to the Co-Chairs of the GCF. The IEU discharges both accountability and learning functions, with a focus on completing independent evaluations to inform Board decision-making by identifying and disseminating lessons learned.
3. As discussed in Chapter 3, the Governing Instrument envisaged simplified processes for certain proposals.[2]
4. Paragraph 31 of the Governing Instrument of the GCF states that the Fund will provide simplified and improved access to funding, including direct access, basing its activities on a country-driven approach. Adopted during the eighteenth meeting of the Board (B.18) in October 2017 and updated at B.32 in 2022, the Simplified Approval Process (SAP) operationalizes this mandate for small-scale proposals by streamlining the design, review, approval and disbursement processes.
5. Decision B.18/06 approved the SAP Pilot Scheme, as outlined in Annex X of the decision, for projects or programmes brought forward by accredited entities (AEs) that: (a) were ready for scaling up and had the potential for transformation, (b) requested a GCF contribution of up to USD 10 million, and (c) had environmental and social risks and impacts classified as minimal to none.[3] The pilot SAP modality aimed to ensure that DAEs accounted for at least 50 per cent of all approved projects supported by appropriate measures from the GCF Secretariat.
6. Decision B.18/06 specified that the SAP Pilot Scheme would be subject to a rapid review two years after its operationalization or once the aggregate funding amount of approvals under the Pilot Scheme reached USD 80 million in GCF financing. The review aimed to improve efficiency and effectiveness, and to consider expanding the types of eligible activities and increasing GCF funding.
7. At the twenty-fourth meeting of the Board (B.24), the Board requested an independent assessment of the SAP Pilot (SAP2020). SAP2020 critically appraised the Secretariat's self-review of the SAP Pilot Scheme,[4] which had been triggered on 14 November 2019 when the aggregate amount of GCF financing for approved SAP funding proposals surpassed USD 80 million. The IEU shared their critical appraisal of the Secretariat's self-review at the twenty-fifth meeting (B.25) and completed its independent assessment of the SAP Pilot Scheme, which it delivered to the Board on 21 June 2020 in time for the twenty-sixth meeting (B.26).
8. In decision B.30/02, the Board took note of the IEU's assessment of the SAP Pilot Scheme, alongside the Secretariat's management response.[5] The Board requested that the IEU submit a management action report (MAR) to the Board within one year.

[2] See paragraph 63 which cites Article 9.9 of the Paris Agreement
[3] Decision B.18/06, Annex X. "Simplified Approval Process Pilot Scheme"
[4] GCF/B.25/12. "Review of the Simplified Approval Process Pilot Scheme"
[5] GCF/B.30/07/Add.01. "Secretariat management response to the Independent Assessment of the Green Climate Fund's Simplified Approval Process (SAP) Pilot Scheme"

9. At the thirty-second meeting of the Board (B.32), through decision B.32/05, the Board updated the SAP, as set out in Annex IV. The decision raised the ceiling to USD 25 million, retained environmental and social safeguard (ESS) Category C, reiterated the 50 per cent DAE aim, and emphasized readiness for scale and paradigm-shift potential. Annex IV further outlines measures for the Secretariat to encourage and support DAEs to submit projects or programmes under the SAP, with the aim that submissions from such entities will, over time, constitute at least 50 per cent of all approved SAP proposals. It also establishes the broad principle that SAP proposals should be ready for scaling up, have the potential for transformation and promote a paradigm shift towards low-emission and climate-resilient development. The Board also requested continued simplification of the process and alignment with strategic programming.
10. The decision also requested the Secretariat to develop a proposal for in-between Board meeting approval of SAP funding proposals in the context of ongoing work to develop further options for decision-making.
11. The IEU submitted the SAP MAR to the Board one year after decision B.30/02 (see Annex VIII to document GCF/B.34/Inf.10). The MAR assessed the Secretariat's progress in implementing the evaluation's nine recommendations. The implementation of one recommendation was rated "high": developing key performance indicators for Secretariat performance to incentivize processing SAP proposals and projects. Implementation of two other recommendations was rated "substantial". The first concerned the Secretariat providing specific guidance for AEs on the SAP post-approval stage as part of the 2021 SAP delivery plan, along with revising internal SAP standard operating procedures. The second concerned the Secretariat developing a SAP capacity-strengthening programme tailored to the needs of DAEs and delivered through the Readiness and Preparatory Support Programme's (RPSP) delivery partners.
12. Two items received 'medium' adoption: partial steps towards rolling out the independent Technical Advisory Panel (iTAP)/SAP-specific monitoring and reporting, and clearer, lighter documentation.
13. Four areas were 'low': programming guidance, simplified review criteria, delegated approvals and a tailored private-sector approach.
14. The 2024–27 Strategic Plan prioritizes speed, simplicity, and direct access/partnerships.[6] SAP is expected to reduce median processing times, scale proven models, and increase DAE participation. The benchmarks are assessed in chapters 4 to 7.
15. At the forty-first meeting of the Board (B.41), the GCF Board had approved 49 SAP projects constituting 17 per cent of the total number of projects in the GCF portfolio. The total GCF financing approved within the 49 projects was USD 659 million.[7]

B. Objectives of this evaluation

16. This evaluation examines the coherence, relevance, effectiveness, efficiency, and impact of the SAP in enhancing access to GCF resources for developing countries, benchmarking it against the simplified access approaches of comparator institutions (see Table 1: Evaluation criteria and evaluation questions).

[6] GCF/B.25/12. "Review of the Simplified Approval Process Pilot Scheme"
[7] GCF Secretariat, Integrated Portfolio Management System (iPMS) data extract, as at B.41 (February 2025)

Table 1: Evaluation criteria and evaluation questions

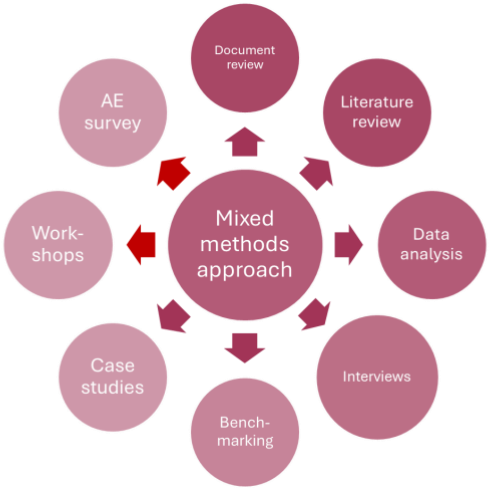
EVALUATION CRITERIA	EVALUATION QUESTIONS
Coherence	The degree to which the SAP operates in conjunction with other internal GCF modalities and policies to achieve strategic goals and objectives (internal coherence) and the level of consistency, complementarity, harmonization and coordination it has with other climate funds (external coherence), ensuring that the SAP adds value while not duplicating effort.
Relevance	The degree to which the GCF's SAP is fit-for-purpose, sufficiently targeted and agile in meeting the needs of developing countries, with an emphasis on the extent to which the objectives, design and operationalization of the SAP respond to and adapt to institutional needs.
Effectiveness	The degree to which the SAP successfully delivers on its mandate to streamline and speed up effective programming of climate projects, including identifying the factors that drive or hinder successful implementation, and assessing the extent to which the SAP achieves its objectives and expected results.
Efficiency	The extent to which the SAP modality delivers results using minimum financial and human resources and in a timely manner, compared with feasible alternatives in the GCF context.
Impact	The extent to which the SAP has generated significant positive or negative, intended or unintended, higher-level effects.

Source: Authors of this IEU evaluation, and in alignment with the evaluation criteria of the GCF Evaluation Policy.

C. METHODS

17. Using a mixed-methods approach, the evaluation combined qualitative and quantitative data, triangulated across sources, to ensure reliable evidence (see Figure 1 for methods).

Figure 1: Evaluation methods



Source: Authors of this IEU evaluation

18. The desk review encompassed GCF policies, strategies, and relevant literature to inform the evaluation framework, with selective use of large language models to support qualitative analysis. All AI-assisted outputs were reviewed and validated by the team. The evaluation adhered to principles of full disclosure, transparency, and accountability in AI use, ensuring that it enhanced trust in the evaluation process rather than undermined it.
19. Portfolio analysis compared the SAP and the project approval process (PAP) projects in terms of processing times, disbursement, and other performance indicators, using statistical tests and regression analysis to identify factors affecting efficiency and outcomes (see Annexes 4 and 5 in Volume II for methods). The full range of secondary data sources is listed in the approach paper for this evaluation.
20. Benchmarking compared simplified access modalities in key multilateral climate and vertical funds, identifying differentiating factors and standard practices (see Table 2)

Table 2: Comparator Funds for Benchmarking

COMPARATOR FUNDS FOR LANDSCAPE ANALYSIS AND BENCHMARKING		SIMPLIFIED ACCESS MODALITIES
Global Environment Facility	https://www.thegef.org	Small Grants Programme Medium-Sized Projects
Adaptation Fund	https://www.adaptation-fund.org/apply-funding/project-funding/	Country Cap Model
Climate Investment Funds	https://www.cif.org	Strategic Climate Fund Dedicated Grant Mechanism
Global Fund for AIDS, TB and Malaria	https://www.theglobalfund.org/en/	Challenging Operating Environment policy
Gavi, the Vaccine Alliance	https://www.gavi.org	Fragility, Emergencies and Refugees Policy

Source: IEU, based on information from the official websites of comparator funds

21. An online survey gathered the views, expectations and perceptions of AEs on SAP and PAP projects. The results were analysed for trends and triangulated with other data sources.[8]
22. The evaluation team conducted over 70 semi-structured key informant interviews across the GCF ecosystem, selecting participants based on their mandate and expertise. Interviews followed confidentiality and anonymity protocols and encouraged informants to share experiences and examples. A full list of respondents can be found in Annex 1, while the interview protocols are provided in SAP2025 Evaluation, Volume II, Annex 10.

[8] The survey was sent on 25 February and closed 5th March. The survey was sent to all 145 AEs and generated 30 responses. The majority of respondents, 73 per cent, identified their organization as part of the public sector, while 27 per cent indicated they belong to the private sector. Most respondents were from AEs that had an approved SAP project, at 51.9 per cent, while 44.4 per cent work at AEs developing a SAP project. Only one respondent worked for an AE that also acted as an executing entity for a SAP project. AEs were asked about their familiarity with the SAP modality. At 90 per cent, almost all AEs reported being aware of the modality, with only two respondents suggesting limited awareness. One respondent stated that they were not aware of the modality

23. Before conducting the key informant interviews, three short workshops were held with GCF personnel to gather initial observations on the SAP modality. Participants were selected to reflect varied experience, contract types and gender.
24. The evaluation also conducted SAP case studies. The sample of studies was drawn from the SAP portfolio based on how proponents, including the Global Environment Facility (GEF), the Adaptation Fund (AF), and the Climate Investment Funds (CIF), responded to the funding proposal (FP) question on scaling up prior initiatives and promoting a paradigm shift. Of 49 SAP projects, seven were selected. These projects cited clear antecedents[9] and had three or more APRs.[10] The case studies were conducted remotely. The evaluation team did not conduct any country case study travel. For a PAP comparison group, we reviewed the full GCF portfolio to identify six comparable projects, assessed by theme, risk and size. All six were well into development before the SAP was approved at the eighteenth meeting of the Board (B.18). Annex 7 lists the selected projects. Of the 13 case studies, 11 had finalized midterm evaluations that provided a useful external perspective on the results achieved to date.
25. The evaluation followed the ethical principles set out in the GCF Evaluation Standards, which are based on the United Nations Evaluation Group Ethical Guidelines. The evaluation team upheld the principles of integrity, professionalism, independence, impartiality, and sound judgment.

D. LIMITATIONS

26. The evaluation faced a range of limitations and risks that required careful management and mitigation.
27. Results, outcomes and impacts: Several factors limit the impact assessment, including the fact that many SAP projects are in early implementation, the portfolio is highly heterogeneous, and reporting systems focus on outputs rather than higher-level results. To address these constraints, the evaluation applied a purposive, stratified case study sample to identify cross-context success factors and challenges.
28. Data consistency after policy changes: The 2021 introduction of the Integrated Results Management Framework (IRMF) and the 2022 update to SAP resulted in key changes in reporting frameworks, potentially complicating comparisons of project outcomes, co-benefits, and performance. The team mitigated this by focusing on quantitative comparisons only on consistently measured indicators.
29. Staff changes impacting institutional memory: As with any maturing organization, changes in personnel over time have affected institutional memory, particularly regarding the evolution of the SAP modality since its introduction in October 2017 and subsequent modifications. The evaluation team addressed this by interviewing both long-standing and former staff members.

[9] For each project, a desk study determined the predecessor project or activity on which the SAP was based and relevant documentation was obtained (e.g. World Bank project documents, GEF PIF, an evaluation supported by Agence Française de Développement [French Development Agency]). In addition, GCF project funding proposals, AE-produced midterm evaluations, and AE-produced annual performance reports were used to understand the project design, its context, achievements and challenges

[10] As with the wider SAP portfolio, the case studies reviewed were overwhelmingly adaptation-themed projects, framed using the Initial Results Management Framework established at the seventh meeting of the Board (B.07), before the current Integrated Results Management Framework was approved at the twenty-eighth meeting of the Board (B.28). The tables in IEU SAP2025 Evaluation, Volume II, Annex 8 note that not all projects respond to all expected results as this depends on whether their theme is adaptation, mitigation or cross-cutting. In addition, the indicators used by the different projects to track results varied

30. Stakeholder participation constraints: The geographic dispersion of stakeholders, language barriers, and time constraints limited participation rates in primary data-collection. The team mitigated this through early outreach and flexible scheduling across time zones.
31. Time pressure and analysis depth: The requirement to complete the evaluation within eight months created time pressure, necessitating trade-offs between depth and breadth of analysis. The team mitigated this by starting data-collection early and setting clear minimum evidence requirements.
32. Benchmarking data access: Benchmarking focused on specific comparators (see para. 19 above), with transparency about any information gaps identified through triangulation of public information and targeted interviews. Annex 6 of volume II references all the documents reviewed, and at least one key informant for each comparator was involved.
33. The evaluation team has continuously monitored risks throughout implementation and adjusted mitigation measures as needed to ensure a robust and credible draft evaluation. The evaluation was led by the IEU, which is responsible for its substantive content and presentation to the Board for its decision. Risks were monitored throughout, with mitigation measures adjusted as needed to ensure a robust and credible draft.

II. SAP IN THE CONTEXT OF GCF REFORM

34. This chapter assesses the SAP's contribution to the GCF's strategic objectives and its coherence within the Fund's evolving architecture. It examines whether the SAP has delivered on its promise of faster and simpler access, how it interacts with other GCF modalities, and the extent to which it overlaps with comparable mechanisms in other climate funds. The analysis highlights persistent tensions between the SAP's intended role and its operational reality, raising questions about whether it retains a distinct niche or has become increasingly indistinguishable from other approval routes.

KEY TAKEAWAYS

The SAP has made only a limited contribution to the GCF's strategic targets. While much of its portfolio is concentrated in adaptation and food security, weak integration with the RPSP has prevented these investments from linking effectively to national adaptation planning. Fragmented procedures and limited coordination with other GCF modalities constrain internal coherence. Externally, the SAP's high ceiling and Board approval requirements leave it awkwardly positioned, too large for community projects, too small for transformational interventions, offering limited added value compared to other simplified mechanisms.

A. CONTRIBUTION TO GCF'S STRATEGY

35. **The SAP was established to provide faster and more accessible access to GCF resources, particularly for smaller-scale adaptation and mitigation projects in vulnerable countries. Seven years on, its contribution to GCF's strategic objectives is limited, and its distinctiveness has diminished.**

36. Assessing against the specific benchmarks of the GCF's 2024–2027 Strategic Plan highlights why SAP's overall contribution remains limited. The modality has served as a test bed for simplifying templates and processes, but median processing times have not improved sufficiently to demonstrate clear strategic value in speed or predictability. On direct access, the Board set a target of at least half of SAP approvals being led by DAEs. Yet, by B.41, less than half of the 49 approved SAP projects were submitted by DAEs, showing that the gateway function has been only partially realized. SAP projects have supported adaptation priorities in agriculture, ecosystems and early warning systems, but at a modest scale relative to portfolio-wide targets. Taken together, these partial contributions help to explain why the SAP's role in advancing GCF's strategic objectives is viewed as constrained.

37. The SAP operates alongside multiple GCF access modalities with overlapping functions, lacks consistent integration with RPSP and other support, and has not secured a comparative advantage over other climate finance mechanisms. A combination of institutional arrangements, procedural requirements, and risk restrictions constrains its ability to deliver the intended speed and simplicity. While some of these factors are structural features of the GCF's governance, others could be addressed through adjustments to the SAP's design and implementation. These challenges reflect broader institutional design tensions within the GCF, and resolving them is central to aligning the SAP's role with the wider reform agenda.

38. The SAP was launched to provide a faster, simpler approval route for smaller-scale projects, particularly in vulnerable countries. Secretariat contributors to the evaluation observed that, in seeking to optimize and accelerate project preparation, operational improvements emerged from the SAP experience, with the SAP team introducing new templates, review tools, and streamlined documentation requirements. Some of these features were later reflected in the mainstream PAP, and this is now accelerating with the wider Efficient GCF initiative.[11] While this transfer of practices was not the SAP's primary purpose, it had the effect of narrowing the operational differences between the SAP and other modalities, reducing its distinct niche.
39. **The SAP and the PAP have become operationally indistinguishable, undermining the rationale for maintaining separate modalities.** Stakeholder interviews confirm that SAP submissions face the same review criteria and depth as PAP proposals, despite the SAP's lower-risk categorization and smaller scale.[12] Several contributors noted that the same review teams handle both SAP and large-scale PAP proposals, which makes it challenging to apply proportionate standards and processes.[13] In practice, the promised simplification is less evident, eroding the SAP's distinct value proposition.
40. The SAP offers limited added value within the crowded climate finance landscape. Of the 82 per cent of AEs with experience in other funds, more than a third report that the SAP provides "no added value" regarding speed, accessibility or flexibility as compared to established alternatives.[14] The SAP's USD 25 million ceiling creates awkward positioning between community-scale and transformative programming. This ceiling significantly exceeds the AF's USD 5 million or GEF's USD 2 million thresholds, placing the SAP in an institutional middle ground that requires sophisticated preparation capacity while remaining too small for genuinely transformational interventions.
41. Collectively, these findings highlight persistent gaps in internal coherence. The SAP's niche has narrowed as its processes have converged with those of the PAP, while coordination with other GCF modalities remains limited. Together, these factors constrain its ability to operate as a clearly differentiated, strategically aligned approval route.

B. SAP's External Positioning and Overlap with Other Funds

42. **The SAP's governance complexity creates inherent delays compared to the comparator funds' more streamlined approaches.** While the SAP requires full GCF Board approval, successful simplified mechanisms employ delegated authority structures (Gavi allows CEO approval under its Fragility, Emergencies, Displacement and Preparedness framework, and the Global Fund's Challenging Operating Environments allows a "no-objection electronic approval"). The GEF's Least Developed Countries Fund (LDCF) delegates authority to the GEF CEO within agreed parameters;

[11] In December 2023, the GCF Secretariat launched the Efficient GCF initiative to simplify project review and approval, streamline documentation, and strengthen partner engagement. See Green Climate Fund, Efficient GCF. Available at https://www.greenclimate.fund/about/efficient-gcf
[12] AE key informants also observed that because the review process was essentially the same there was a diminished incentive to pursue the SAP application route rather than the PAP
[13] KIIs (ITAP-1, ITAP-18, DAE-15)
[14] IEU Survey of Accredited Entities, 2024 (n=30)

the AF applies one-step procedures that allow the Board to decide on proposals more quickly; and the CIF rely on trust fund committees, rather than the full governing body, to approve projects.[15]

43. Among climate finance peers, the AF's enhanced direct access (EDA) is capped at USD 5 million per country, compared with the GEF's Medium-Sized Projects, which are approved by the CEO at USD 2 million. This is also less than the USD 5,000 allocated for community subgrants under the CIF's Dedicated Grant Mechanism.[16] By contrast, the SAP's USD 25 million ceiling can widen access to mid-sized proposals but also raises preparation requirements beyond the capacity of many smaller entities. Several stakeholders noted that in some low-capacity or fragile contexts, USD 25 million is more than can be realistically and effectively programmed within the SAP's ESS constraints.[17] At the same time, the ceiling remains below the scale needed for genuinely transformational interventions, creating a niche that is not clearly aligned with the needs of the most capacity-constrained contexts it seeks to serve.
44. Eligibility criteria are central to how simplified mechanisms complement or compete with other funding channels. In climate finance, the GEF's LDCF serves only LDCs, the AF's EDA prioritizes national institutions in developing countries, and the CIF's Dedicated Grant Mechanism channels resources directly to local communities. Beyond climate, the Global Fund's Challenging Operating Environment policy is tailored to fragile contexts, and Gavi's emergency policy targets countries with chronic fragility.
45. By contrast, the SAP maintains open eligibility for all developing countries via any AE. In principle, even high-capacity countries could apply a breadth that weakens the SAP's strategic positioning and makes it harder to demonstrate a clearly defined value-added proposition alongside more targeted mechanisms.
46. Table 3 compares the SAP's key design and performance features with other simplified mechanisms, focusing on access model, scope, governance, and indicative processing times. It illustrates where the SAP's structure aligns with, or diverges from, the approaches of peer funds.

[15] Based on information summarized in Independent Evaluation Unit (IEU), Evaluation of the GCF's Simplified Approval Process (SAP), Volume II: Annexes, Annex 7, Table 2 ("Governance and decision-making structures"), entries for GEF-LDCF, Adaptation Fund, and CIF
[16] SAP2025 Evaluation, Volume II, Annex 7, Table 3, "Operational scale and funding limits"
[17] KIIs (AE-2, AE-3, AE-4, AE-7, AE-33, AE-42, AE-62; DAE-2, DAE-21)

Table 3: Simplified Access Mechanism Comparisons

Issue	**GCF** Simplified Approval Process	**GEF** Least Developed Countries Fund	**AF** Enhanced Direct Access	**CIF** Dedicated Grant Mechanism	**Global Fund** Challenging Operating Environment Policy	**Gavi** Fragility, Emergencies and Displacement Policy
Eligibility & Targeting	Developing countries' small-scale climate projects via AEs, all GCF-eligible developing countries	LDC governments and agencies implementing adaptation priorities, LDCs only (currently 46)	National implementing entities in developing countries with direct access to accreditation. All developing countries are eligible for AF with accredited NIEs	Indigenous Peoples and Local Communities in Forest Investment Program in pilot countries, FIP pilot countries only (initial 8, later expanded to ~13)	Health ministries and Civil Society Organizations (CSOs) operating in fragile/conflict settings, ~130 countries; Challenging Operating Environment (COE) policy applicable to fragile/conflict-affected contexts	National immunization programmes in 57 Gavi-eligible countries; FEDP applies in fragile, emergency or displacement settings
Approval Authority	GCF Board (24 members; equal developed/ developing country representation); Board approves SAP projects	GEF Council (32 members; 16 from developing countries, 14 from developed, 2 from Europe and Central Asia/transitional), CEO approval within Board parameters	AF Board (16 members; 7 developing, 2 LDCs/SIDS, 2 Annex I, 2 Annex II, 3 others), CEO approval within Board parameters	National Steering Committees (NSCs) in each country, majority Indigenous People and Local Communities representatives; Global Steering Committee provides overall guidance, Governing body approval in-country	Global Fund Board (20 voting members: 10 implementers, 10 donors; plus non-voting CSOs, private sector, foundations), CEO or delegated authority	Gavi Board (28 members, including implementing countries, donors, WHO, UNICEF, WB, CSOs, private sector, foundations), CEO or delegated authority
Funding Ceiling	≤ USD 25 million GCF contribution	No explicit ceiling; typically, USD 1-10M	USD ≤ 5 million per EDA project	Country DGM ~USD 4-6M total, individual subgrants usually ≤USD 100k	Varies by grant, no specific ceiling under COE policy	Varies by grant; FEDP applies flexibility within Gavi's standard country ceilings
Typical Processing Time[18]	~12 months from concept to approval	~24–28 months	~6–12 months	~6–12 months to approval; longer to disbursement	~9–12 months; Timelines may be faster in emergency contexts	Emergency approvals ~1–2 months; routine ~6+ months

[18] Indicative estimates based on available documentation and interview insights; actual times vary by project and context

Issue	**GCF** Simplified Approval Process	**GEF** Least Developed Countries Fund	**AF** Enhanced Direct Access	**CIF** Dedicated Grant Mechanism	**Global Fund** Challenging Operating Environment Policy	**Gavi** Fragility, Emergencies and Displacement Policy
Risk Category/ Scope	Category C only (minimal/no risk)	Wide (LDCF follows GEF safeguards; Category B or C common)	Allows moderate/high-risk if safeguards are managed	Low-moderate risk activities; multilateral development bank safeguards apply	Varies by grant; COE focuses on risk management in fragile contexts	N/A (health systems support; focuses on operational flexibility in fragile settings)

Source: Evaluation team, based on GCF Board decisions B.18/06 and B.32/05, and comparator fund documentation. See SAP2025 Evaluation Volume II, Annex 7, *Benchmarking Comparison Matrices*.

47. Table 3 illustrates that compared to peer mechanisms, the SAP offers a relatively high funding ceiling and broad eligibility but requires full Board approval and has longer indicative processing times. This combination affects its ability to match the speed and targeting of other simplified approaches.
48. The SAP's eligibility is restricted to Category C/ I-3 projects ("minimal or no environmental and social risk"), excluding many adaptation measures that inherently involve moderate risk, such as coastal protection or resilient agriculture.[19] By way of contrast with the SAP, the AF and the GEF manage rather than exclude higher-risk activities, applying safeguard procedures to enable investment in these contexts.[20]
49. Taken together, the SAP's governance requirements, high but non-transformational ceiling, broad eligibility, and restrictive risk criteria position it largely in parallel to, rather than in coordination with, other funds. Despite the Board's direction to strengthen inter-fund complementarity and coherence (Decision B.17/04, Annex II; Decision B.35/12, paragraph (e))[21], this limits external coherence and makes the SAP's distinct role in the climate finance landscape less clear.

C. Operational Benchmarking: How the SAP Compares in Practice

Table 4: Evolution of Simplified Approval Process Compared to the Project Approval Process

Stage	SAP (before B.32)	SAP (after B.32)	PAP
Requirements	• ESS Category C / I-3 only (minimal risk) • Funding cap: USD 10 million GCF contribution	• ESS Category C / I-3 only (minimal risk) • Funding cap increased: USD 25 million GCF contribution	• Broader ESS categories (C, B, A) • No funding cap • Full documentation (environmental and social action plan, feasibility, financial/economic analysis)
Submission	• Simplified CN and FP templates • Mandatory CN- Fewer annexes	• Further simplified CN/FP templates • Optional CN (encouraged) • SAP checklist and additional guidance • Reduced annexes	• Regular FP templates-Optional CN • Full supporting documents (varies by project)

[19] Examples drawn from comparator fund experience found in SAP2025 Evaluation Volume II: Adaptation Fund (small-scale coastal protection, Annex 7, Table 1 "Macro features"), GEF MSPs (resilient agriculture, Annex 7, Table 3 "Operational scale and funding limits"), and CIF Dedicated Grant Mechanism (community forestry and NRM, Annex 7, Table 3). These show that simplified approval pathways in other funds encompass moderate-risk adaptation activities
[20] Volume II, Annex 7, Table 1 ("Macro features of comparator funds") and Table 3 ("Operational scale and funding limits"). The Adaptation Fund applies its Environmental and Social Policy across projects of varying risk categories, and the GEF Medium-Sized Projects are subject to the GEF Safeguard Standards rather than being restricted to Category C
[21] Decision B.17/04, Annex II. "Operational Framework on Complementarity and Coherence." ; and Decision B.35/12, paragraph (e), requesting the Secretariat to explore options for enhanced coherence and complementarity with other bilateral, regional, and global climate finance mechanisms

STAGE	SAP (BEFORE B.32)	SAP (AFTER B.32)	PAP
Review	• Secretariat + iTAP appraisal • Checklist-based	• Streamlined appraisal by Secretariat + iTAP • Enhanced checklist tools • Piloting external review options • Board approval required	• Full appraisal by Secretariat + iTAP • Board approval required
Post-Approval	• —	• Revised FAA legal template	• Standard FAA legal template

Source: IEU evaluation team, based on GCF Board decisions B.18/06 and B.32/05.

50. **The SAP's 12-month average timeline mirrors full-sized proposal processes rather than achieving genuine simplification.** This average contrasts with the AF's 6–12-month cycles through consolidated review and intersessional approval capabilities, while GEF achieves 4-6 months for CEO-approved projects. The CIF Dedicated Grant Mechanism uses NSCs to approve community subgrants within the same time frame without global Board involvement.[22]
51. The SAP **proposals undergo the same review criteria and depth as full-sized GCF submissions, despite being smaller in scale and limited to lower-risk (Category C/ I-3) activities.** Stakeholder interviews highlighted the difficulty for reviewers in "shifting gears" between assessing high-value, higher-risk proposals and smaller, low-risk SAP submissions.[23] By contrast, the GEF's Medium-Sized Projects follow a streamlined approval process, overseen by the CEO, which does not require Council review, reserving the more extensive procedures for larger projects.
52. **The GCF's separate preparation facility can add six months or more to the timeline, creating a circular barrier for lower-capacity entities**. In contrast, other funds integrate preparation support into their processes. For example, the AF allows NIEs at the concept stage to receive Project Formulation Grants (PFGs) of up to USD 50,000, and the GEF offers Project Preparation Grants ranging from USD 50,000 to USD 150,000 depending on project size, within its Project Identification Form (PIF) process.[24] By contrast, the SAP requires a separate application to the Project Preparation Facility, which AEs report can add six months or more to the timeline, and which itself requires external support.[25]
53. Comparison simplified mechanisms avoid case-by-case Board decisions by delegating approval authority, enabling faster responses. Gavi's emergency policy authorizes the CEO to approve funding within Board-set parameters, often within weeks. The Global Fund applies a "no-objection" electronic approval system for most grants.[26] By contrast, the SAP maintains formal Board consideration for each proposal at scheduled meetings, creating delays that procedural quality alone cannot overcome and weakening its claim to simplification.

[22] SAP2025 Evaluation, Volume II, Annex 7, Table 2 ("Governance and decision-making structures") and Table 4 ("Procedural simplification measures")
[23] KIIs (e.g. AE-5, AE-6, ITAP-1, ITAP-18)
[24] SAP2025 Evaluation, Volume II, Annex 7, Table 4 ("Procedural simplification measures"), showing comparative embedded support; Adaptation Fund Project Formulation Grant policy (up to USD 50,000); GEF Project Preparation Grant guidelines (USD 50,000 for MSP, up to USD 150,000 for larger projects)
[25] KIIs with Accredited Entities (e.g. AE-13, AE-26, AE-64)
[26] Gavi, the Vaccine Alliance (2018, 2023), "Fragility, Emergencies and Displacement Policy"; The Global Fund to Fight AIDS, Tuberculosis and Malaria (2016, 2022b), "Challenging Operating Environment Policy"

54. **The SAP's procedural inconsistencies continue to generate confusion.** The SAP's procedural ambiguities create real uncertainty for AEs. Key informants observed the uneven interpretation and implementation of the SAP's review procedures, leading to repetitive comments and requirements to revisit issues already addressed.[27] The current December 2023 Programming Guidelines state that CNs are "not mandatory", the guidance implies they are.[28] Key informants reported that they were advised to complete optional annexes "just in case" to avoid questions at the review stage. Stakeholders also cited inconsistencies such as changing focal points and unclear messaging in guidance materials. These inconsistencies contrast with the AF's use of dedicated reviewers (main and second readers) for continuity, and the GEF's codified institutional processes that reduce confusion for applicants.

55. Benchmarking shows that the SAP is closer to full-sized GCF proposals than to mechanisms designed for faster, more accessible delivery. Some comparator funds, such as the AF's streamlined Secretariat review or the GEF's Medium-Sized Projects, were not designed as simplified versions of a more complex process. Others, including Gavi's emergency policy and the Global Fund's Challenging Operating Environments approach, were specifically designed to reduce procedural barriers in crises. The SAP, however, follows the same procedural steps and timelines as standard GCF proposals. It also lacks features that make other pathways faster, such as integrated preparation support, delegated authority, and standardized review procedures. These shortcomings reflect design choice rather than operational inefficiency, and they limit the SAP's ability to achieve its simplification goal.

D. Design Challenges: the SAP's Internal Coherence within the GCF Architecture

56. **The SAP operates with minimal integration with RPSP, despite the clear potential to connect upstream capacity strengthening with downstream project development.** The revised RPSP strategy allocates each DAE up to USD 1 million over a four-year period to strengthen climate programming capacity.[29] Secretariat staff noted that, more than a year after the revised RPSP strategy's approval, there had been no structured interactions with the SAP team. Interviewees described the SAP as "not integrated with the RPSP team" and "operating in fragmented processes."[30] Secretariat staff confirmed that while the RPSP has supported DAEs in project preparation, these efforts have not been connected with the SAP. Interviewees emphasized that the SAP team operates independently from the RPSP and other support facilities, despite the original intent for closer integration. [31] This lack of coordination means upstream capacity-strengthening resources are not being linked to downstream project preparation, despite Strategic Plan commitments to strengthen DAE programming capacity. This disconnect reflects entrenched institutional silos, where formal commitments to link readiness support with project delivery have not translated into practice. The SAP's procedural and risk requirements remain difficult for

[27] KII AE-10, AE-16, AE-22, AE-23
[28] GCF, "Programming Guidelines for the Simplified Approval Process", November 2023
[29] Green Climate Fund. *Readiness and Preparatory Support Programme: Direct Access Entity Window*. Available at: https://www.greenclimate.fund/readiness/dae-window (accessed August 2025)
[30] KII SAP-10, SAP-24, SAP-29, SAP-30
[31] KII Sec-63, SAP-24, SAP-29, SAP-30

less-resourced entities to meet. Limited access to capacity support creates a circular dynamic in which entities need capacity to secure funding but require funding to build that capacity.

57. The SAP's portfolio composition runs counter to the Strategic Plan 2024–2027 target of doubling the number of DAEs with approved funding. IAEs hold USD 350 million in SAP approvals compared to USD 309 million for DAEs, representing 53 per cent of total SAP funding to IAEs.[32] This imbalance raises questions about whether the SAP is fulfilling its intended role as a pathway for strengthening national institutions or instead functioning primarily as a channel for experienced international entities.
58. **The SAP engages selectively, rather than systematically, with other GCF modalities.** The Project Preparation Facility is a notable exception: up to USD 1.5 million can be approved under delegated authority to regional directors, providing a rare example of an internal GCF mechanism operating without full Board approval.[33] Beyond this, the SAP maintains no formal linkages with EDA, the PSAA, or REDD+ Results-Based Payments, despite overlapping objectives and target beneficiary groups. The absence of these linkages limits opportunities for coordinated programming and shared learning across modalities.
59. Each GCF modality maintains separate application processes and eligibility criteria, creating institutional fragmentation. The proliferation of parallel tracks increases complexity and confusion for entities rather than providing coherent access pathways. Examples of these parallel tracks include the SAP, the PAP, EDA, the Project-Specific Assessment Approach (PSAA), and REDD+. The SAP requires standard accreditation, while the PSAA allows project-level assessment. The SAP follows a CN to FP sequence, while EDA provides national entities with approved envelopes and devolved decision-making; the SAP offers ex-ante financing, whereas REDD+ Results-Based Payments disburses funds only after results are verified.[34] This proliferation of parallel tracks increases transaction costs for applicants, who must navigate multiple systems rather than accessing integrated support pathways. It reflects a focus on maintaining the modality's distinctiveness rather than enhancing user experience and operational efficiency.
60. **Despite a portfolio concentrated in relevant sectors, the SAP makes only a limited contribution to the Strategic Plan adaptation targets.** The goal of 50–60 developing countries with new or improved early warning systems is hindered by the SAP's lack of integration with RPSP programming, limiting alignment with national adaptation planning. Similarly, the target of 190–280 million beneficiaries adopting climate-resilient agricultural practices remains unlinked to the SAP's substantial food security portfolio due to the absence of programmatic connections with upstream support mechanisms.
61. Evidence suggests that persistent institutional silos limit the SAP's internal coherence**.** Despite shared strategic objectives with other GCF modalities, the SAP functions largely as a stand-alone process within the access architecture. This isolation sustains, rather than addresses, barriers to country ownership and direct access, and constrains delivery on the Strategic Plan's commitments.
62. Overall, the SAP's lack of alignment with other GCF modalities reflects structural issues across the Fund's design. Multiple parallel access tracks with separate eligibility criteria and review processes create institutional fragmentation, confusing applicants and adding transaction costs. Limited

[32] Based on GCF portfolio data (as of April 2025), IAEs held USD 350m in SAP approvals compared to USD 309m for DAEs. This contrasts with the Strategic Plan 2024–2027 target of doubling the number of DAEs with approved funding (GCF/B.35/12/Rev.01)
[33] See GCF (2016b). GCF/B.13/14. "Operational guidelines for the Project Preparation Facility." See also SAP2025 Evaluation, Volume II, Annex 7, Table 2 ("Governance and decision-making structures")
[34] SAP2025 Evaluation, Volume II, Annex 8: Internal Coherence of SAP vis-à-vis Other GCF Modalities

interoperability with other modalities and weak coordination with RPSP programming in particular constrain the SAP's ability to serve as a coherent access pathway for developing countries.

E. Strategic Implications for Reform

63. **The SAP's coherence challenges reflect the GCF's broader tension between its wide-ranging mandate and the need for operational focus.** Unlike the AF's exclusive adaptation remit or the GEF's targeted LDCF with delegated approval,[35] the SAP spans mitigation, adaptation, and cross-cutting themes for all developing countries. This breadth of scope creates positioning challenges that procedural adjustments alone are unlikely to resolve.
64. External differentiation requires either a distinctive value proposition or demonstrably greater efficiency, but the SAP offers neither. The CIF's Dedicated Grant Mechanism is defined by community-led governance, while Gavi's emergency policy achieves speed through delegated approvals. In comparison, the SAP's USD 25 million ceiling and Category C risk restriction position it awkwardly between small-scale community projects and transformational programming, offering no clear advantage over other available mechanisms.
65. Evidence from comparator funds shows that real internal coherence depends on integration into core systems and decision-making structures, rather than only procedural coordination. Other climate funds link capacity support directly to proposal processes, such as the AF's PFGs and the GEF's integrated preparation support. In contrast, the SAP requires separate PPF applications, even when there are clear synergies.
66. Current overlaps between the SAP and other GCF access modalities, such as the RPSP, the Project Preparation Facility (PPF), and the PSAA, highlight a lack of strategic differentiation. Without clearer integration or distinction, the SAP remains one of several parallel processes competing for similar applicants and objectives, reinforcing rather than reducing the fragmentation in the GCF's access architecture.
67. The SAP's coherence challenges reflect broader institutional design tensions that require strategic resolution. Maintaining multiple parallel modalities with limited coordination adds complexity without delivering commensurate benefits. Avoiding duplication and ensuring added value will depend on clear choices about the SAP's role within both the GCF's internal architecture and the wider climate finance landscape, rather than on incremental adjustments to current arrangements.
68. These design weaknesses have operational consequences: disconnection from the RPSP, fragmented support, and convergence with standard processes dilute the SAP's speed and simplification objectives. Examining the SAP's operational record across entity types, sectors, and support systems in the next chapter will show how these structural barriers translate into real-world performance.

[35] SAP2025 Evaluation, Volume II, Annex 7, Tables 1–2 (Macro Features; Governance and Decision-Making Structures) for comparison of mandates and approval authority

III. SAP IN A ONE-SIZE-FITS-ALL APPROACH

69. This chapter examines the SAP's continued relevance and its internal coherence within the GCF architecture, moving from portfolio composition and targeting as of B.41 to the mechanism's responsiveness to institutional change. It assesses whether the SAP's design parameters remain fit-for-purpose, whether implementation practices align with its stated objectives, and the extent to which the modality delivers added value without duplicating other GCF instruments.

KEY TAKEAWAYS

The SAP's design functions as a one-size-fits-all mechanism, with contradictory requirements that strain coherence. While financing is concentrated in vulnerable countries, IAEs still outpace DAEs, and adaptation projects dominate yet face the longest processing times. High transaction costs, lengthy reviews, and rigid post-approval procedures negate simplification and erode predictability. Stakeholders increasingly view the SAP less as a streamlined access route than as a stepping-stone for institutional learning, highlighting tensions between efficiency and capacity-strengthening roles.

A. DESIGN FRAMEWORK CONSTRAINTS

70. Article 9.9 of the Paris Agreement and paragraph 3 of the GCF Governing Instrument require operating entities to ensure efficient access through simplified approval procedures.[36] Recent guidance from the Conference of the Parties has reinforced the need to streamline and simplify access. This section assesses whether SAP implementation aligns with these institutional commitments for predictability, simplicity, speed, and direct access, drawing on survey data, interview findings, and portfolio analysis.

71. **Evidence indicates a persistent tension in the SAP's implementation. While designed with defined parameters to serve specific constituencies, stakeholders report that the SAP applies largely uniform processes regardless of entity type, country context, or project complexity.**[37] Survey and interview feedback show minimal procedural differentiation between experienced IAEs and capacity-constrained DAEs, between stable and fragile contexts, or between replication and innovation.[38] This standardization contradicts the SAP's intent of tailored simplification, with several stakeholders noting that the "simplified" requirements often match those of the PAP. As a result, the modality may both limit access for some target entities and miss opportunities to maximize engagement with those it does serve.

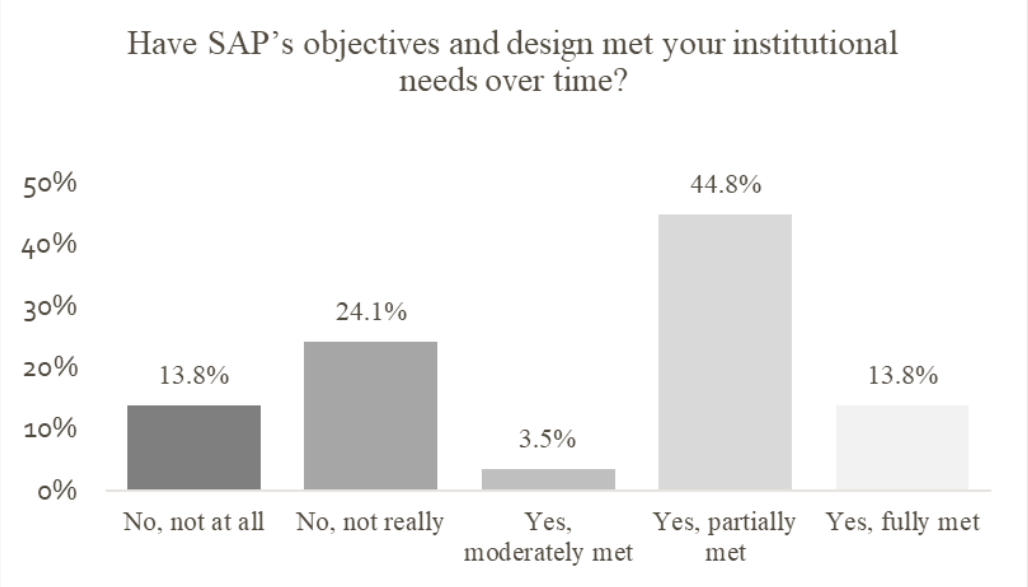
72. Generic, one-size-fits-all approaches have limited value. Key informants emphasized that the SAP's value for DAEs depends on processes and criteria adapted to their operational realities. Several respondents described how generic procedures limit relevance, calling instead for tailored approaches that reflect the substantial capacity constraints faced by many DAEs. Without such

[36] UNFCCC, Paris Agreement, Article 9.9; Green Climate Fund, Governing Instrument, para. 53 (see Volume II, Annex 2)
[37] The survey was sent to all accredited entities as of B.41, including direct national, direct regional and IAEs. The survey was sent on 25 February, with a closing date of 5 March. The survey generated 30 responses
[38] Evaluation team analysis, based on Accredited Entity survey (SAP2025 Evaluation, Volume II, Annex 11) and key informant interviews (AE-5, AE-6, AE-60, DAE-15)

adaptation, they cautioned, the SAP's accessibility remains only partially realized, and barriers to entry may persist rather than diminish.

73. Although the SAP is positioned as a tailored mechanism, in practice, it operates as a one-size-fits-all approach. Its design features are difficult to reconcile in a single project, including requirements regarding DAE, Category C, ≤$25M, scalable, innovative, and paradigm shift. The modality's design attempts to reconcile multiple, often contradictory objectives: serving DAEs while requiring sophisticated preparation capacity, maintaining Category C risk restrictions while expecting paradigm-shifting outcomes, and promoting innovation while demanding evidence of scalability from proven models. Survey and interview feedback show minimal procedural differentiation between experienced IAEs and capacity-constrained DAEs, between stable and fragile contexts, or between replication and innovation projects. Stakeholders report that the "simplified" requirements often align with those of the PAP, with generic procedures that limit relevance rather than adapting to the substantial capacity constraints faced by many target entities. This standardization contradicts the SAP's intent of tailored simplification, creating a modality that neither maximizes engagement with experienced entities nor adequately accommodates the operational realities of less-resourced implementers, ultimately serving neither constituency optimally.
74. This finding of a "one-size-fits-all" approach within the SAP should not be read as inconsistent with the earlier critique of multiple parallel access tracks. The latter reflects inefficiency across the GCF architecture, where applicants must navigate several overlapping modalities with distinct procedures. By contrast, the "one-size-fits-all" issue is internal to the SAP itself, where uniform design parameters are applied regardless of context or entity type. Taken together, the two findings point to a dual challenge: fragmentation across GCF modalities combined with rigidity within the SAP.
75. While AE respondents generally viewed the SAP as relevant for developing countries, they were less positive about how well its design and objectives met their needs. As shown in Figure 2, only 13.8 per cent reported that their needs were fully met, while 48.3 per cent said they were moderately or partially met. A further 24.1 per cent said their needs were "not really" met, and 13.8 per cent "not at all."

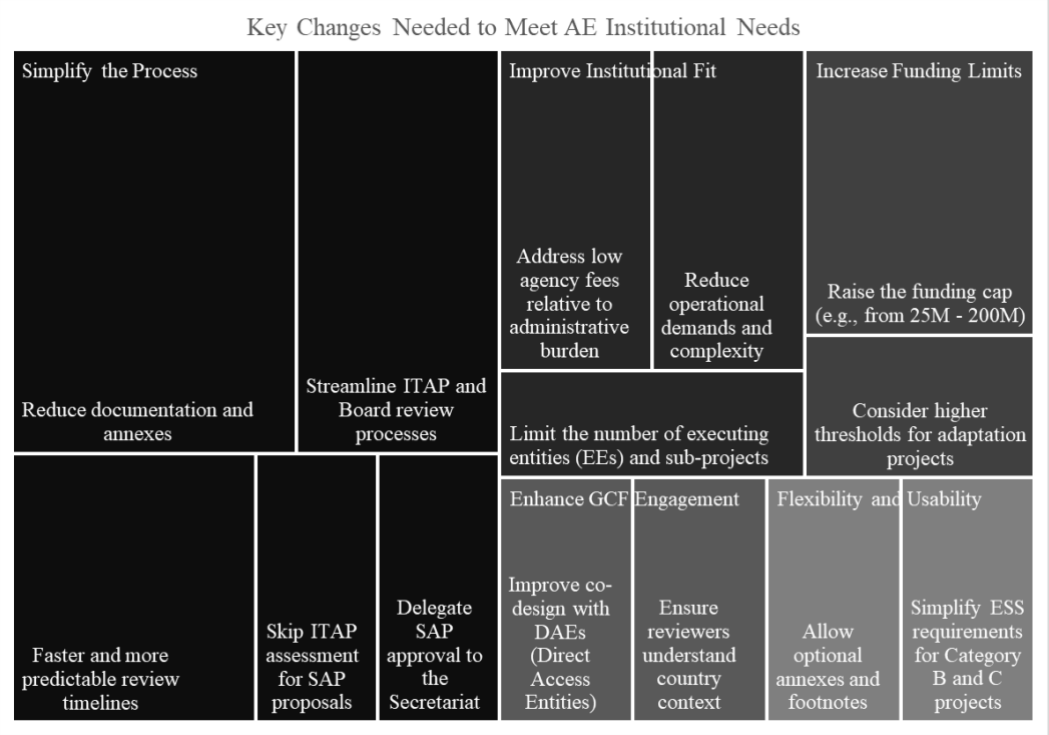
Figure 2: Have the SAP's Objectives and design met your institutional needs over time?



Source: IEU survey of AEs (n=30), percentages may not sum due to rounding

76. AE respondents recommended several changes to better meet their needs, notably reducing documentation, streamlining reviews, and simplifying iTAP and Board assessments for SAP proposals. They also called for higher AE fee rates, reduced operational complexity, and increased funding limits. Other suggestions included greater GCF engagement, improved co-design with DAEs, delegated authority, and more flexible requirements, particularly for ESS, as illustrated in Figure 3: Key Changes Needed to Meet AE Institutional Needs.

Figure 3: Key Changes Needed to Meet AE Institutional Needs



Source: IEU survey of AEs (n=30)

B. WHO IS THE SAP REALLY SERVING?

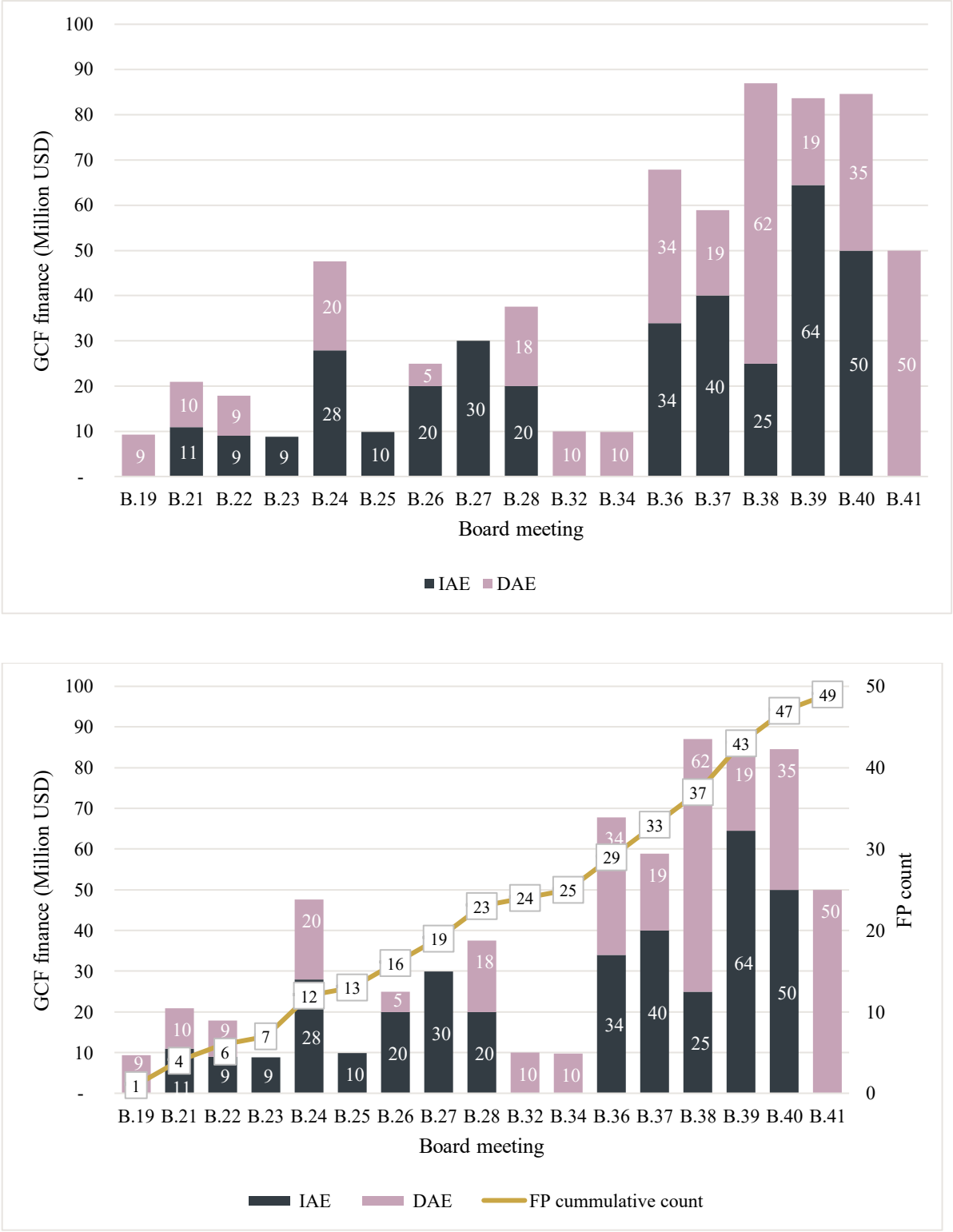
77. The SAP portfolio comprises 49 approved projects, representing 17 per cent of the GCF portfolio and totalling USD 659 million, with a co-finance ratio of 0.61. The portfolio is heavily focused on adaptation projects, 73 per cent of which are primarily delivered through grants. Overall, grants account for 88 per cent of total SAP financing, reflecting both the Category C constraint and the focus of vulnerable countries.

78. The SAP's design parameters and institutional rationale are set out in full in Chapter II. Here, they are recalled only where directly relevant to evaluating the alignment between design and implementation. The analysis draws on Board decisions, the SAP2020 evaluation (IEU, 2020) and iPMS data to situate current portfolio performance against the modality's foundational vision, with emphasis on its targeting of adaptation, vulnerable countries, and DAEs.

79. The SAP portfolio has grown steadily since its launch, with notable acceleration following the reforms in decision B.32/05. As of B.41, 49 SAP projects had been approved, representing 17 per cent of the GCF portfolio by number. SAP approvals totalled USD 659 million, supplemented by USD 404 million in co-finance, yielding a co-finance ratio of 0.61. Figure 4: The SAP Portfolio

through time charts the evolution of the SAP portfolio over time, illustrating both the increase in approved finance and the recent growth in volume.39

Figure 4: The SAP Portfolio through time



Source: iPMS data via semantic model as at B.41, n=49 (17-20 Feb 2025)

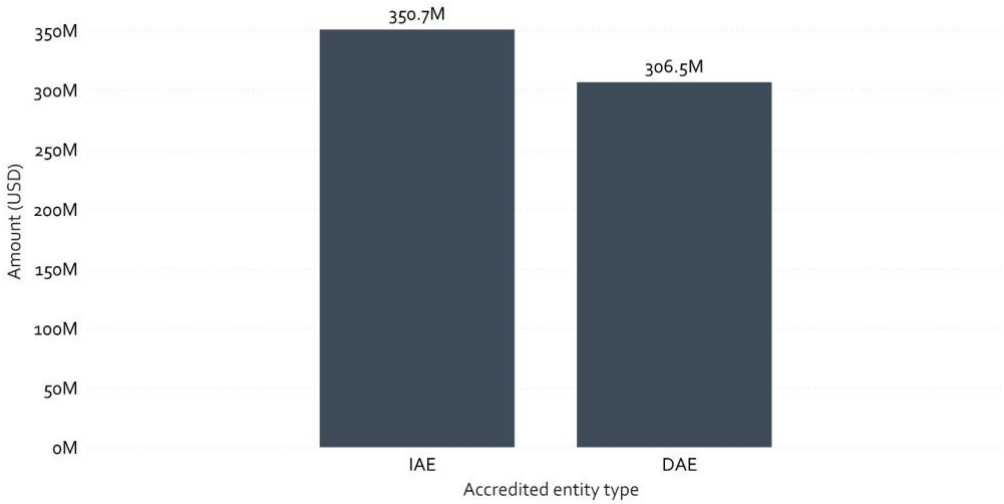
[39] Calculations based on iPMS data via semantic model as at B.41

80. **Post-B.32 acceleration.** The period from B.33 to B.41 saw USD 442 million approved through the SAP, 2.76 times the USD 160 million approved between B.24 and B.32. This increase exceeded the 2.5-fold rise in the maximum SAP project size from USD 10 million to USD 25 million, suggesting greater demand among AEs for this modality.
81. **Programming cycle shifts.** SAP approvals expanded across successive four-year programming cycles. During the IRM period (2016–2019), SAP finance totalled USD 105 million with a co-finance ratio of 0.35. During GCF-1 (2020–2023), SAP approvals rose to USD 249 million with a co-finance ratio of 0.73. During GCF-2 (2024–2027), USD 305 million has been approved, with the ratio easing slightly to 0.61. This pattern reflects both growth in scale and some fluctuation in co-finance mobilization.
82. **Sectoral and public/private profile.** Adaptation dominates the SAP portfolio, accounting for 73 per cent of approved funding (USD 483 million), followed by cross-cutting projects (20 per cent) and mitigation (7 per cent). Public sector projects represent 87 per cent of approvals, with private sector operations comprising the remainder.[40]
83. **Just over half of approved SAP finance is through IAEs**. While the SAP's design sought to expand DAE participation, IAEs hold a slight majority of approved funding of USD 350 million versus USD 309 million for DAEs, indicating that the intended shift towards direct access remains incomplete.
84. **The regional distribution of SAP projects favours Africa and Asia-Pacific**. Africa (USD 255 million) and Asia-Pacific (USD 247 million) account for the largest shares of SAP finance, followed by Eastern Europe and Central Asia (USD 79 million) and Latin America and the Caribbean (USD 78 million). Most SAP finance is provided as grants (USD 580 million), with smaller amounts in equity (USD 40 million), senior loans (USD 17 million), guarantees (USD 9 million), subordinated loans (USD 8 million) and reimbursable grants (USD 5 million). In grant-equivalent terms, the contribution of non-grant instruments is substantially lower.[41] [42]
85. **Targeting vulnerable countries.** Vulnerable country groupings, including SIDS, LDCs and African States,[43] collectively received 68.5 per cent of SAP finance. In nominal terms, Board approvals included USD 323 million for LDCs (22 projects), USD 255 million for African States (20 projects) and USD 117 million for SIDS (10 projects). Non-vulnerable countries accounted for USD 227 million.
86. **Results area concentration.** Over two-thirds of SAP finance is concentrated in two adaptation results areas: "Livelihoods of people and communities" (USD 253 million) and "Health, food and water security" (USD 189 million). The remaining adaptation results areas, "Ecosystems and ecosystem services" (USD 80 million) and "Infrastructure and built environment" (USD 39 million), each received more finance than the four mitigation results areas combined (USD 99 million).
87. **Almost three-quarters of SAP projects are under implementation**. At the February 2025 cut-off, only four SAP projects had been fully disbursed, 35 were under implementation, and 10 were awaiting completion of legal arrangements under the Funded Activity Agreement (FAA).

[40] The survey was sent to all accredited entities as of B.41, including direct national, direct regional and IAEs. The survey was sent on 25 February, with a closing date of 5 March. The survey generated 30 responses
[41] Since 2018 grant equivalence has been used for official development assistance (ODA) such as those tracked through the OECD's Development Assistance Committee (OECD-DAC). The measure aims to facilitate the comparison of financial instruments, such as grants, loans, equity stakes and guarantees
[42] See GCF/B.37/22 for the GCF-2 programming cycle
[43] These groupings are not mutually exclusive – neither the amounts of nominal finance nor project counts sum to the total SAP portfolio

88. **Less than one-quarter of approved SAP project finance has been disbursed to AEs, and less than 7 per cent has been spent by AEs**. Of the total USD 659 million, only USD 159.7 million has been disbursed to AEs, amounting to only 24.2 per cent of the total. Further, only USD 45.7 million of the disbursed amount has been spent by AEs, amounting to only 7 per cent of the total SAP finance.[44]
89. **The current SAP portfolio, when assessed against its foundational targeting criteria, reveals only partial alignment between design intent and implementation.** While 68.5 per cent of SAP finance has been directed to particularly vulnerable countries, IAEs account for a slightly larger funding share of USD 350 million compared with USD 309 million for DAEs, as shown in Figure 5: SAP funding distribution by accredited entity type. The Category C ESSs restriction has also shaped project selection, limiting the range of interventions eligible under the modality.[45] These patterns point to a trade-off between maintaining simplified risk requirements and maximizing the scope of climate interventions, raising questions about who ultimately benefits from SAP financing.

Figure 5: SAP funding distribution by accredited entity type



Source: Data source and reference date: iPMS data via semantic model as at B.41, n =49.

90. **The SAP achieves mixed results on its core targeting objectives.** While vulnerable countries, including LDCs, SIDS, and African States, receive 68.5 per cent of financing, IAEs account for USD 350 million compared to USD 309 million for DAEs, falling short of the 50 per cent DAE allocation target.
91. **Strong alignment with the modality's foundational targeting.** The regional distribution of SAP financing shows strong alignment with the modality's vulnerability-focused objectives. LDCs have received the largest share (USD 323 million), followed by African States (USD 255 million), with significant overlap between these categories. Together, these priority groups account for USD 578 million – 88 per cent of total SAP financing – exceeding initial expectations for targeted support. SIDS have received a smaller absolute amount (USD 117 million), which reflects their smaller project scale rather than a lack of prioritization. This pattern indicates that, despite other operational

[44] Calculated on the basis of Annual Performance Reports for cycle 2023
[45] Based on KIIs. Several Accredited Entities reported that projects with Category B characteristics were adapted or "bent" to fit SAP's Category C restriction (AE-12, AE-31, AE-34, AE-41)

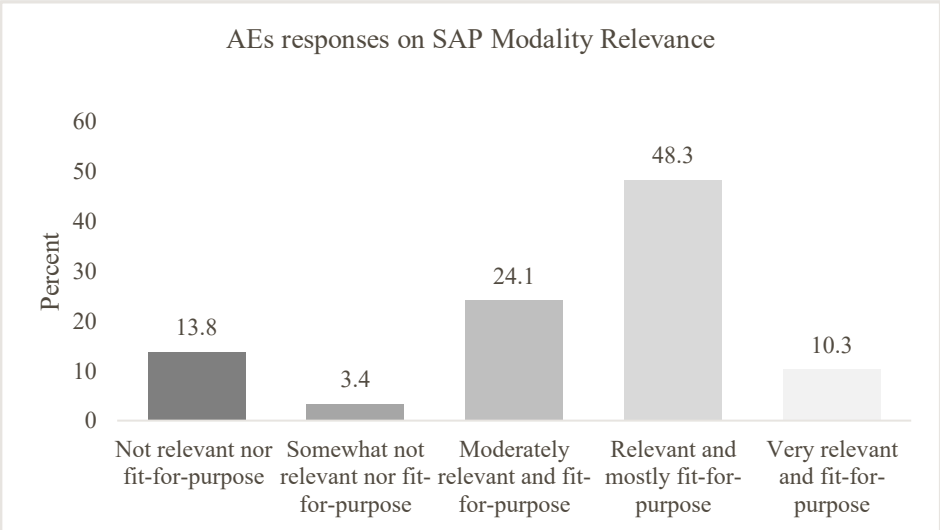
challenges documented in this evaluation, the SAP has directed resources broadly in line with its original targeting logic.

92. The SAP is generally seen as a valuable and suitable mechanism to quickly address the urgent investment needs of developing countries, particularly given its streamlined procedures aimed at faster responses. Stakeholders note significant interest from countries in project types that the SAP could ideally support – early warning or climate-smart food and livelihood security adaptation – suggesting alignment with country priorities. However, respondents also note that the Category C ESS restriction can limit project scope. In this respect, the ESS cap constrains SAP projects from fully addressing the breadth of urgent local needs.[46] Additionally, interview evidence indicates that the SAP's relevance and impact depend on the extent to which it enables genuine local engagement and rapid, context-sensitive solutions.

93. Interview respondents highlighted how the SAP modality has been an avenue for DAEs to learn about the GCF. Interviewees described the SAP as particularly valuable for DAEs seeking to gain experience with GCF processes before pursuing larger, higher-risk projects, depending on their accreditation status.[47] The modality was also viewed as relevant for entities in SIDS and LDCs with limited experience in managing substantial climate finance flows. In this way, the SAP - alongside the PPF - has provided a pathway to build familiarity with GCF terminology, requirements, and the broader climate finance landscape.

94. In the IEU survey of AEs,[48] 10.3 per cent of respondents rated the SAP as "very relevant" and fit-for-purpose" for meeting developing country needs. In comparison, 48.3 per cent considered it "relevant and mostly fit-for-purpose". A further 24.1 per cent viewed it as "moderately relevant and fit-for-purpose" (Figure 6).

Figure 6: Accredited entities' responses on SAP modality relevance and fit for developing countries

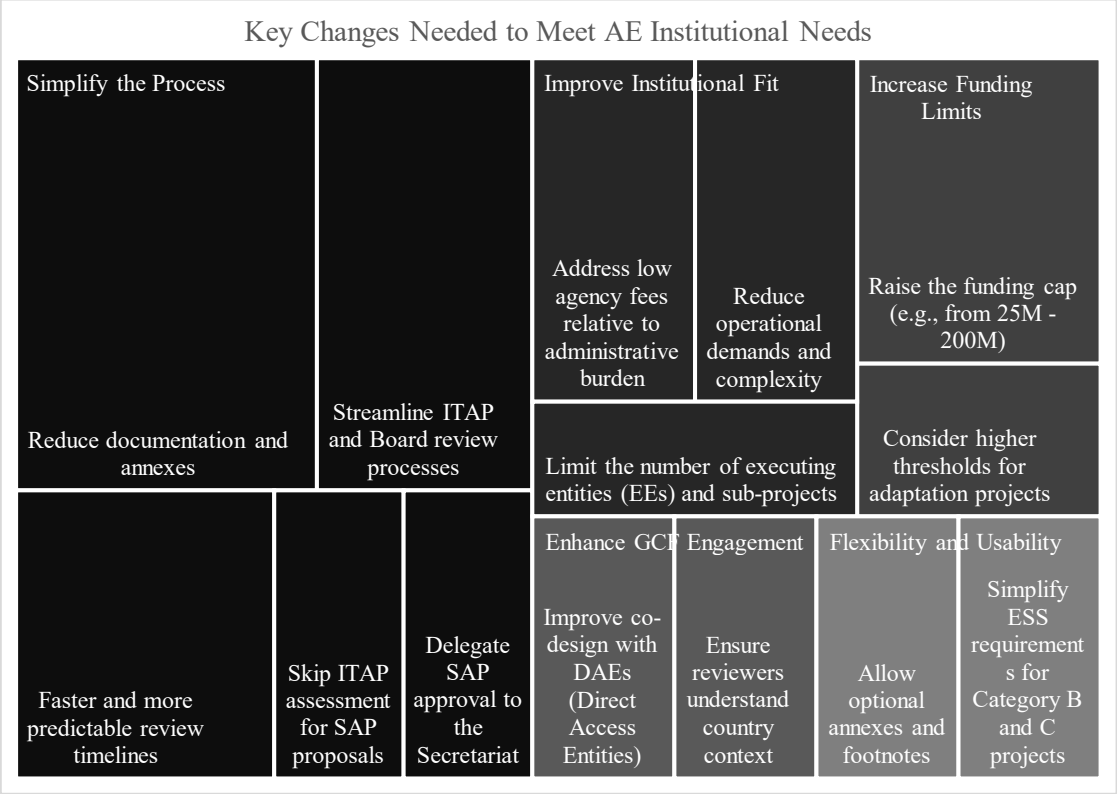


Source: IEU survey of AEs (n=30), percentages may not sum due to rounding.

[46] Based on KIIs. One AE noted that *"Cat C effectively limits implementation activities. You can't really do infrastructure or agriculture adaptation the way countries need"* (Code AE-2)
[47] Based on KIIs. Several respondents described SAP as a stepping stone for DAEs, offering confidence and an entry point to gain experience before pursuing larger, higher-risk projects (Codes DAE-8, SAP-9, SAP-20, Sec-35)
[48] The survey was sent to all accredited entities as of B.41, including direct national, direct regional and IAEs. The survey was sent on 25th February, with a closing date of 5th March. The survey generated 30 responses

95. AE respondents elaborated on the SAP's relevance across three themes (Figure 7). Challenges and limitations centred on procedural complexity, delays in processing, and limited applicability in some contexts. Strengths included perceived simplification, efficiency, and suitability for developing country needs. Opportunities for improvement focused on streamlining processes, reducing documentation, and improving clarity and communication.
96. **Reduce documentation demands and streamline review processes.** AE respondents proposed changes to better meet institutional needs, prioritizing reductions in documentation and review burdens, including streamlined iTAP and Board assessments for SAP proposals. They also called for addressing low AE fee rates, reducing operational complexity, and increasing funding limits. Additional suggestions included greater GCF engagement, improved co-design with DAEs, delegated approval authority, and more flexible documentation and safeguard requirements.

Figure 7: Accredited entities' comments on the relevance of the SAP modality



Source: IEU survey of AEs (n=30)

C. Capacity-Strengthening Contribution

97. **The modality's capacity-strengthening function, while unintended, has become its most recognized value proposition. DAEs explicitly cite the SAP's "psychological" confidence-building effects and experiential learning opportunities as key benefits, creating strategic tensions with the Fund's operational efficiency goals.**
98. The SAP demonstrates significant value as an institutional capacity development mechanism, creating a stepwise progression path for DAEs. The SAP has become an entry point for DAEs to gain experience with GCF processes and progressively manage larger, more complex projects. Stakeholders described a "step-by-step" progression, moving from USD 10 million to USD 25

million SAP projects before advancing to larger PAP projects. Secretariat respondents stressed that absorptive capacity must be deliberately built, and that co-design with AEs yields more effective implementation than consultant-driven proposals.[49] Several noted that the SAP has been especially valuable for DAEs in SIDS and LDCs with untapped potential, though results from proposals prepared through RPSP consultants have been mixed.[50]

99. The SAP has effectively engaged experienced DAEs, strengthening local ownership and local capacity development. In Bangladesh, SAP008, implemented by the Palli Karma-Sahayak Foundation (PKSF), was built on a similar World Bank–funded initiative to reduce flood vulnerability through homestead elevation and climate-resilient agriculture, reaching nearly 90,000 direct and 100,000 indirect beneficiaries.[51] PKSF has since secured SAP047 and FP206, built on a similar design. In Mexico, SAP023, implemented by Fondo Mexicano para la Conservación de la Naturaleza (FMCN), drew on a prior GEF–World Bank project to restore riparian ecosystems, exceeding midterm restoration targets and serving as FMCN's first GCF engagement. Some of the same lessons about engaging with the GCF were applied to SAP049, according to a key informant.[52] These cases illustrate the SAP's role in enabling DAEs to use prior experience, deliver results, and build confidence to pursue future projects. However, this unintended evolution towards capacity strengthening creates tensions with GCF's broader operational framework.

100. **Yet GCF operational procedures and implementation practices actively undermine strategic coherence by failing to align with strategic goals for predictability, simplicity, speed and direct access.** Key informants noted that GCF's operational procedures often undermine the SAP's goals of predictability, simplicity, speed, and direct access. Additional requirements introduced during implementation, inconsistencies in RPSP processes, and ad hoc procedural demands were cited as slowing approvals and creating uncertainty.[53] Secretariat stakeholders confirmed that these practices diverge from the SAP's original streamlined vision and from GCF-2 priorities to improve operational simplicity and predictability in support of country-led initiatives and direct access.

101. Although SAP projects can generate approaches with potential for wider replication, the GCF has not established clear frameworks or agreed procedures for scaling them. Interviewees pointed to the lack of standard protocols for collaboration with other climate funds, such as the AF, and to limited guidance on linking successful SAP interventions with larger follow-on investments.[54] The 2020 IEU evaluation also found that the SAP's early trajectory diverged from its founding objectives, underscoring systemic constraints to its relevance and internal coherence.

102. Despite scepticism about the SAP's direct transformative climate impacts, stakeholders identify substantial value in its institutional development function. DAEs described it as providing a

[49] KII responses. Secretariat and AE respondents emphasized that absorptive capacity is strengthened when proposals are co-designed: *"Co-creation of project, from idea to final proposal, made a huge difference – more effective than consultant-written submissions"* (DAE-27). See also (AE-38 and SAP-6)
[50] Based on KIIs. Secretariat respondents noted that "*Many Readiness proposals were not connected to subsequent SAPs or pipelines; consultant-driven applications often lacked follow-through"* (Sec-65). Others observed that when SAPs were written by consultants, *"implementation suffers – ownership and capacity don't transfer to the AE"* (Sec-229)
[51] Evaluation team analysis, based on case study of SAP023, *Conserving Biodiversity and Restoring Ecosystem Services in Riparian and Aquatic Areas in Mexico*, implemented by Fondo Mexicano para la Conservación de la Naturaleza (FMCN). See Volume II, Annex 9
[52] Key informant interviews where a DAE respondent noted that *"SAP as a modality has an impact on AE confidence ("psychological") learning from first SAP led to a second SAP experience, now a PAP in the pipeline. Little by little, $10M > $25M > $50M (PAP)"* (DAE-21)
[53] Based on KIIs. Respondents noted that operational procedures undermined SAP's goals: *"Because of GCF unpredictability UNDP 'over-prepares' – the process becomes heavier than needed"* (AE-9); *"Appraisal manual became the SAP manual. If anything, procedures multiplied rather than simplified"* (SAP-22). See also AE-15, SAP-24, Sec-149
[54] Based on KIIs. Respondents noted the lack of clear frameworks for scaling SAP interventions: *"No SOP with the Adaptation Fund yet on a scale-up pathway"* (Sec-90); *"Scaling Up Framework with Adaptation Fund – SAP never fully connected to it"* (SAP-43). See also SAP-18, SAP-50, Sec-102, Sec-216

"psychological" confidence boost and practical experience that helped them move from smaller to more complex initiatives. This learning-by-doing effect was seen as especially important for entities new to international climate finance, enabling them to develop systems, procedures, and networks for future access, potentially through the PAP.[55]

103. This shift in how the SAP's value is perceived, from a focus on direct transformational impact to institutional readiness, reinforces the chapter's finding that the modality's role has evolved beyond its original intent but remains strategically relevant for broadening access to climate finance.

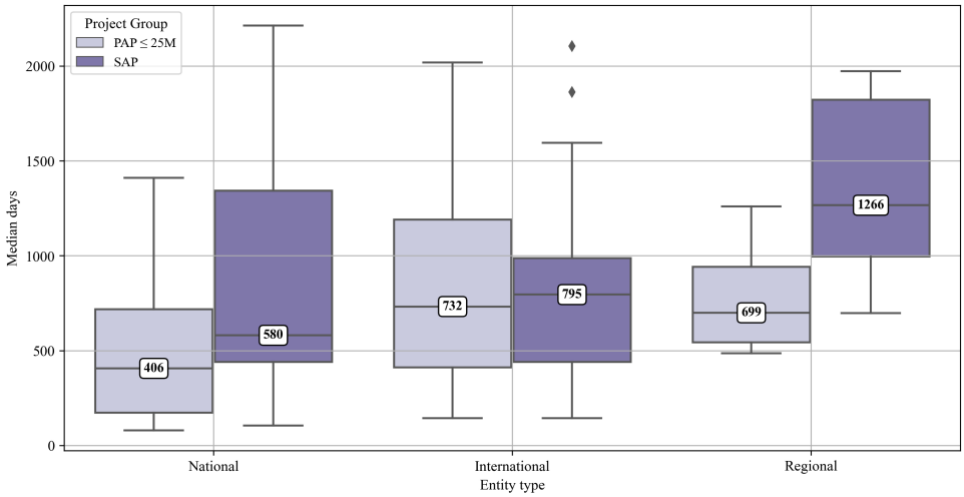
D. Understanding the Drivers

1) International Accredited Entity versus Direct Access Entity Performance: Trade-offs and implications

104. For the SAP and similarly sized PAP projects, median project development timeframes are the shortest for national DAEs. Figure 8 illustrates how national DAEs demonstrate the shortest approval times for SAP projects at 580 days, but regional DAEs show the longest processing times at 1,266 days.[56] These figures contrast with equivalent PAP projects, where national DAEs complete the process in 406 days and regional DAEs in 699 days, suggesting particular challenges for regional approaches within the SAP.[57] This is considerably longer than equivalent PAP projects, which show a median figure of only 406 days. In contrast, regional DAEs show the longest project timeframe for SAP projects at 1,266 days, almost double the 699 days it takes for an equivalent PAP proposal, suggesting potential challenges in regional project development processes for SAP projects across countries. IAEs illustrate a broadly similar project development median timestamp for SAP and PAP projects at 795 and 732 days, respectively. It is important to note that most approved SAP finance is through IAEs and not national DAEs, helping to explain some of the challenges associated with the SAP access modality during the CN stage.

[55] Based on KIIs. One respondent described SAP as a *"stepping stone approach"* that gave DAEs confidence and practical experience (SAP-20). See also DAE-8 and SAP-9
[56] National DAE project development timelines show significant variation, as evidenced by the wide spread of the boxplot, which indicates the range of values. See figure 8 below
[57] National DAE project development timelines show significant variation, as evidenced by the wide spread of the boxplot, which indicates the range of values. See figure 8 below

Figure 8: Project Development Timeframe from CN submission to FP approval by Entity Type



Source: iPMS data via semantic model as at B.41 (20 Feb 2025).

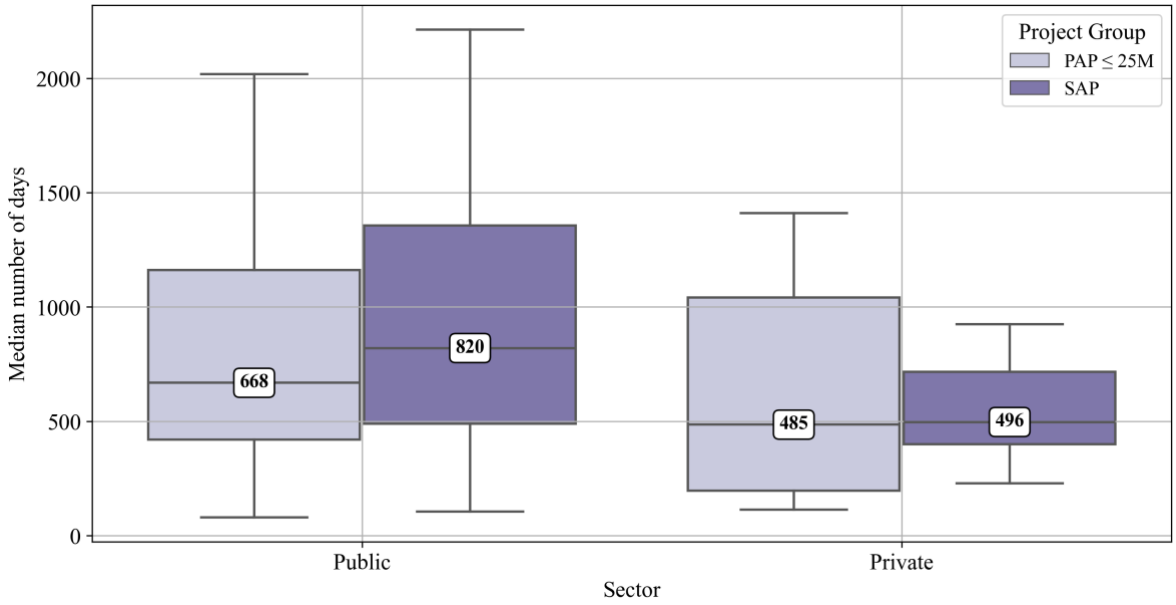
Note: The analysis includes 40 PAP ≤ 25M projects and 26 SAP projects implemented by international entities; 8 PAP ≤ 25M projects and 16 SAP projects by national entities; and 4 PAP ≤ 25M projects and 7 SAP projects by regional entities.

105. Timestamp differences between entity types using mean values show regional DAEs to be particularly speedy post FP approval. Figure 8 illustrates how the average FP timestamps for SAP and similarly sized PAP projects by entity type show broadly similar mean values for FP received to FP approved and for the time taken from FP received to first disbursement. Regional DAEs show a considerably shorter timestamp from FP approval to FAA execution, just 80 days, as well as from FP approval to FAA effectiveness. Yet none of these differences are statistically significant.

2) Public versus. Private Implementation Differences

106. **Across both SAP and comparable PAP projects, private sector projects are processed faster than public sector projects from CN received to FP approval.** Figure 9 compares median figures for project development timestamps comparing SAP projects against PAP projects, which are smaller than USD 25 million. Figure 9 illustrates that at 820 days, public sector SAP projects take a longer time from CN to the approval of funding proposals than equivalent PAP projects. As seen above, 87.5 per cent of all SAP project finance has been approved for public sector projects. In contrast, the limited number of private sector SAP projects demonstrates a broadly similar and slightly more predictable approval process than the private PAP projects under USD 25 million.

Figure 9: Project development Timeframe from CN submission to FP approval by Sector



Source: iPMS data via semantic model as at B.41 (20 Feb 2025).

Note: For the private sector, the analysis includes nine projects under PAP ≤ 25M and six projects under SAP, while in the public sector, it covers 43 projects under PAP ≤ 25M and 43 projects under SAP.

107. In contrast, public sector SAP projects show much faster timestamps from FP approval to FAA execution and effectiveness compared to equivalent PAP projects. Table 5 presents FP timestamp mean values and analyses of variance (ANOVAs) for public sector projects comparing SAP projects with PAP projects under USD 25 million.[58] It shows that for public sector projects, the SAP modality has slightly shorter timestamps for FP received to FP approved and for FP received to first disbursement, although these differences are not statistically significant. In contrast, the much faster process from FP approval to FAA execution,142 days, and FAA effectiveness, 293 days, is significantly quicker at the 1 per cent and 5 per cent levels, respectively, compared with the PAP portfolio. Analyses of covariance (ANCOVAs), which included AE type and thematic type, did not change the significance levels. Comparisons for private sector projects across SAP and PAP projects under USD 25 million did not show any significance, mainly due to the limited sample size for private sector SAP projects.

Table 5: ANOVA of Project Development Timeframe Comparing Public Sector SAP and PAP Projects

Timestamp / PAP bandwidths and SAP		N	Mean	Std. Deviation	F Between Groups	Sig.
FP received to FP approved	PAP < USD 25 million	64	476.08	466.04	.084	.772
	SAP	43	449.81	448.70		
	PAP < USD 25 million	64	325.53	334.23	9.139	.003

[58] Evaluation team analysis of iPMS data, based on ANOVA and ANCOVA results. See SAP2025 Evaluation, Volume II, Annex 5 (*Imputation Methodology for Regression Framework*) and Annex 6 (*Alternative Identification Strategies and Limitations*)

Timestamp / PAP bandwidths and SAP		N	Mean	Std. Deviation	F Between groups	Sig.
FP approval to FA executed	SAP	37	142.00	205.27		
FP approval to FA effective	PAP < USD 25 million	62	451.06	358.46	5.500	.021
	SAP	36	293.06	244.22		
FP received to first disbursement	PAP < USD 25 million	59	1036.66	578.30	2.310	.132
	SAP	32	853.03	493.82		

Source: iPMS data via semantic model as at B.41, (20 Feb 2025). The IEU team compared projects from both the PAP and SAP portfolios with similar characteristics.

108. **While observing faster review processes, the limitations of the SAP in streamlining and speeding up the effective programming of climate projects are most evident from a private sector perspective.** Respondents noted that the modality has a limited fit with private sector project development, where actors require greater speed, fewer and more targeted annexes, greater flexibility, a shortened process and, ideally, standardized term sheets.[59] The higher SAP ceiling of USD25 million has generated interest from private entities, but the design is poorly suited to their needs.[60]

109. While the SAP could work for loan projects with established banks, it is far less suited to equity stakes in climate funds investing in innovative solutions in-country. Legal negotiations for completing the FAA are substantial, covering incorporation, GCF's legal position, first-loss modalities and shareholder agreements, all requiring substantial due diligence. The complexity increases with the number and type of financial partners and jurisdictions involved. These transaction costs require economies of scale, making them unsuitable for SAP's relatively small size. In complex financing situations with multiple funders, the legal and jurisdictional complexity leaves the private sector facility (PSF) inappropriate.

3) Adaptation versus Mitigation versus Cross-cutting Performance

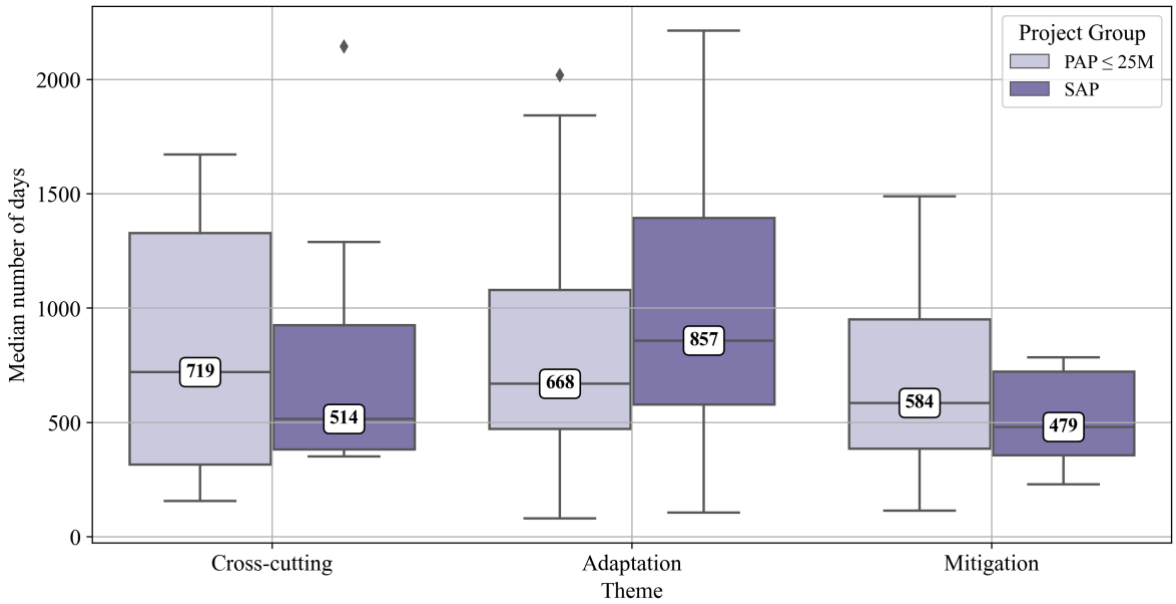
110. Mitigation and cross-cutting SAP projects show shorter and less variable overall project development timestamps in terms of median values than equivalent PAP projects. Based on a small sample size, mitigation SAP projects show a reduction in the time spent in project development compared to equivalent PAP projects, with timestamps showing reductions of 105 and 205 days, respectively. (See Figure 10) However, over 73.5 per cent of approved SAP funding, USD 483 million, is allocated to adaptation projects, which show the lengthiest project development timestamps at 857 days, helping to explain the delays in project development in the CN stage associated with the SAP modality. Timestamp differences using mean values between thematic

[59] Based on KIIs. Respondents noted SAP's limited fit with private sector project development. One explained that SAP is *"not as client-oriented during implementation. Private sector partners need targeted annexes and streamlined processes"* (DAE-20). Others emphasized the need for faster and more flexible instruments (AE-18). See also DAE-29 and DAE-30

[60] Respondents noted that the increase to USD 25 million made SAP more attractive overall, but did not materially shift private sector interest*: "Material change after uplift to USD25 million, but mostly for DAEs. Private sector still does not see it as fitting their needs"* (Sec-125). See also AE-1, AE-7, SAP-21 and Sec-190

areas show SAP adaptation projects are significantly faster from FP approval to FAA execution and to FAA effectiveness compared to equivalent PAP projects. In addition, SAP cross-cutting projects are significantly faster from FP received to first disbursement compared to similarly-sized PAP projects, despite a small sample size.

Figure 10: Project Development Timeframe from CN submission to FP approval by Thematic Area



Source: iPMS data via semantic model as at B.41 (20 Feb 2025).

Note: the analysis includes 29 PAP ≤ 25M projects and 35 SAP projects under Adaptation; 11 PAP ≤ 25M projects and 9 SAP projects under Cross-cutting; and 12 PAP ≤ 25M projects and 5 SAP projects under Mitigation.

4) Cross-cutting Institutional Bottlenecks

111. **Stakeholders across the SAP portfolio consistently identify institutional and procedural barriers that systematically undermine the modality's efficiency and effectiveness, particularly given that many entities, especially those in contexts requiring urgent climate responses, cannot sustain multi-year approval processes.** While effective Secretariat support emerges as critical for successful SAP implementation, with proactive assistance, technical guidance, and "sparring partner" relationships significantly enhancing the ability of entities to navigate the process, these benefits are systematically undermined by frequent staff turnover. Analysis of stakeholder feedback reveals three primary institutional bottlenecks that drive implementation delays and compromise the SAP's value proposition.

112. First, regular changeover of SAP project focal points has made establishing a consistent modus operandi extremely difficult, preventing the crystallization of streamlined processes that differentiate the SAP from the PAP, with AEs expressing particular frustration at having to rebuild relationships and re-explain project contexts with each staff change.

113. Second, the review process, encompassing both Secretariat divisions and iTAP procedures, generates excessive administrative burden through inconsistent feedback and duplicative comments.

114. Third, rigid post-approval procedures create limited credibility and implementation frustrations. Entities report protracted negotiations for minor restructuring, shifting procedural expectations, and delays in disbursement that undermine confidence in the SAP's predictability compared to other climate funds. These systemic challenges not only limit the SAP's practical utility but also actively discourage its use among entities that initially viewed it as a time-saving opportunity, undermining the modality's foundational purpose of simplifying access to climate finance.[61]

115. In practice, the SAP has been used to pilot adjustments aimed at shortening GCF's review process, both before and after the B.32 decision. Respondents described it as a "guinea pig for new approaches," citing refinements such as simplified templates, a truncated review toolkit, and fewer questions. Many of these changes were subsequently adopted by the PAP process, reducing the distinction between the two modalities.[62]

116. Effective Secretariat support is critical for successful SAP implementation, with proactive assistance, technical guidance, and "sparring partner" relationships significantly enhancing entities' ability to navigate the process. Frequent Secretariat staff turnover disrupts continuity and prevents the crystallization of streamlined processes. AEs must repeatedly rebuild relationships and re-explain project contexts with each staff change, creating inefficiencies that contradict the SAP's simplification objectives.[63]

117. **High transaction costs and excessive review burdens significantly undermine the SAP's efficiency, placing unsustainable burdens on the human resources of both entities and Secretariat staff.** Key informants from both parties reported that SAP reviews demand extensive personnel time, with some proposals receiving 100–150 comments in a single round and repeated queries across multiple rounds.[64] The absence of a fast-track mindset means reviews can have over a dozen iterations, forcing entities to commit substantial staff time to revisions. At the same time, the Secretariat manages equally resource-intensive reviews. Several AEs noted that projects at the original USD 10 million ceiling were "not worth it" given the preparation effort required.[65]

118. Reported costs to reach Board approval were as high as USD 750,000, or three to 10 times higher than for comparable projects under the AF or GEF, with USD 150,000–200,000 often spent in the design phase alone. These costs reflect unpredictable review requirements, leading AEs to over-prepare and rely heavily on consultants for assessments, climate justifications, or legal inputs. This misalignment between the SAP's streamlined intent and its resource-intensive reality diverts skilled staff from implementation to prolonged administration, discourages smaller, locally led projects, and contributes to staff turnover within AEs, eroding institutional memory for delivery and reporting.

[61] Based on KIIs. Respondents noted that *"the GCF system post-approval has little room for flexibility. A course correction from 2022 is still not finalized… the FAA term sheet locks a project in with little space for adaptive management."* Others emphasized that *"in implementation it is very hard to course correct, and restructuring negotiations can stretch over years"*

[62] An example from an accredited entity outlined how it took over one year to get a PPF in place: the concept note was delivered in June 2021, the UNOPS PPF agreement was only completed in September 2022. The Board package itself was developed from October 2022 through to July 2024 for a Board meeting in early 2025. The accredited entity recounted how this was considered a 'fast' SAP process

[63] Based on KIIs. Respondents noted inefficiencies from Secretariat staff turnover and shifting focal points: *"Secretariat would tend to send the proposal reviewer comments again to different divisions … so you had to deal with new people each time"* (SAP-38); *"Different focal points within GCF have caused us challenges"* (AE-18). See also Sec-16

[64] Based on KIIs. Respondents described SAP reviews as excessively demanding: *"Can be 3 rounds of comments, sometimes 4, as many as 150 comments"* (AE-10); *"We had three different rounds of comments – and many of them repeated"* (AE-22). See also Codes AE-16, AE-65 and Sec-20

[65] Based on KIIs. Respondents described high transaction costs as undermining efficiency at the original USD 10 million ceiling: *"$10 mil were 'not worth it'. Considerable work for little return"* (AE-46); See also AE-1, AE-4 and AE-42

119. A notable perception gap exists between the SAP's stated ambition and stakeholders' assessment of its transformative potential. Several key informants described claims of SAP projects being "transformative" as unrealistic given their smaller scale, Category C restrictions, and funding limits.[66] Stakeholders questioned what the paradigm-shift criteria meant, particularly expectations for regional impact from a single project. While PAP projects face similar challenges, their larger budgets and broader environmental and social scope offer a more plausible pathway to such outcomes.

120. **The ESS Category C restriction is widely seen as a major constraint on the SAP's scope and accessibility.** Decision B.32/05 reconfirmed that the SAP would only include projects with minimal to no potential adverse environmental or social impacts, as defined in the GCF Revised Environmental and Social Policy.[67] This limits eligible activities and diverts many smaller-scale adaptation projects into the more complex PAP. Secretariat respondents noted that reviews focus sharply on avoiding displacement, resettlement, significant construction, or impacts on Indigenous Peoples, and on ensuring strong AE capacity to manage risks. ESS specialists now engage earlier with AEs to explain compliance requirements, but many stakeholders still view the restriction as overly risk averse.

121. The Category C ESSs restriction constitutes a significant implementation barrier. Key informants report that this limitation severely narrows the eligible activities, forcing many suitable smaller-scale adaptation projects into the more complex PAP process and undermining accessibility objectives. There is evidence of AEs shoehorning Category B projects into Category C. Respondents noted cases where AEs submitted small-scale agricultural adaptation projects involving some physical infrastructure as SAP proposals, even when their potential impacts placed them in ESS Category B. The "simplified" label was seen as attractive, but AEs often underestimated the implications for safeguards. Secretariat respondents indicated that shortening the CN stage under the SAP has increased the frequency of such cases, with Category B elements sometimes only becoming evident at the full proposal stage. This has required ESS specialists to take a cautious approach, ensuring projects meet the Category C threshold. While some stakeholders view this as necessary due diligence to uphold the SAP criteria and safeguard public funds, others see it as evidence that the SAP's parameters and requirements are not always communicated in a clear or easily usable format.

122. Review processes generate excessive administrative burden through inconsistent feedback and duplicative comments. Despite the truncation of the iTAP process, entities report up to a dozen comment rounds with recurring questions. At the same time, reviewers lack a 'fast-track' mentality and also demonstrate limited experience in developing countries. GCF's incentive structure compels reviewers to generate excessively long observations over multiple rounds of comments, with recurring questions and inconsistent feedback forcing AEs to over-prepare and over-invest in design.[68] The problem extends to iTAP reviews, where, despite truncation to two reviewers,

[66] Based on KIIs. One respondent described the idea of SAP projects being transformative as a *"fantasy story"* given their scale and restrictions (ITAP-13)

[67] The Secretariat assesses compliance with the GCF environmental and social safeguards, Revised Environmental and Social Policy, Updated Gender Policy, Indigenous Peoples Policy, financial policies and broader policies adopted by the Board, including activity-specific criteria

[68] Based on KIIs. Respondents emphasized the burdens of repeated, inconsistent review cycles: *"Can be 3 rounds of comments, sometimes 4, as many as 150 comments"* (AE-10); *"We had three different rounds of comments – and many of them repeated"* (AE-22). Others noted that *"Secretariat has no incentive to say that a proposal is simple"* (SAP-1) and that *"KPIs on how many comments you have written… makes the process longer"* (Sec-119). See also AE-9, DAE-13, Sec-18

respondents report last-minute, ad hoc requests not aligned with government metrics, triggering avoidable negotiations with ministries.[69]

123. Reviewers were also described as having limited developing country experience, producing low-quality and trivial comments that reflect an "ivory tower" approach disconnected from ground realities.[70] Project focal points lack responsibility for consolidating comments across divisions or resolving contradictions, leaving AEs with a fragmented review experience that undermines the simplifications that the SAP was meant to introduce, and which were subsequently extended to the PAP.

124. **Rigid post-approval procedures and a lack of consistency undermine credibility.** AEs expressed common frustration with the lack of adaptability once projects enter implementation. Respondents noted that relatively minor restructuring often becomes bogged down in protracted negotiations with the Secretariat, despite governments being ready to proceed.

125. Delays in disbursement and shifting procedural expectations, which AEs said often depended on the individual reviewer within the Secretariat, were also cited as obstacles. Respondents contrasted GEF's more predictable, "no-surprises" process following PIF approval - where preparation resources are provided - with GCF's less predictable review cycle.[71]

[69] Based on KIIs. Despite SAP's shift to two iTAP reviewers (ITAP-3; Sec-116; Sec-182), respondents reported misaligned and repetitive requests: *"Obvious that iTAP reviewers do not see the IDR, where answers to already answered questions have to be answered again"* (AE-69); *"Now facing requests for proposal elements that are not in the GCF guidance, for example one week before iTAP review asked for a spreadsheet calculating beneficiaries"* (DAE-12)

[70] Based on KIIs. Respondents criticized the quality and relevance of some review comments: *"Some of the comments good, but others were trivial and low quality. One very lengthy comment was more a statement, like an academic dissertation"* (AE-23). Another described reviewers as having an *"ivory tower complex"* disconnected from real-world contexts (Sec-25)

[71] Based on KIIs: "*Comparable to GEF-LDCF which is a far simpler process. Once PIF approved, resources are provided for preparation*" (E-13); "*GEF a 'well oiled' system in comparison with GCF, with clear expectations and consistent, 'no surprises' processes*" (AE-14)

IV. PERFORMANCE AND DELIVERY OF THE SAP

126. This chapter evaluates whether the SAP delivers on its promise of providing a simpler and faster route to climate finance. It combines both iPMS timestamp data and survey and interview evidence to assess approval speed and resource delivery. The analysis has three parts. First, the evolution of approval time frames across programming cycles and the counter-intuitive impact of decision B.32/05 reforms. Second, the critical gap between Board approval and actual resource flows, revealing that only 24 per cent of approved funds have been disbursed, and merely 7 per cent have been spent by AEs. Third, the key drivers of these implementation challenges, including entity type performance patterns, sector dynamics, and institutional bottlenecks that undermine the SAP's efficiency objectives.

KEY TAKEAWAYS

The SAP's promise of faster access has eroded. Processing times lengthened sharply across replenishment cycles, and reforms under decision B.32/05 slowed rather than streamlined approvals. While post-approval steps are faster than for equivalent PAP projects, only 24 per cent of funds have been disbursed and just 7 per cent spent, with wide variation across entity types and sectors. These persistent delivery gaps undermine credibility, leaving the SAP operationally indistinguishable from the PAP and raising questions of continued relevance.

127. The SAP approval process follows eight sequential stages: (1) **CN submission** by the accredited entity using simplified templates, (2) **CN review and feedback** from GCF Secretariat, (3) **FP development and submission** incorporating Secretariat comments, (4) **FP review** by Secretariat divisions and external firms, (5) **iTAP review** using streamlined procedures (2 reviewers vs. full panel), (6) **Board approval** during regular Board meetings, (7) **FAA negotiation and execution** between GCF and AE, and (8) **first disbursement** once FAA becomes effective and conditions precedent are met.

128. This evaluation analyzes timestamps across these stages, focusing on key transition points: CN submission to FP submission, CN submission to FP approval, FP approval to FAA execution, FAA execution to effectiveness, and FP approval to first disbursement. The analysis examines whether the SAP achieves faster processing compared to equivalent PAP projects while maintaining quality standards.

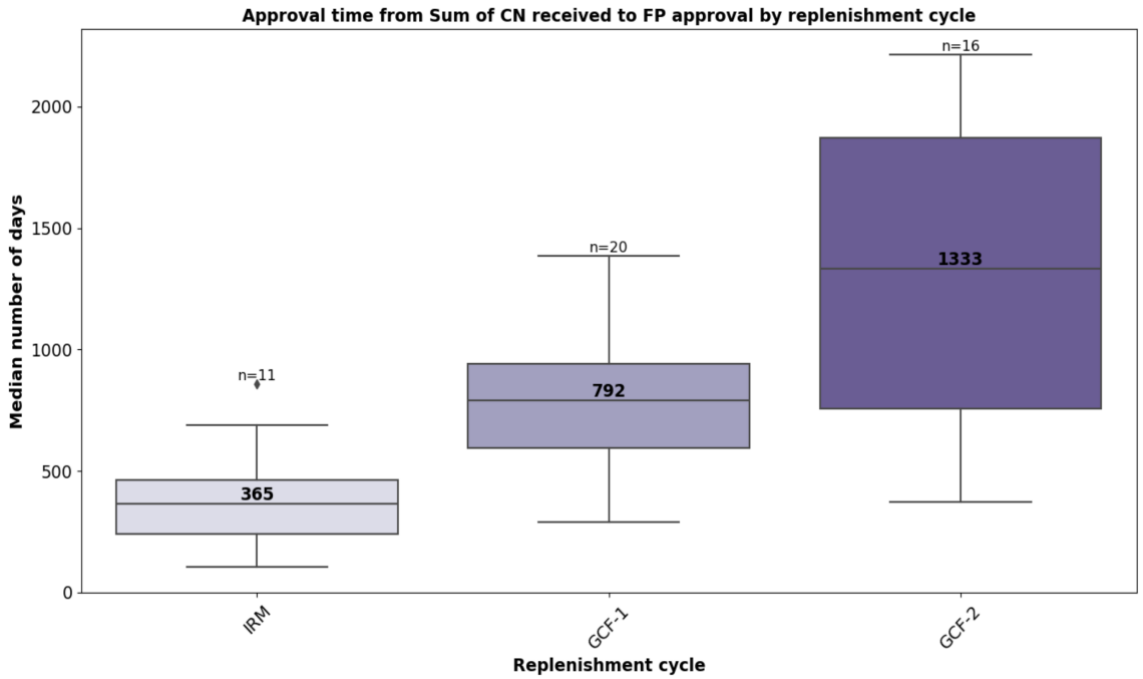
A. EVOLUTION OF THE APPROVAL DELAYS

129. The time from CN submission to FP approval for SAP projects has become lengthier over time, and especially in the GCF-2 programming period. Figure 11 shows the time taken from CN submission to FP approval in days across the different programming cycles (IRM, GCF-1, and GCF-2). It shows that the median time of 365 days in IRM has increased to 792 days in GCF-1, to over 1,333 days in GCF-2. The graphic shows an increasing level of variability over time. This could be due to a range

of factors, including growing complexity in project approvals, more rigorous due diligence, or administrative inefficiencies.[72]

130. **SAP processing times have increased sharply over successive replenishment cycles.** Median time from CN submission to FP approval grew from 365 days during IRM to 792 days in GCF-1 and to 1,333 days for GCF-2.

Figure 11: Duration from Submission of Concept Note to Funding Proposal Approval (by replenishment cycle)



Source: iPMS data via semantic model as at B.41 (20 Feb 2025). N = 49.

131. The increase in the time from CN submission to FP approval for SAP projects across the three replenishment cycles is significant and remains so when we control for key project characteristics (see Table 6). The mean values for the CN submission to FP approval timestamp increase from 493 in the IRM period, to 863 in the GCF-1 period, and to 1,304 in the GCF-2 period. The variance, as indicated by the standard deviation, remains relatively constant across the IRM and GCF-1 periods, before increasing markedly in the GCF-2 period. Using ANOVA across the three programming cycles, the increase in time from CN submission to FP approval is significant at the 0.05 per cent level. This remains true when controlling for key project characteristics, such as AE type, thematic type and public or private sector - in an analysis of covariance (ANCOVA).[73]

[72] The dates used are the original submission dates. The following outliers were removed using the IQR method: SAP009, SAP031. It is important to note that the overall dataset with PAP and SAP projects had 51 missing values for CN submission date

[73] As demonstrated in an analysis of covariance which controlled for AE category, thematic category and sectoral type (public / private). See SAP2025 Evaluation, Volume II, Annex 5 (Imputation Methodology for Regression Framework) and Annex 6 (Alternative Identification Strategies and Limitations)

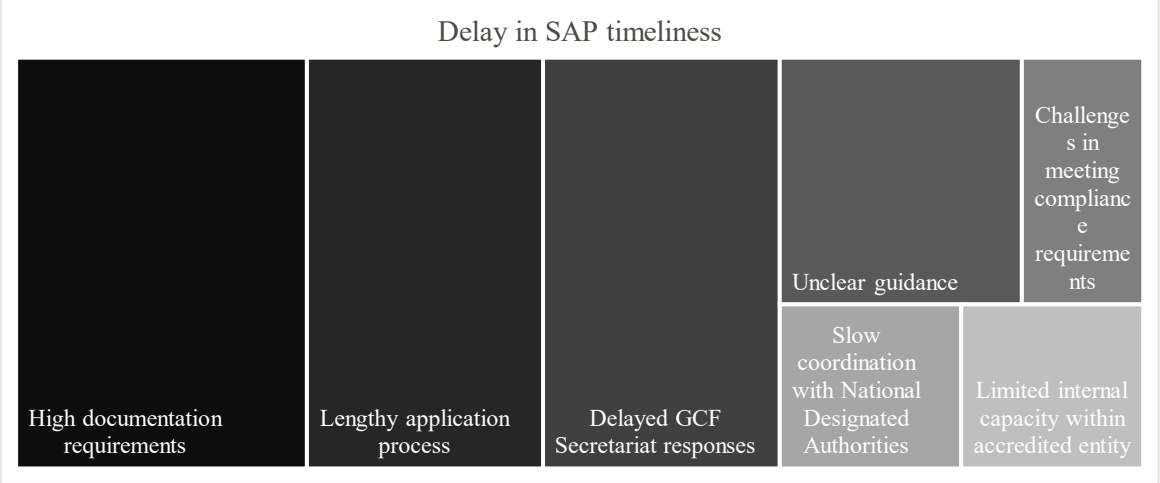
Table 6: Project Development Timestamps from CN submission to FP Approval by Programming Cycle: Analysis of Variance

PROJECT DEVELOPMENT TIMESTAMPS BY PROGRAMMING CYCLE – ANALYSIS OF VARIANCE					
	Sum of Squares	df	Mean Square	F	Sig.
Between Groups	4628166.498	2	2314083.249	9.514	<.001
Within Groups	11188422.604	46	243226.578		
Total	15816589.102	48			

Source: iPMS data via semantic model as at B.41 (20 Feb 2025).

132. The online survey of AEs asked about whether using the SAP had improved the timeliness of the project development and review cycle. Around one-third of respondents, 37.9 per cent, reported that the SAP has moderately improved the timeliness of the project development and review cycle. On the other hand, 27.6 per cent of AE respondents reported that there has been no improvement, and 24.1 per cent were unsure or did not know. The online survey included a skip pattern to ask only those AEs who felt that the SAP had not improved timeliness to identify reasons for any delay. Figure 12 illustrates that the eight AE respondents outlined how high documentation requirements, a lengthy application process, and delayed responses from the GCF Secretariat were the main challenges. Further issues reported were difficulties in meeting compliance requirements, limited internal capacity within AEs, and slow coordination with national designated authorities.

Figure 12: Delays in SAP Timelines



Source: IEU survey of AEs (n = 8)

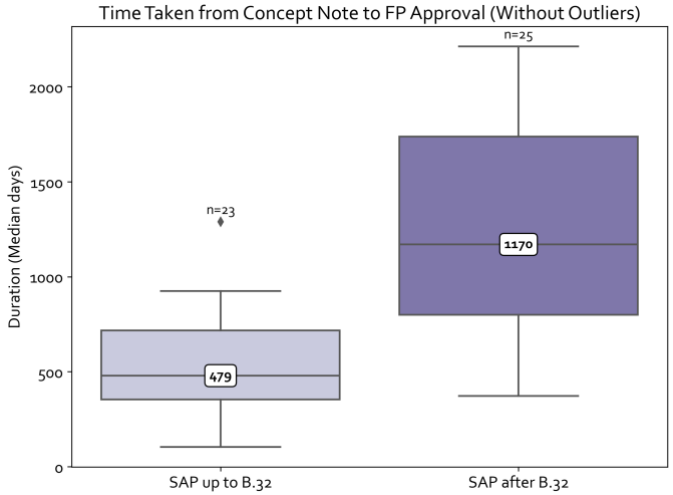
1) The B.32/05 Paradox: Reforms that Slowed Things Down

133. Despite the simplifications in the SAP modality since decision B.32/05, the SAP modality has not improved the speed of project development from CN submission to Board approval, with the duration worsening considerably. Figure 13 illustrates the median duration from CN submission to FP approval prior to B.32 was 479 days. SAP projects approved after B.32 have taken significantly longer to transition from CN submission to FP approval, with a median value of 1,170 days, and have experienced greater variability, as shown in Figure 9. The longer duration in the GCF-2 period is also reflected in the average (mean) figures, which show 589 days during GCF-1 increasing to

1,231 days during GCF-2. An ANOVA across the two periods is significant at the 1 per cent level, as is an ANCOVA that controls for key project characteristics, including AE type, thematic type and public or private sector.

134. **The B.32/05 reform package counterintuitively slowed down SAP processing despite simplification commitments.** Pre-B.32 median processing time was 479 days compared to 1,170 days post-B.32, representing a 144 per cent increase that undermines the rationale for the reform efforts.

Figure 13: Project Development Timestamps from CN to FP Approval Across SAP Modality Periods Before and After B.32



Source: iPMS data via semantic model as at B.41(20 Feb 2025), n=49.

Note: the analysis shows the timeframe from CN submission to FP approval for SAP projects before and after B.32. One outlier, SAP009, was removed.

135. Comparing the SAP before and after B.32 using mean values shows that performance worsened in the CN review stage, held steady during the FP review stage, and improved in the period from approval to FAA effectiveness. Table 7 presents descriptive statistics and ANOVAs for six timestamps before and after the B.32/05 decision. The analysis reveals a clear pattern: the early stages slowed significantly after the reforms, while the later stages improved. Specifically, the SAP timestamps from CN submission have become slower at a statistically significant 1 per cent level since B.32, indicating that CN development and initial review phases now take considerably longer. The FP review stage shows some slowing since B.32, but this change is not statistically significant, suggesting performance in the middle phases has been roughly stable. By contrast, Table 6 shows that post-approval phases are experiencing meaningful and statistically significant improvements, with the time from FP approval to FAA execution falling to just 17 days and FAA effectiveness improving to 160 days. The reduction in the period from FP received to first disbursement also suggests improvement, though this is not statistically significant. Importantly, ANCOVAs that control for key project characteristics, such as AE type, thematic type, and public or private sector status, do not affect these results, confirming that the observed patterns reflect genuine procedural changes rather than differences in project composition.[74]

[74] The public or private sector control variables shows significance at the 95 per cent level for the FAA executed and FAA effectiveness timestamps, suggesting private sector projects are faster in these post-approval stages

Table 7: ANOVAs of Project Development Timestamps Before and After B.32

ANOVAs OF PROJECT DEVELOPMENT TIMESTAMPS BEFORE AND AFTER B.32							
		N	Mean in days	Std. Deviation		F	Sig.
						Between groups	
CN to FP received	Before B.32	24	235.25	250.32		21.542	<.001****
	After B.32	25	722.16	451.50			
CN to FP approval	Before B.32	24	588.96	353.20		22.054	<.001***
	After B.32	25	1231.24	573.58			
FP received to FP approved	Before B.32	24	353.71	282.60		1.634	.207
	After B.32	25	509.08	527.06			
FP approval to FAA executed	Before B.32	24	303.50	300.98		15.966	<.001***
	After B.32	18	16.89	44.25			
FP approval to FAA effective	Before B.32	23	441.09	310.10		12.748	<.001***
	After B.32	17	159.53	110.20			
FP received to first disbursement	Before B.32	22	873.55	432.55		.149	.702
	After B.32	13	806.00	600.59			

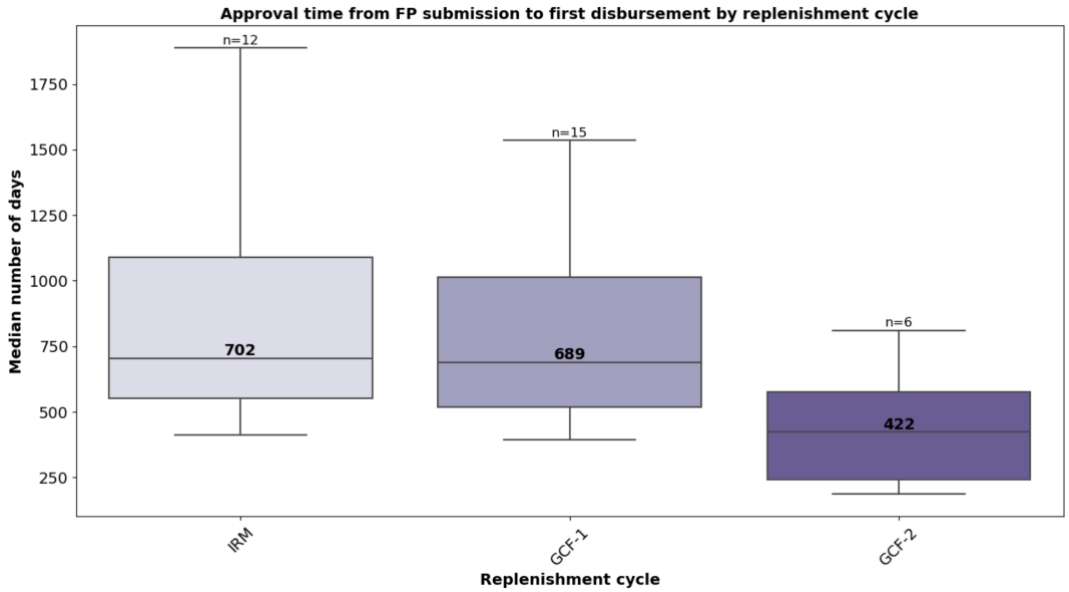
Source: iPMS data via semantic model as at B.41, (20 Feb 2025), n =49.

136. **Projects now wait longer to reach approval, but move faster once approved.** In simple terms, the reforms introduced at B.32 had very different effects depending on the stage of the project cycle. Before B.32, it took on average about 8 months to move from concept note submission to Secretariat receipt of the FP. After B.32, this same step stretched to almost two years. The time from submission to Board approval also became much longer, more than doubling. By contrast, once the Board had approved a project, the time to reach legal effectiveness and first disbursement improved markedly. In other words, reforms have shifted the bottleneck: projects now wait longer in the early preparation and review phases, but they move more quickly once approved.

2) Post-Approval Acceleration: Where the SAP Shows Promise

137. In contrast, the SAP displays a shorter median and mean number of days from FP submission to first disbursement across the three programming cycles; however, this difference is not statistically significant. Figure 14 shows how the median time from FP submission to first disbursement during the IRM period and GCF-1 fell slightly from 702 days to 689 days, and then fell sharply to 422 days in the GCF-2 cycle. An ANOVA across the three programming cycles also shows a sharp reduction in the average (mean) time from CN to first disbursement in GCF-2, along with broadly stable standard deviation figures. Yet, due partly to small subgroup sizes, an ANOVA shows the sharp reduction in time from FP submission to first disbursement is not statistically significant. It remains insignificant when controlling for key project characteristics within an ANCOVA.

Figure 14: Project Development Timeframe FP Submission to first Disbursement by Programming Cycle



Source: iPMS data via semantic model as at B.41, (20 Feb 2025), n= 35, projects that have reached first disbursement.

138. **Since B.32, median values suggest the SAP modality has become faster from Board approval to FAA effectiveness.** Table 8 shows that the timestamp from FP submission to FP approval has remained constant at approximately 270 days, reflecting some stability in the review and decision-making process. Table 8 also shows a significant improvement in the FP submission to FAA effectiveness.

Table 8: Project Development Timestamps Before and After B.32 with Median Values

Stages	SAP up to B.32	SAP after B.32	Sample size up to B.32	Sample size after B.32
FP submission to FP approval	269	271	24	25
FP approval to FAA effectiveness	381	140	23	17

Source: iPMS data via semantic model as at B.41, (20 Feb 2025).

3) Comparative Performance: SAP vs. Equivalent PAP Projects

139. When comparing the SAP portfolio and the PAP portfolio, it is essential to make reasonable and defensible comparisons. In this independent evaluation, we use two bandwidths.

140. Table 9 compares median figures for project development timestamps comparing SAP projects against PAP projects, which are (i) smaller than USD 25 million, and (ii) between USD 25 million and USD 50 million.

141. When contrasting SAP projects with comparable PAP projects using median figures, the SAP modality compares well in terms of CN submission to FP submission, requiring 335 days, as well as CN submission to FP approval, requiring 791 days. Furthermore, the SAP modality also shows the lowest median figure for FP submission to FP approval at 273 days, as shown in

142. Table 9. These results suggest that, on the surface, the SAP performs favourably in the pre-approval stages.

Table 9: Project Development Timestamps Comparing SAP Projects and PAP Projects with Median Values

Project group	CN submission – FP submission (median days)	FP submission – FP approval (median days)	CN submission – FP approval (median days)
SAP	335	273	791
PAP ≤ USD 25 million	381	379	1009
PAP > USD 25 million and ≤ USD 50 million	429	371	863

Source: iPMS data via semantic model as at B.41. The PAP comparison groups do not include REDD+ projects. Outliers are included. Only FPs that have submitted a CN.

143. **When using average (mean) figures and applying significance tests, the SAP modality is similar or slower to comparable PAP projects before Board approval and significantly faster afterwards. Overall, the SAP has become "virtually indistinguishable" from the standard PAP in operational terms.** Table 10 shows that the stronger SAP performance, vis-a-vis the two comparable PAP bandwidths when using median values, is not confirmed using average (mean) values. Table 10 indicates broadly comparable averages prior to Board approval. Further, analyses of variance for these three timestamps show no statistical significance. In contrast, the post-approval comparisons of the SAP versus two comparable PAP bandwidths show significant reductions for the SAP: reductions in processing time from FP approval to FAA execution at the 1 per cent level, from FP approval to FAA effectiveness at the 5 per cent level, and from FP received to first disbursement at the 10 per cent level. This may indicate that, because SAP projects are limited to the ESS Category C, legal negotiations between the GCF and the AE conclude more quickly.

Table 10: ANOVA of Project Development Timestamps Comparing SAP Projects and Equivalent PAP Projects

Timestamp / PAP bandwidths and SAP		N	Mean	Std. Deviation	F Between groups	Sig. with no controls	Sig. with controls
CN submission to FP submission	PAP ≤ USD 25 million	50	343.88	344.43	1.783	.171	0.048**
	PAP > USD 25 million and ≤ USD 50 million	75	448.33	379.98			
	SAP	49	483.67	438.67			
CN submission to FP approval	PAP ≤ USD 25 million	50	765.62	523.78	1.079	.342	.028**
	PAP > USD 25 million and ≤ USD 50 million	75	866.17	489.49			
	SAP	49	916.65	574.03			
FP submission to FP approval	PAP ≤ USD 25 million	64	476.08	466.04	.182	.833	.605
	PAP > USD 25 million and ≤ USD 50 million	92	445.18	335.54			
	SAP	49	432.98	428.16			
FP approval to FAA executed	PAP ≤ USD 25 million	64	325.53	334.23	4.974	.008***	.003***
	PAP > USD 25 million and ≤ USD 50 million	86	205.40	207.51			
	SAP	42	180.67	268.77			
FP approval to FAA effectiveness	PAP ≤ USD 25 million	62	451.06	358.46	3.039	.050**	.057*
	PAP > USD 25 million and ≤ USD 50 million	77	344.48	252.78			
	SAP	40	321.43	281.24			
FP submission to first disbursement	PAP ≤ USD 25 million	59	1036.66	578.30	2.588	.078*	.017
	PAP > USD 25 million and ≤ USD 50 million	75	868.53	370.01			
	SAP	35	848.45	493.93			

Source: iPMS data via semantic model as at B.41, n =49

144. Controlling for key project characteristics, such as AE type and thematic type, as well as public or private sector, downgrades SAP performance both before and after Board approval. The last column in Table 10 reports significance levels of analyses of covariance (ANCOVAS) across the SAP and the two PAP bandwidths, controlling for the key project characteristics of AE type, thematic type, and public or private sector. It shows some surprising results. Once the three controls are in place, the shorter timestamp for PAP projects from CN submission to FP receipt becomes significant at the 5 per cent level, as does the shorter PAP timestamp for CN to FP approval, also at the 5 per cent level. Of the three post-approval timestamps, where the SAP modality appears faster in, only FP approval to FAA executed remains as strong, with FP approval to FAA effectiveness slipping from the 5 per cent significance level to the 10 per cent level, and FP received to first disbursement losing significance altogether. Of the three controls, it is notable that the AE type shows significance for the pre-approval timestamps that start with a CN stage, and the public or private sector control shows significance for the post-approval timestamps. In other words, when we control for the fact that the SAP focuses on DAEs and a preponderance of public sector projects, we see faster timestamps for the stages that start with a CN.

145. The SAP shows mixed comparative performance against equivalent PAP projects. While the SAP performs comparably or slower in pre-approval stages, it demonstrates significantly faster post-approval performance (FP approval to FAA execution and effectiveness) compared to similarly-sized PAP projects, particularly for Category C projects.

146. The SAP has become "virtually indistinguishable" from the standard PAP in operational terms. Stakeholder interviews confirm that SAP submissions undergo identical review criteria and depth as regular proposals despite lower-risk categorization and smaller scale, undermining the rationale for separate modalities.

B. Critical Resource Gaps

1) The Disbursement Bottleneck: 25 per cent and Falling

147. **The aggregate disbursement and expenditure figures reveal a stark reality of implementation that fundamentally challenges the SAP's promise of effective climate finance delivery. Only 24 per cent of approved SAP funding has been disbursed to entities, with merely 7 per cent actually spent on implementation.** Of the USD 659 million approved across 49 SAP projects, only USD 159.7 million (24%) has been disbursed to AEs, with an even more concerning USD 45.7 million (7% of total approved funding) actually expended on implementation activities. This means that for every dollar approved by the GCF Board, only 24 cents reaches implementing entities, and only 7 cents translates into actual project expenditure that reaches beneficiaries. These figures represent a severe bottleneck in the climate finance delivery chain, suggesting that the SAP's operational challenges extend far beyond approval time frames to encompass fundamental implementation and resource flow constraints.

Table 11: SAP Financing vs. Disbursement and Expenditure

GCF Financing (USD)	Amount Disbursed (USD)	Expenditure Amount (USD)
658,780,321	159,683,140	45,729,472

Source: iPMS data via semantic model as at B.41. Expenditure amount from the 2023 cycle of APRs. 21 SAPs submitted APRs for this cycle.

2) The 29 per cent Implementation Reality

148. **Implementation performance, as measured by expenditure rates, varies dramatically by project characteristics.** Table 12 outlines how private sector projects demonstrate particularly poor expenditure performance at only 4 per cent compared to 17 per cent for public sector projects, suggesting that the SAP's procedural framework may be ill-suited to private sector implementation requirements and timelines. Project size emerges as a critical factor, with micro-size projects (25%) significantly outperforming small-sized projects (8%), potentially indicating differences in delivery capacity. Notably, national DAEs achieve the highest expenditure rate (19%) compared to international entities (16%) and regional entities (4%), challenging assumptions about capacity constraints among developing country institutions while raising questions about the effectiveness of regional implementation approaches within the SAP modality.

Table 12: Expenditure Rates by Project and Implementor Type

Sector	Percentage	Project Count
Private	4%	6
Public	17%	43
Total	15%	49
Project Size		
Micro	25%	20
Small	8%	29
Total	15%	49
Entity Type		
International	16%	26
National	19%	16
Regional	4%	7
Total	15%	49

Source: iPMS data via semantic model as at B.41 and APR2023 cycle

Note: the table shows the expenditure rates for SAP projects by project sector, size and accredited entity type.
Pre-Approval Delays: Where the SAP Gets Bottlenecked

149. **Project maturity significantly influences expenditure patterns.** Table 13 demonstrates that when comparing projects at similar maturity levels, the expenditure gap between the SAP and the PAP narrows considerably. For more mature projects with a >p50 maturity rate, the SAP records an expenditure rate of 29.9 per cent compared with the 52 per cent for the PAP. While the PAP still performs better, the gap is substantially smaller than the raw comparison suggests. Critically, both modalities show minimal expenditure activity for newer projects (<p50 maturity rate), with the SAP at 0.0 per cent and the PAP at 3.8 per cent, indicating that early implementation phases involve limited spending regardless of approval mechanism. This pattern suggests that the SAP's low

aggregate expenditure rates may reflect a combination of genuine implementation challenges and a portfolio that has not yet had sufficient time to reach full implementation capacity, highlighting the importance of considering project lifecycle dynamics when assessing modality effectiveness.

Table 13: Project Expenditure Rates by Maturity Level

	Expenditure Rate by Project >p50 Mat Rate					Expenditure Rate by Project <p50 Mat Rate			
	SAP		**PAP**			**SAP**		**PAP**	
Sector	Mean	N	Mean	N		Mean	N	Mean	N
Private	8.4%	3	63.4%	34		0.0%	3	5.6%	28
Public	32.9%	22	48.9%	127		0.0%	21	2.8%	50
Total	29.9%	25	52.0%	161		0.0%	24	3.8%	78
Project Size	Mean	N	Mean	N		Mean	N	Mean	N
Large	na	0	69.7%	30		na	0	7.4%	21
Medium	na	0	46.6%	65		na	0	1.4%	36
Micro	38.8%	13	74.3%	10		0.0%	7	0.0%	1
N/A	na	0	na	0		na	0	0.0%	3
Small	20.3%	12	44.7%	56		0.0%	17	5.2%	17
Total	29.9%	25	52.0%	161		0.0%	24	3.8%	78
Entity Type	Mean	N	Mean	N		Mean	N	Mean	N
International	25.9%	16	55.1%	128		0.0%	10	4.9%	60
National	44.0%	7	55.8%	18		0.0%	9	0.0%	11
Regional	13.0%	2	20.9%	15		0.0%	5	0.0%	7
Total	29.9%	25	52.0%	161		0.0%	24	3.8%	78

Source: iPMS data via semantic model as at B.41.

Note: the table compares SAP and PAP projects at similar maturity levels and presents their corresponding expenditure levels, including all PAP projects regardless of size.

V. DELEGATED AUTHORITY FOR SIMPLIFIED ACCESS

150. This chapter examines whether the SAP has delivered on its original promise of providing simple and timely access to climate finance for vulnerable communities. While designed as a faster route for smaller, lower-risk projects, the modality now operates within the same Board-centred processes as larger proposals, raising questions about its efficiency, cost-effectiveness and relevance. The analysis considers how governance structures, approval procedures, and operational processes shape timelines, transaction costs, and implementation flexibility. It also asks whether the SAP offers advantages over alternatives in the GCF context, and how its financial and human resource demands compare. The chapter looks beyond internal simplification to examine what **simplified access** requires in practice, drawing on lessons from other funds operating in high-risk, low-capacity settings.

KEY TAKEAWAYS

Dedicated Secretariat support has been central to SAP effectiveness, but its resource intensity limits scale. Proven frameworks such as R4 and Climate Risk and Early Warning Systems (CREWS) show that structured models can accelerate approvals while maintaining safeguards, yet the absence of delegated authority keeps all projects under Board control, sustaining bottlenecks despite procedural reforms. Comparative funds demonstrate that delegated approvals and context-specific frameworks deliver faster, simpler access in low-capacity settings, which are valuable lessons directly relevant to the SAP's mandate and future reform pathway.

151. Delegated authority for SAP approvals has been under consideration almost from the start, and was a central recommendation of the 2020 SAP evaluation. It was debated extensively prior to the B.32 reforms and continues to feature prominently in key informant feedback in this evaluation, where they again identified Board-centred approvals as a critical bottleneck.[75] The persistence of this concern underscores its relevance to any discussion on achieving "simple access" through the SAP.

152. The absence of delegated authority creates persistent bottlenecks that incremental reforms cannot resolve. While post-B.32 improvements have reduced documentation duplication, they cannot address the core governance constraint that prevents genuine simplification and maintains approval timelines similar to the PAP.

153. If small SAP-type projects targeted at lower-capacity countries, such as LDCs, African countries, SIDS, together with DAEs, are to play a meaningful role in the GCF's 50by30 vision, approval

[75] Delegated approval has been part of the SAP discussion since its launch. When the SAP Pilot was established, the Board also requested the Secretariat to develop a proposal for approvals between Board meetings (decision B.18/06, annex X). The 2020 IEU evaluation of the SAP made this a central recommendation, calling for between-meeting approvals on a no-objection basis and delegation of authority to the Executive Director for minimal/no-risk proposals (IEU 2020, *Independent Assessment of the SAP Pilot Scheme*, Recommendations 3(a), 4(a)). Secretariat papers to the Board subsequently advanced these options — including *Review of the SAP Pilot Scheme* (GCF/B.25/12) and *Update of the SAP* (GCF/B.28/08) — both of which recorded divided Board views. In the lead-up to B.32, consultations again showed a majority in favour of between-meeting approvals but continuing opposition from some members (GCF/B.32/05/Add.02). Delegated authority thus remained unresolved until the B.32 reforms, and continues to be raised by stakeholders in this evaluation. Find a fuller discussion of the historical context of the SAP's evolution in SAP2025 Evaluation, Volume II, Annex 2.

processes must move faster without overburdening the Board agenda. At present, fewer than three SAPs are approved per Board meeting, representing a very small share of total funding commitments but still requiring the same governance attention as much larger projects. This limits the overall scale of the SAP and constrains its ability to deliver on its access mandate.

154. These constraints are very evident regarding the access DAEs in SAP-priority countries have to GCF resources. Fewer than half of these DAEs have received any GCF project resources to date, and none appear as delivery partners in RPSP projects. This shortfall undercuts a core SAP objective to expand opportunities for national and regional entities in the most climate-vulnerable contexts. It suggests that without changes to approval pathways, the modality is unlikely to significantly shift the pattern of access for these institutions.

A. Factors Affecting Success

155. **Dedicated Secretariat support emerges as the single most important enabler of effective SAP implementation.** Over 40 per cent of survey respondents rated the SAP as mostly fit-for-purpose when technical partnership and hands-on guidance were provided, with staff acting as "sparring partners" significantly improving proposal quality and reducing review cycles. This role has been particularly valuable for DAEs new to GCF procedures, making the SAP a more approachable entry point.

156. The restriction to ESS Category C effectively reduced a major barrier to DAE participation by allowing even the least-accredited entities to participate. This has expanded eligibility for DAEs in LDCs, SIDS, and African states, many of which hold only Category C accreditation. However, the limitation also effectively excluded many important adaptation projects that involved physical works (so, Category B projects), narrowing the range of viable activities.[76]

157. **By contrast, the intensity of the review process often negates intended efficiencies.** Entities reported upward of 100–150 comments per review cycle, including sometimes repetitive or contradictory comments. As noted in Chapter 4, average approval times remain close to those of the regular process, reflecting persistent procedural bottlenecks.

158. Overall, to the extent the SAP has had success to date, it is a result of a resource-intensive Secretariat support process within a rather narrow project risk band. Without governance or process changes that reduce procedural uncertainty, the SAP faces obvious scaling constraints that limit its contribution to “simple access” for a broader range of entities and contexts.

159. Box 1 presents the R4 Rural Resilience Initiative, developed by the World Food Programme and Oxfam America. R4 shows how a proven, replicable framework can shorten preparation time, reduce perceived risks, and avoid the due diligence delays common with untested concepts. By pre-defining eligible infrastructure types, the World Food Programme maintains a Category C ESS rating while still supporting community-level adaptation investments. The example illustrates how structured programming models can align with SAP objectives and could support consideration of lower-risk delegated approvals.

160. An established framework like the R4 Rural Resilience Initiative has demonstrated replication potential across multiple contexts. This suggests that such models may provide sufficient evidence to support lower-risk delegated approvals while maintaining safeguards.

[76] One accredited entity emphasized: *“Having impact with only Category C projects is hard”* (AE-44). See also AE-3, AE-34 and Sec-55.

Box 1: The R4 Rural Resilience Initiative: Lessons for the SAP

Background

The R4 Rural Resilience Initiative combines four complementary risk management strategies: risk reduction through asset creation and climate-smart agriculture, risk transfer via weather index insurance, risk reserves through savings groups, and prudent risk-taking through access to credit. Piloted in Ethiopia in 2011, R4 has since been implemented by WFP in seven African countries in partnership with national and local governments, communities, and technical and financial partners, including private sector actors delivering specific "R" components according to country needs (WFP, 2019).

Evidence from GCF-Supported Projects (See SAP2025 Evaluation, Volume II, Annex 8)

- **FP049 Senegal** applied the R4 approach in five vulnerable regions, successfully integrating climate services into the national social protection system (WFP, 2017).
- **SAP007 Zimbabwe** supported widespread uptake of conservation agriculture and strengthened savings groups, with evaluation evidence showing measurable improvements in food consumption and dietary diversity among women-headed households (Particip GmbH, 2022).
- **SAP011 Mozambique** achieved high participation of women smallholders (59 per cent), contributing to more inclusive access to climate information and improved yields (World Food Programme, 2023).

Practitioner Perspectives

Interviews with WFP staff confirmed that while the SAP offered a more accessible entry point for R4-based projects, two procedural factors eroded its time advantages. First, multiple review rounds, often with extensive and occasionally inconsistent comments, added months to the approval process, even for projects based on a well-documented model. Second, rigid post-approval rules meant that design adjustments triggered by shifting field conditions required Board consideration if deemed "material," delaying implementation. In Zimbabwe, for example, a change to one output led to a protracted restructuring process that remains unresolved to this day. Practitioners noted that these approval and post-approval bottlenecks undermine one of the R4 framework's main strengths: the ability to adapt quickly to local needs and changing conditions.

Lessons for the SAP

- Proven frameworks such as R4 can shorten preparation and approval timelines by reducing technical uncertainties and limiting the need for extensive design revisions.
- Delays arise not only before approval but also after, due to rigid rules on what constitutes a "material change." Broadening delegated authority to cover both approval and in-implementation adjustments could help retain the adaptive flexibility of proven models.
- Bundling interventions, such as risk reduction, weather index insurance, and savings, delivers stronger resilience outcomes than single interventions, while lowering climate-related risks and creating viable entry points for private sector participation.
- Delegated approval of tested models could enable faster scale-up while preserving safeguards, supporting adaptive management, and maintaining delivery momentum in changing field conditions.

Implication for SAP Reform: Establishing framework approaches, such as R4, within delegated approval structures could help the GCF deliver timely, lower-risk adaptation support to LDCs and SIDS.

161. The WFP Accreditation Master Agreement with the GCF already includes a covenant to indicate how the agency will strengthen the capacity of potential national and regional entities to meet GCF accreditation requirements.[77] Embedding this type of commitment within pre-vetted frameworks such as R4 could help manage risk up front while enabling greater direct involvement of capable local partners, reducing reliance on repeated central approvals. Other climate funds use comparable

[77] The Accreditation Master Agreement between the GCF and the World Food Programme requires the agency to *"indicate how it intends to strengthen the capacities of, or otherwise support, potential subnational, national and regional entities to meet, at the earliest opportunity, the accreditation requirements of the Fund"* (Accreditation Master Agreement between the GCF and WFP, 23 November 2018, Clause 18)

arrangements. The GEF works with national executing partners, the AF applies EDA, and the CIF engages National Executing Agencies. All combine delegated decision-making with capacity development to expand access in low-capacity contexts.[78]

162. However, for the SAP to realize such benefits, governance structures must allow delegated authority in ways that preserve safeguards while genuinely simplifying access. The following section examines how current governance arrangements constrain the SAP's institutional potential and how comparator models have addressed similar challenges.

163. The SAP's institutional development potential remains constrained without delegated authority or risk-based thresholds. The modality's distinctive value in strengthening Direct Access Entity capacity through stepwise pathways cannot be fully realized under governance structures designed for larger, more complex interventions.

B. Governance Constraints

164. **B.32 reforms did not adopt framework approaches or delegated authority.** The SAP2020 evaluation recommended developing "framework approaches" for specific, recurring investment types, allowing subsequent proposals within an approved framework to be processed more quickly, potentially under delegated authority. The intent was to reduce transaction costs and shorten timelines by removing the need to re-evaluate standard design elements for each submission. Decision B.32/05 did not adopt this approach. Instead, it focused on procedural adjustments, including increasing the budget limit to $25 million, reaffirming the Category C eligibility criteria, and recommending a review of the processes. These steps have simplified documentation in some respects, but have not resolved the core governance issue that all SAP projects still require full Board approval, regardless of their risk profile or similarity to proven models.

165. In practice, the SAP has not consistently reduced the human and financial resources required for project preparation compared with the regular PAP. Survey results show that most AEs reported similar levels of effort for SAP and PAP proposals, with 64 per cent noting no reduction in human resource use and 50 per cent reporting no decrease in financial resources.[79] While some AEs noted modest savings in documentation and staff time, others described the SAP preparation as equally or more demanding, particularly when multiple review cycles were involved.[80]

166. Lengthy approval timelines compound these costs and, in adaptation contexts, can erode intended outcomes. Agricultural projects delayed beyond a planting season or early warning projects missing a high-risk period lose much of their impact. Even a six-month delay can undermine budget accuracy due to exchange rate fluctuations or shifting national priorities.

167. **SAP048 in Togo shows that accelerated approvals are possible.** By contrast, SAP048 in Togo, developed under the CREWS framework, moved from concept to Board approval in about six months – markedly faster than typical SAP or PAP cases. Interviews with BOAD, Secretariat staff, and the World Meteorological Organization attributed this to three factors: intensive co-design

[78] Other climate funds use comparable arrangements. The GEF works with national executing partners, the AF applies Enhanced Direct Access, and the CIF engages National Executing Agencies. All combine delegated decision-making with capacity development to expand access in low-capacity contexts (SAP2025 Evaluation, Volume II, Annex 7, *Benchmarking Comparison Matrices*, Table 1, "Access Modality" and "Core Operational Model")

[79] SAP2025 Evaluation, Accredited Entity Survey, Q11, March 2025. See also SAP2025 Evaluation, Volume II, Annex 11 "Survey Instruments" for the methodology description and question

[80] While some AEs noted modest savings in documentation and staff time, others described SAP preparation as equally or more demanding, particularly when multiple review cycles were involved (AE-10: *"Can be 3 rounds of comments, sometimes 4, as many as PAP"*; see also AE-22, AE-39, Sec-217, Sec-218)

between the Secretariat and AE, use of pre-existing feasibility and safeguards work from the CREWS portfolio, and high-level political support from both the GCF leadership and national authorities.

168. Structured frameworks can enable more timely and scalable delivery when paired with enabling governance. The R4 model demonstrated replication across multiple contexts, while the CREWS example showed how intensive co-design and pre-vetted technical baselines contributed to a six-month SAP048 approval in Togo, underlining the conditions under which such acceleration is possible.

169. Accelerated approvals remain rare under the SAP. Such accelerated approvals remain the exception. One key informant indicated that SAP048 was unique. For most AEs, transaction costs are high and timelines long, limiting the SAP's capacity to provide genuinely timely access. Box 2 examines the CREWS framework in greater detail, showing how structured partnerships and technical baselines can reduce procedural demands without compromising quality.

Box 2: Scaling up Climate Risk Early Warning Systems through the CREWS Framework

Background

The CREWS Initiative, launched in 2015 and hosted by the World Meteorological Organization, provides targeted support to the LDC and SIDS, in partnership with the World Bank and the United Nations Office for Disaster Risk Reduction. In 2023, the GCF partnered with CREWS to establish a dedicated Scaling Up Framework under the SAP. The framework supports the United Nations Secretary-General's "Early Warnings for All" initiative, recognizing the high cost-effectiveness of early warning systems in reducing climate-related losses.

Evidence from SAP Implementation

The CREWS framework builds on a tested pipeline of early warning investments, enabling rapid identification of projects ready for expansion. The SAP048 project in Togo, developed in collaboration with the West African Development Bank, progressed from concept to Board approval in about six months, far faster than typical SAP or PAP timelines. According to key informants, the acceleration reflected a co-creation process with the GCF Secretariat, the use of existing feasibility and safeguards assessments, and strong political backing at national and regional levels, as well as within the GCF.

Institutional Perspectives

Interviews with implementing partners, technical agencies, and GCF staff highlighted several success factors: leveraging CREWS' established portfolio, minimizing duplicative preparatory work, and ensuring close collaboration between the Secretariat and DAEs. Stakeholders emphasized that a regional presence and in-country co-design were essential for maintaining speed and quality. However, they cautioned that relying on external consultants, without deep DAE engagement, risks weakening long-term implementation capacity.

Lessons for the SAP

The CREWS framework shows how structured partnerships can rapidly scale up proven adaptation models through the SAP. Drawing on existing pipelines and technical baselines, and fostering co-creation between international and national actors, can deliver high-impact, low-risk proposals at speed. This approach demonstrates how the GCF can replicate and expand early warning investments while reducing approval bottlenecks and strengthening country ownership and institutional capacity.

C. Comparable Lessons and Feasible Alternatives

170. **Large climate funds and others show that safeguards can be maintained while removing procedural bottlenecks.** The benchmarking analysis and KIIs show a sharp difference in the approach to simplified access. Peer organizations deploy approval processes with agility and delegation of authority.

171. **Global Environment Facility / Least Developed Countries Fund – Medium-Sized Project Modality:** Under the LDCF, each LDC receives a fixed allocation per replenishment cycle (USD 20 million in GEF-8), limiting the number and size of projects. The Medium-Sized Project modality caps grants at USD 2 million, reducing design complexity and transaction costs. Project ideas are submitted by one of the 18 GEF Agencies as short CNs, with the option to request a small Project Preparation Grant. Concepts are vetted by the GEF Secretariat and Scientific and Technical Advisory Panel, then endorsed by the LDCF/SCCF Council. Final approval rests with the GEF CEO, after which implementation proceeds without further central review, allowing countries to focus on delivery rather than repeated justification.

172. **Adaptation Fund – Enhanced Direct Access:** EDA shifts approval from the AF Board to accredited National Implementing Entities (NIEs) by endorsing a broad programme framework rather than individual projects. The NIE sets objectives, defines eligible activities and safeguards, and establishes subproject selection processes through national consultation, before securing AF Board approval of the framework. Once approved, the NIE can allocate funding to subprojects without further Board involvement, greatly accelerating delivery and enabling adaptation of programming to local needs in real time.

173. **Climate Investment Funds – Dedicated Grant Mechanism:** The Dedicated Grant Mechanism channels Forest Investment Program resources directly to Indigenous Peoples and local communities through a two-tier governance structure. The CIF/FIP Trust Fund Committee approves a country's participation, allocates a national funding envelope, and endorses initial design parameters in the investment plan. A National Steering Committee - largely composed of Indigenous and local community leaders - then sets priorities and decides on individual grants, with an experienced National Executing Agency managing funds and compliance. Once established, the NSC can make funding decisions rapidly within agreed parameters, enabling responsive, locally-driven implementation.

174. Table 14 below summarizes the key design features of these comparator climate funds alongside two global health financing mechanisms, the Global Fund to Fight AIDS, Tuberculosis and Malaria and Gavi, the Vaccine Alliance, whose delegated authority models offer additional insights into balancing fiduciary oversight with timely access to resources.

Table 14: Approval Authority and Delegation Pathways in Comparator Funds

Fund/Mechanism	Financial Threshold	Approval Authority	Frequency/Modality	Lessons for the SAP
GCF/SAP	≤ USD 25M	Full GCF Board	3 Board sessions per year	Board-centred processes create unavoidable delays; limited ability to accelerate small-scale, low-risk projects.
Global Environmental Facility/Least Developed Countries Fund (Medium-Sized Project)	≤ USD 2M	CEO (delegated)	Rolling approvals	Relies on a small, known set of delivery partners, which speeds reviews but limits diversity and national ownership.
Adaptation Fund/Enhanced Direct Access	≤ USD 5M per project	AF Board (delegated review)	Intersessional + Board	Delegates project selection to accredited national or regional entities within an approved framework, reducing central review time but requiring strong fiduciary and safeguards systems locally.
Climate Investment Fund/Dedicated Grant Mechanism for Indigenous Peoples and Local Communities	~USD 4–6M per country (≤ USD 50K subgrants)	National Steering Committees	Continuous approval	Uses NSCs to manage grants under multilateral development bank fiduciary oversight, enabling local control and quick decision-making but dependent on sustained support from the implementing partner (World Bank).
Global Fund for AIDS, Tuberculosis and Malaria/Challenging Operating Environment Policy	Variable	Secretariat/ electronic "no-objection"	Rolling electronic approvals	Simplifies procedures in fragile contexts, allowing faster delivery but increasing reliance on trusted partners. The SAP could formalize lighter-touch processes for proven entities.
Gavi, the Vaccine Alliance/Fragility, Emergencies, and Displaced Peoples policy	Variable	CEO (delegated emergency authority)	Weeks (outside formal Board cycle)	Allows flexible eligibility and accelerated processes during crises, ensuring continuity but requiring robust risk monitoring. The SAP could adopt triggers to fast-track proposals in priority vulnerable countries.

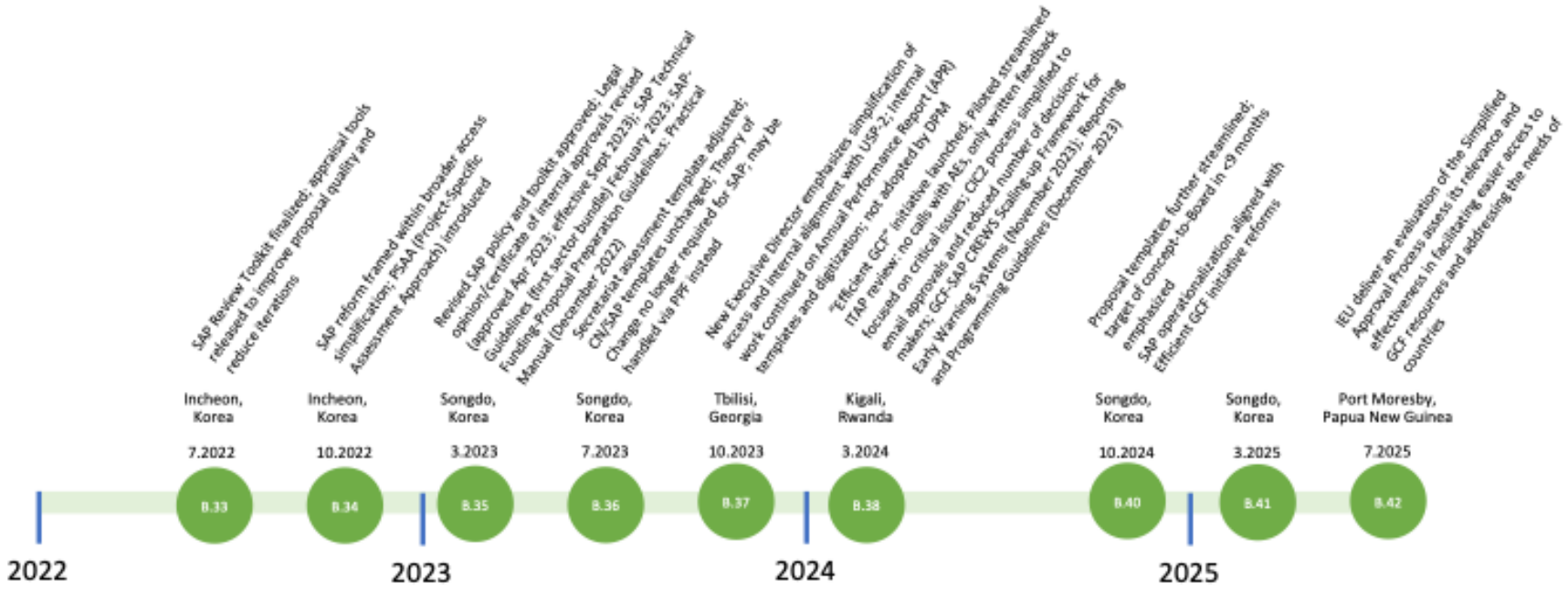
Sources: Evaluation team, based on GCF Board decisions B.18/06 and B.32/05, and comparator fund documentation. See SAP2025 Evaluation Volume II, Annex 7, *Benchmarking Comparison Matrices*

175. Large global funds show that safeguards can be maintained while removing procedural bottlenecks. Beyond climate finance, large vertical funds such as the Global Fund and Gavi have adapted their operating models to deliver in high-risk, low-capacity settings. The Global Fund's Challenging Operating Environments Policy and Gavi's Fragility, Emergencies and Displacement Policy establish explicit triggers for shifting to flexible oversight, streamlined requirements, and accelerated decision-making in contexts that require it.[81] These approaches suggest that safeguards can be maintained while removing procedural bottlenecks, offering relevant precedents for the SAP's intent to provide faster access in its priority contexts.

176. **Comparator experience underscores the distinction between "simplification" and "simple access".** Taken together, comparator experiences show that predictable, timely access in fragile and low-capacity settings depends on embedding enabling features into the funding architecture from the outset. In the comparator examples, these included pre-agreed delivery channels, delegated approvals, and other context-specific procedures. The SAP was intended to provide this kind of simple access to climate finance, but, as illustrated in Figure 15, most post-B.32 reforms have focused on simplifying existing procedures, including streamlined guidance, lighter iTAP reviews, simplified CIC2 clearances, and shorter templates. "Simplification" refers to accelerating the same process, while "simple access" concerns redesigning the process so that actors in vulnerable contexts can use it without navigating multiple layers of approval, conditionality, and uncertainty.

[81] See Global Fund, Challenging Operating Environments Policy (GF/B35/06, April 2016), and Gavi, Fragility, Emergencies and Displacement Policy (Gavi Board, December 2017)

Figure 15: Post-B.32/05 Reforms Implementation Timeline



Sources: GCF Secretariat Reports on the Activities of the Secretariat to the Board (B.33-B.40), internal SAP team workshop notes (March 2025), GCF Independent Evaluation Unit 2025 Work Plan

177. In contrast, in the comparators reviewed, risk is addressed at the outset, authority is closer to delivery, and projects can adapt to local needs without new Board approvals. Under the SAP, Board control over both approvals and many post-approval changes continues to constrain adaptive management.
178. R4 and CREWS show how structured frameworks and technical partnerships can reduce uncertainty, shorten timelines, and maintain safeguards, providing concrete examples of how efficiency and quality have been achieved elsewhere.

VI. PARADIGM SHIFT

179. This chapter examines how the SAP's original design intent aligns with its implementation, asking whether its added value lies in speed and transformational impact or in strengthening institutions, building confidence among DAEs, and replicating proven interventions. Using portfolio analysis, surveys, and case studies, it assesses the SAP's performance against its goals and considers whether its main contribution is to expand the pool of entities accessing climate finance rather than delivering large-scale direct impact.

KEY TAKEAWAYS

The SAP's added value lies less in speed or transformation than in institutional development, replication, and local adaptation. It has strengthened DAEs through confidence-building pathways and capacity development, while systematically supporting vulnerable communities. Evidence shows the SAP works best when scaling proven models such as R4 and CREWS, with contextual tailoring across diverse country contexts and through South-South exchange. Locally owned, co-designed projects demonstrate stronger sustainability, while innovation claims remain overstated and catalytic co-financing comparatively limited.

A. SAP'S IMPACT

180. **Stakeholders perceive the SAP as a modality with real potential that remains undermined by procedural ambiguity, rigidity, and design limitations.** Its strengths, including speed, predictability, and accessibility, are aspirational rather than consistently realized. When projects are based on proven approaches, forged by strong partnerships, and managed by capable entities, the SAP can support meaningful outcomes.[82]

181. The SAP has functioned primarily as a mechanism for institutional development among DAEs, rather than as a channel for rapid delivery or transformational impact. **Despite scepticism about the SAP's direct transformative climate impacts, stakeholders identify substantial value in its institutional development function.** DAEs explicitly recognize the SAP's "psychological" confidence-building effect, where the modality creates an experiential learning pathway from smaller projects to more ambitious initiatives. This perception of the SAP as primarily an institutional development tool rather than a direct climate impact mechanism represents a significant shift from its original conceptualization. While the PAP is judged mainly on its ability to deliver climate outcomes, stakeholders appear to evaluate the SAP through a different lens: as a capacity-strengthening mechanism that enables entities to eventually access larger climate finance through the PAP.[83] This perceptual shift carries important implications for how the SAP's success should be measured and communicated. Rather than competing directly with the PAP on climate impact metrics where structural limitations place the SAP at a disadvantage, stakeholders suggest its

[82] As one stakeholder remarked, *"SAP had untapped potential to expand access …"* (SAP-53). See also SAP-2, AE-9, SAP-24, Sec-139, Sec-149, and Sec-223

[83] According to the online survey, over two-thirds of respondents highlighted SAP's value as a capacity-strengthening tool, while less than half perceived it as effective in mobilizing additional co-funding compared to PAP

distinct value lies in activating and maturing entities that might otherwise remain excluded from climate finance, ultimately expanding the number of implementers capable of delivering effective climate action through either modality.

182. **The SAP functions as an institutional 'testing ground' where simplified procedures and innovative practices are first applied before being taken up across other GCF processes.** As these features are mainstreamed, the SAP's distinctive role within the Fund becomes less clear.

183. The SAP demonstrates significant value as an institutional capacity development mechanism, creating a stepwise progression path for DAEs. Respondents described this capacity-strengthening pathway in very practical terms. One DAE characterized the progression as moving "little by little" from USD 10 million to USD 25 million in SAP projects before advancing to USD 50 million in PAP projects. Specific initiatives such as CREWS were cited as providing structured opportunities for replication and technical deepening, while also developing AE champions and strengthening institutional capabilities. Secretariat staff further emphasized that absorptive capacity must be actively cultivated, noting that co-design approaches tend to produce more durable results than consultant-driven proposals. Several stakeholders confirmed that this stepping-stone role is particularly relevant for DAEs in SIDS and LDCs, and pointed to the potential for the RPSP DAE window to reinforce these trajectories once operational.[84]

184. **The SAP has effectively engaged experienced DAEs, strengthening local ownership and local capacity development.** In Bangladesh, SAP008, implemented by the DAE PKSF, has reduced flood vulnerabilities by elevating homesteads and promoting resilient agricultural practices, reaching nearly 90,000 beneficiaries directly and another 100,000 indirectly. The PKSF showcases the SAP's strategic role in strengthening a DAEs's ability to manage international climate finance directly, enabling efficient project execution and robust community-level implementation. SAP008 was built on a similar initiative by the PKSF under the World Bank-administered Bangladesh Climate Change Resilience Fund. More recently, the PKSF has received additional support from the GCF to implement SAP047 based on the same basic project design[85]. In Mexico, SAP023, managed by FMCN, used local partnerships to restore critical riparian ecosystems, significantly surpassing its midterm ecological restoration targets. As FMCN's "entry point" with the GCF, SAP023 was built on a successful Global Environmental Facility project implemented together with the World Bank initiative, "Conservation of Coastal Watersheds to Achieve Multiple Global Environmental Benefits in the Context of Changing Environments". Through the SAP, FMCN has gained the confidence to manage projects independently.[86]

185. **The SAP demonstrates a strong focus on targeting vulnerable people and communities.** Table 15 Analysis shows that SAP projects are associated with a 16.3 per cent increase in investments targeting the livelihoods of people and communities (statistically significant at the 1% level), suggesting the modality may be particularly effective at directing resources towards projects specifically targeting vulnerable populations. This positive relationship remains robust at 10.6 per cent to 12.0 per cent across more complex model specifications, consistently maintaining statistical significance (not shown). Similarly, SAP projects show a significant focus on targeting investments at the Health and Well-being, Food & Water Security result area (HW) in the base model, significant at the 1 per cent level. However, the HW effect decreases to approximately 3.2-3.4 per

[84] One DAE described its progression as moving *"little by little"* from smaller SAP projects toward larger PAP initiatives (DAE-21). See also SAP-45, SAP-46 (CREWS replication and scaling), Sec-223, Sec-229 (absorptive capacity and co-design), Sec-208 (SIDS/LDC entry point), and Sec-65, Sec-66 (RPSP linkages)
[85] For details, see SAP2025 Evaluation, Volume II, Annex 8, Case Studies, SAP008 (Bangladesh, PKSF)
[86] For details, see SAP2025 Evaluation, Volume II, Annex 8, Case Studies, SAP023 (Mexico, FMCN). This assessment is consistent with perspectives shared by key informant interviews

cent and loses statistical significance when controlling for additional factors in Models 2 and 3. The persistence of the VC effect across all specifications, contrasted with the attenuation of the HW effect, suggests that the SAP may be particularly effective at directing resources towards projects that are specifically targeting the livelihoods of vulnerable people and communities.

Table 15: Summary of SAP Impact on Key Outcome Variables

Outcome Variable	SAP Coefficient	Standard Error	p-value	N
Food Security and Health (HW)	0.106***	(0.0349)	<0.01	277
Vulnerable People and Communities	0.163***	(0.0341)	<0.01	277

Source: Regression analysis of GCF project data
Notes: Standard errors in parentheses. *** p<0.01, ** p<0.05, * p<0.1

Sustainability and Replication as Success Drivers

B. SAP's Adaptation

186. **The SAP has supported adaptation outcomes in food security and community resilience, often through systematic replication.** Evidence shows that projects scaling proven interventions across different contexts can adapt to local needs and priorities while maintaining core effectiveness. The SAP has consistently supported impactful adaptation outcomes, notably in enhancing food security and community resilience, highlighting its potential as a dedicated window for scaling and replication. In Mozambique, SAP011 provides compelling evidence of the SAP's ability to adapt and scale proven interventions such as climate-resilient agricultural practices. Through training more than 12,000 smallholder farmers, primarily women, the project doubled crop yields and significantly increased food-secure households in climate-vulnerable Tete Province[87]. Likewise, in Zimbabwe, SAP007 not only improved food security through resilient agricultural methods but also fostered financial inclusion and diversified livelihoods via savings and credit groups. The clear success in replication of the R4 model across different contexts underscores the SAP's potential for widespread impact through systematic replication[88]. Although the context in Zimbabwe and Mozambique is very different, components of the R4 model can be easily adapted to different needs and community priorities.

187. The SAP's effectiveness in Fragile and Conflict-Affected States demonstrates the critical importance of contextual adaptation. These challenging environments, where simplified interventions would seemingly offer the greatest value, reveal how success depends on adapting proven models to specific territorial realities rather than imposing standardized approaches. The evidence points to emerging South-South knowledge transfer mechanisms as effective pathways for contextual adaptation, such as the Green Gicumbi model from Rwanda being introduced to South Sudan. This suggests that sustainable replication requires multi-country learning approaches that enable tested interventions to be modified for different conflict-affected contexts while maintaining their core effectiveness.

188. **The Secretariat's expanding FCAS workstream reinforces two key success factors for sustainable climate interventions: genuine country ownership through co-creation processes,**

[87] For details, see SAP2025 Evaluation, Volume II, Annex 8, Case Studies, SAP011 (Mozambique, WFP)
[88] Evidence on SAP007 (Zimbabwe, WFP) is drawn from the case study (SAP2025 Evaluation, Volume II, Annex 8, Case Studies, SAP007), which documents impacts on food security, financial inclusion and livelihoods. Replication of the R4 model across multiple contexts is further illustrated in Box 1

and systematic replication of proven models adapted to local circumstances. Respondents emphasized how successful SAP projects in FCAS contexts emerge from fostering trusted collaborations with in-country teams to co-develop proposals section by section, ensuring that interventions build upon rather than bypass existing capacities. The development of flexible template projects focused on critical sectors like agriculture, health, and energy represents a promising approach to systematic replication that maintains technical quality while allowing contextual adaptation. However, the inherent tension between the SAP's risk requirements and the adaptive flexibility needed in fragile contexts remains a constraint on the modality's potential impact in these critical environments.

C. SAP AND LOCAL ENGAGEMENT

189. **The SAP's most significant potential lies not in accelerating project approval but in facilitating a fundamental shift from treating local entities as passive beneficiaries to recognizing them as active agents of local development.** Effective climate action emerges when local communities transition from being objects of intervention to drivers of their development processes. This shift requires moving beyond conventional expert-driven models to approaches that prioritize dialogue, negotiation, and collaboration, with external actors serving as facilitators rather than directors. The territorial approach recognizes that lasting climate resilience cannot be imposed through standardized technical packages, but must be co-created through processes that respect local knowledge, power dynamics, and cultural contexts. For the SAP to realize its potential, particularly with DAEs in vulnerable contexts, the modality must embrace this paradigm shift, supporting projects that build upon existing territorial realities, strengthen local ownership structures, and create space for genuine negotiation between diverse stakeholders with potentially conflicting interests.[89] This represents a move away from extractive project models towards collaborative territorial agreements that emerge from local priorities and capacities rather than external prescriptions.

190. The SAP experience highlights both the advantages of proven frameworks and the potential for locally-driven approaches. Analysis indicates that standardized models such as R4 and CREWS have advanced more quickly through the approval process, reflecting their suitability for risk-balanced delegated authority. At the same time, projects emphasizing locally-driven development, co-created with local actors and responsive to knowledge systems and power dynamics, point to pathways for deeper and more lasting climate resilience. However, these approaches often require more complex design and implementation.

191. **Project quality is seen as a function of entity capability and local relevance, not of the approval modality.** Stakeholders consistently observed that the quality of SAP and PAP projects depends less on the modality itself than on who designs and implements them. They emphasized that strong national structures and prior experience are crucial.[90] By contrast, weaker SAP projects, such as SAP009 in Laos, falter not because of the SAP modality itself but because of limited local implementation capacity and lack of continuity in personnel.

192. Process design factors significantly influence implementation quality and outcomes more than modality distinctions. Co-design processes that meaningfully engage DAEs throughout development

[89] One respondent from the Key Informant Interviews mentioned "*Co-design with local teams significantly improves project execution compared to consultant-driven approaches*"
[90] Stakeholders emphasized that project quality depends less on the SAP or PAP modality than on entity capacity and local relevance. As one ITAP member noted, *"No particular difference between SAP and PAP"* (ITAP-12). See also DAE-31, Sec-223, Sec-229 and Sec-143

lead to substantially improved implementation outcomes compared to consultant-driven approaches, regardless of whether projects use SAP or PAP procedures.

193. Turning to the longevity of results and outcomes, our sample of SAP and PAP case studies suggests the sustainability prospects of the projects were varied based on local institutional capacities and ownership rather than modality distinctions, according to the evaluations carried out by AEs. For example, in Namibia, FP024 effectively integrated sustainability by embedding climate actions within existing local governance frameworks, while in Peru, FP001encountered sustainability challenges due to political instability and turnover despite strong indigenous involvement. A critical insight is that implementation effectiveness and sustainability are largely shaped by local context, entity capabilities, and the appropriateness of the intervention type, suggesting that the PAP versus SAP choice alone has limited impact on long-term effects and impacts.[91]

194. **Evidence from the LORTA portfolio indicates that projects incorporating traditional environmental knowledge exhibit greater sustainability prospects than those relying solely on modern interventions.** Traditional ecological knowledge systems often provide more robust foundations for long-term climate resilience than externally introduced technologies, challenging conventional assumptions about modern climate-smart approaches. The Learning-Oriented Real-Time Impact Assessment programme, covering approximately 25 GCF projects, has documented how traditional ecological knowledge systems often provide more robust foundations for long-term climate resilience than externally introduced technologies. This finding challenges conventional assumptions about the superiority of modern climate-smart approaches.[92]

195. In Guatemala, FP087 provides compelling evidence of this dynamic, where Maya communities' traditional MILPA agricultural practices showed greater climate resilience than newly introduced conservation techniques. The midline evaluation found that households practising traditional MILPA cultivation demonstrated superior adaptive capacity during climate shocks, maintaining higher crop diversity and more effective soil and water conservation measures. The three-crop intercropping system (maize, beans, and squash) created natural pest management and soil fertility maintenance that modern interventions struggled to replicate effectively.[93]

196. Similarly, in Madagascar, FP026 encountered resistance to introduced technologies where communities possessed well-developed traditional resource management systems. Communities with strong customary governance structures showed limited uptake of project-promoted techniques, not due to lack of capacity but because existing traditional systems already addressed the intended outcomes. This pattern suggests that sustainability depends on careful integration of innovations with proven traditional approaches that communities can maintain independently.[94]

197. The LORTA findings indicate that sustainable climate adaptation emerges from hybrid approaches that strengthen rather than replace traditional ecological knowledge systems. The SAP's potential for generating sustainable outcomes lies not in its speed or simplification, but in its capacity to support

[91] For details, see SAP2025 Evaluation, Volume II, Annex 8, Case Studies: FP024 (Namibia, UNDP) and FP001 (Peru, PROFONANPE)
[92] IEU's Learning-Oriented Real-Time Impact Assessment (LORTA) embeds theory-based impact evaluations in GCF projects to build AE capacity and evidence on what works. As of late 2024, the portfolio covers 26 projects. Recent synthesis findings emphasize the importance of local context for resilience and note potential synergies between traditional knowledge and modern agricultural practices; lessons from SAP023 (Mexico) further highlight integrating localized approaches and robust monitoring. (*LORTA Synthesis Report 2024*, sections II–IV and Annex I.)
[93] No midline or comparative outcome data on MILPA vs modern practices is yet published. Available baseline documentation outlines the project's theory of change and evaluation design (LORTA Baseline Report for FP087, Guatemala, 2022)
[94] Independent Evaluation Unit (2024). LORTA Impact Evaluation Midline Report for FP026 – Sustainable Landscapes for Eastern Madagascar. Incheon: Green Climate Fund

locally-owned approaches that build upon existing knowledge systems while selectively integrating complementary modern techniques**.**

D. Sustainability and Replication as Success Drivers

198. **Evidence from project mapping shows that most SAP projects focus on scaling or adapting existing models rather than testing new concepts to pursue transformational change. This highlights a tension between the SAP's ambition to foster innovation and the GCF's expectation of transformational impact.**

199. Systematic analysis reveals a clear pattern favouring replication over novelty as the pathway to sustainable impact. The SAP's most successful interventions consistently build upon proven approaches rather than pioneering untested concepts, with projects achieving greater influence and systemic uptake when they replicate tested interventions with appropriate local adaptation.

200. The SAP has shown value in enabling targeted, replicable interventions and engaging less experienced actors. Interviewees acknowledged that the SAP has created entry points for DAEs and allowed IAEs to scale test models.[95] One key informant referenced a scalable risk management model that has proven effective across diverse contexts. Interviewees emphasized that the "fit-for-purpose" nature of these projects, built on solid technical foundations from past experiences that were adapted to the local context, is more important than the procedures in the modality itself.

201. **Systematic analysis of project positioning reveals a clear pattern favouring replication over novelty as the pathway to sustainable impact.** The modality's most successful interventions consistently build upon proven approaches rather than pioneering untested concepts, suggesting that the SAP's comparative advantage lies in adapting and scaling existing models rather than generating breakthrough innovations. This pattern reflects both the structural constraints of Category C projects, which limit scope for experimental approaches, and the practical realities faced by DAEs operating with constrained implementation capacity. The evidence indicates that projects achieve greater influence and systemic uptake when they replicate tested interventions with appropriate local adaptation, while those attempting genuine innovation struggle to achieve comparable reach despite potentially valuable learning outcomes. This dynamic raises fundamental questions about the SAP's positioning within GCF's broader portfolio: whether the modality should embrace its role as a replication and scaling mechanism, or continue pursuing innovation objectives that may be structurally misaligned with its design parameters and implementer capabilities.

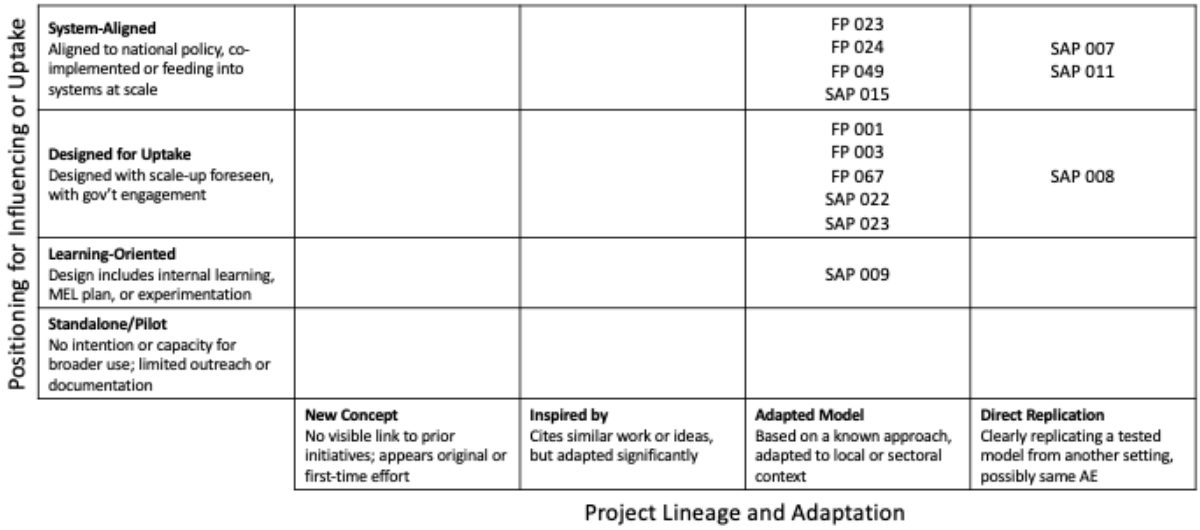
[95] Interviewees acknowledged that the SAP has created entry points for DAEs and allowed IAEs to scale tested models (Sec-61; Sec-208; SAP-45; SAP-46; DAE-8)

Figure 16: Scaling Framework Introduced in the SAP2020 Evaluation

Source: Author's Interpretation of the Independent Evaluation Unit's (2020d) Figure IV-7 "How the objectives of the projects approved through the SAP modality feature in the spectrum from research/innovation to 'ready for scale-up/replication"

202. Figure 16 adapts the continuum first introduced in the SAP2020 evaluation, illustrating how projects may evolve from research and innovation through proof of concept, programmatic implementation, and scaling to systemic integration and, ultimately, paradigm shift. The SAP2025 evidence shows that most mapped projects cluster between proof of concept and programmatic implementation, with relatively few positioned at the far ends of the spectrum. This placement highlights the tension between the SAP's ambition to encourage innovation and the GCF's expectation of transformational impact. The risk profiles depicted here underline the challenge: while the risk of the idea diminishes as evidence builds, implementation risks rise when projects seek broader uptake, raising questions about whether the SAP is designed to balance both innovation and scale effectively.

Figure 17: Mapping SAP2025 Case Study Projects Relative to Project Lineage and Positioning for Uptake or Scale-up



Source: IEU SAP2025 Evaluation, Volume II, Annex 9, *"Case Study Project Origins and Adaptation"*

203. Figure 17 situates the case study project examples (both SAP and PAP) investigated by this evaluation along two dimensions: their project lineage and degree of adaptation (x-axis) and their positioning for influence or uptake (y-axis). The placement reflects detailed case study evidence drawn from project documents and stakeholder interviews.[96] For example, direct replications such as SAP 007 and SAP 011 build squarely on the R4 Rural Resilience model, aligning closely with national delivery systems and therefore scoring high on system alignment. Adapted models such as FP 003 and SAP 023 show strong local tailoring and evidence generation, but their influence remains at the level of 'designed for uptake' rather than full institutional embedding. By contrast, learning-oriented cases like SAP 009 demonstrate innovation in applying ecosystem-based adaptation approaches to new urban contexts. Yet, their limited policy or institutional traction keeps them in the lower-influence quadrant. Overall, the mapping underscores the chapter's central tension: while the SAP has enabled projects that adapt and replicate proven models with pathways to systemic uptake, those introducing more novel concepts struggle to demonstrate comparable influence. Given the purposive selection of cases, this distribution reflects projects with stronger evidence bases rather than the full diversity of the SAP portfolio.

[96] The placement of projects in Figure 17 is based on case study evidence (SAP2025 Evaluation, Volume II, Annex 8: Project Case Studies) and triangulated with stakeholder interviews, including accredited entities such as WFP and FAO

204. **Analysis suggests that projects replicating established frameworks tend to show stronger system alignment and higher uptake potential**. By contrast, more learning-oriented projects that introduce novel approaches have so far achieved less institutional traction, even when generating outcomes of potential value.

205. Taken together, these figures suggest that most SAP projects with a documented evidence base have built on adapted or replicated models with clearer pathways to institutional uptake. The evidence indicates that projects rarely push the frontier of innovation while also securing broad influence, reinforcing the need to clarify whether the modality should primarily prioritize the replication and scaling of proven approaches, or carve out space for riskier innovation.

E. Paradigm Shift

206. A significant perception gap exists between the SAP's stated ambition for transformational impact and stakeholder assessments of its feasibility in practice. Stakeholders characterize claims of SAP projects being "transformative" as being a "fantasy story", reflecting profound scepticism about the modality's capacity to deliver paradigm-shifting outcomes given its structural constraints. Stakeholders similarly question the validity of investment criteria regarding the potential of SAPs to deliver a paradigm shift, explicitly describing expectations for a regional effect with a single project as unrealistic.[97] Logically, this perception of a credibility deficit would appear to be more pronounced for SAP than PAP, as the tension between modest scope, driven by Category C restrictions and smaller funding envelopes, and its ambitious impact claims creates particularly unrealistic expectations for SAP projects. While PAP projects face similar challenges in demonstrating a paradigm shift, their larger scale and ability to engage with more significant environmental and social dimensions at least provide a plausible pathway to transformative outcomes.

207. **Process design factors significantly influence implementation quality and outcomes**. Specifically, stakeholders distinguished sharply between consultant-driven versus co-designed project development approaches. By contrast, co-design processes that meaningfully engage DAEs throughout development lead to substantially improved implementation outcomes.[98] This process distinction appears to create a bifurcated effectiveness pattern where SAP projects developed through substantive local engagement demonstrate superior outcomes compared to externally formulated initiatives, regardless of modality differences between the SAP and the PAP. This finding carries significant implications for how comparisons between modalities should be evaluated, suggesting that process design factors may be more determinative of outcome quality than the formal distinction between the SAP and the PAP. It also indicates that implementation capacity, rather than approval efficiency, may represent the critical constraint on the SAP's comparative effectiveness in generating climate impacts.

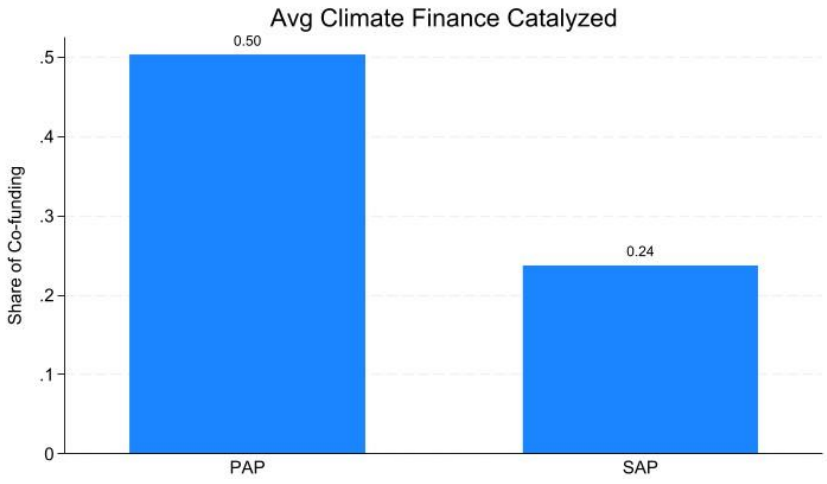
208. **However, the SAP shows significantly lower catalytic potential in mobilizing additional climate finance compared to the PAP,** which carries important implications for project sustainability and scaling. As illustrated in Figure 18, analysis of project-level data reveals that PAP projects leverage approximately 50 cents of co-funding for every dollar of GCF financing, while

[97] Stakeholders questioned the validity of applying paradigm shift criteria to SAPs, with interviewees pointing to the use of *"score cards for paradigm shift investment criteria"* as unrealistic for small projects (DAE-22). See also ITAP-10 and SAP-5

[98] Stakeholders distinguished sharply between consultant-driven and co-designed project development. Interviewees noted that *"co-design and co-creation – these write-shops …"* led to stronger proposals (Sec-9, Sec-223), while consultant-written proposals often performed poorly in implementation (Sec-229; see also Sec-134)

SAP projects mobilize only 30 cents per dollar. This systematic difference, confirmed through boxplot analysis showing most SAP projects clustering at lower co-funding shares, suggests structural limitations in the SAP's ability to attract complementary financing. The reduced co-funding mobilization constrains both immediate project scope and long-term sustainability prospects, as projects with higher co-financing ratios typically demonstrate stronger stakeholder ownership, enhanced implementation capacity, and a greater likelihood of continuation beyond GCF support. While the SAP successfully facilitates access for smaller entities that might otherwise struggle to access climate finance, this comes at the cost of reduced catalytic effect. This trade-off may limit the modality's contribution to transformational change and systematic replication of successful interventions. One possible concern here is the size of the projects. Stakeholders observed that SAP's smaller envelope and investment profile reduce its leverage potential, making it less effective at crowding in co-finance than PAP.[99]

Figure 18: Average Climate Finance Co-financing Catalysed, PAP vs. SAP



Source: iPMS data via semantic model as at B.41.

[99] Stakeholders highlighted that SAP's smaller envelope reduces its leverage potential, limiting co-finance compared to PAP (Sec-125). This perception is consistent with survey findings on co-financing challenges (SAP2025 Evaluation, Accredited Entity Survey, Q12)

VII. CONCLUSIONS AND RECOMMENDATIONS

209. The SAP was conceived as a transformative mechanism to address a fundamental challenge in climate finance: providing faster, more accessible funding pathways for smaller-scale, lower-risk climate interventions, with a particular focus on vulnerable people and communities.

210. The IEU first evaluated the modality in 2020 and concluded that while initial achievements were observable, ultimately the SAP had not simplified requirements or accelerated processes. The SAP's value added was limited in achieving its three expected outcomes: meeting urgent climate adaptation needs, enhancing direct access, and supporting scaling up.

211. A 2021 management action report found that the Secretariat had strengthened the integration of capacity strengthening elements, accelerated post-SAP-approval procedures, and simplified documentation through an SAP Appraisal Toolkit. However, the report also found that the Secretariat had not further developed a fit-for-purpose review process with tailored investment criteria or a strategy to integrate the modality. Eight years after its launch through decision B.18/06, this evaluation re-examines whether the SAP has delivered on its founding promise and what lessons emerge in the context of institutional change and the broader climate finance architecture.

CONCLUSIONS

Conceptual tensions in simplified access

212. The evaluation reveals a critical distinction that has shaped the SAP's trajectory. The distinction between "simplified access" and "simple access" explains why the modality has struggled to fulfil its foundational promise, despite successive reforms. The SAP has, in practice, pursued simplified access, making incremental improvements to existing procedures through streamlined templates, reduced documentation requirements, and procedural adjustments while maintaining the same underlying approval architecture. This approach remains anchored to established governance structures and review standards while attempting to reduce transaction costs through process optimization.

213. By contrast, simple access, as implied by the Governing Instrument and early constituency advocacy, goes beyond process optimization to remove structural barriers. It requires fundamental changes to governance structures, risk management frameworks, and incentives to create clear pathways for vulnerable countries and communities.

214. This distinction helps explain why **the SAP and the PAP have become almost indistinguishable, despite the intention to simplify.** Operating within the same governance framework designed for larger, more complex interventions creates contradictions that procedural reforms alone cannot resolve. The requirement for full Board approval, the application of identical investment criteria, and the maintenance of comprehensive review standards reflect entrenched institutional imperatives that override simplification objectives when they conflict with fiduciary responsibilities.

215. This tension is evident in the one-size-fits-all implementation that characterizes current SAP operations. Although the modality aspires to tailor approaches to diverse entity capacities and country contexts, in practice, it applies largely uniform requirements that prioritize consistency over responsiveness. The SAP's restriction to Category C activities illustrates this trade-off: it simplifies review procedures but excludes many adaptation interventions that involve moderate risk.

Operational inefficiencies and limitations

216. **Multiple lines of evidence indicate that the SAP has become operationally inefficient.** This conclusion is based on consistent empirical evidence showing that the SAP no longer delivers added value in speed or access.

217. The convergence between the SAP and regular approval processes has eliminated the efficiency rationale for maintaining separate procedures. Despite being categorized as lower-risk and having a smaller scale, the SAP is treated identically to PAP projects, with equal or longer processing times. With the Secretariat committed to reducing PAP timelines to nine months through the Executive Director's "Efficient GCF" initiative under the 50by30 vision, the SAP's current 12-month median offers no comparative advantage. Instead, it adds the burden of maintaining parallel approval pathways.

218. Resource delivery evidence compounds these concerns and has broader strategic implications for climate action. Low disbursement and expenditure rates reveal a fundamental breakdown in the mechanism's core function. These figures indicate that most of the Board-approved climate finance remains stalled in institutional processes rather than reaching implementation, where it can generate a measurable impact. At the same time, they highlight the need to examine AE implementation capacity more closely.

219. Transaction cost analysis further shows that many entities find that the SAP makes applying for funding harder than easier. Preparation costs of up to USD 750,000 and multiple review cycles undermine the supposed simplification. Reported costs exceed those of comparable funds by a factor of three to 10, while the volume of the comments in the review cycle, including some contradictory feedback, reflects unpredictable requirements and the continued need for specialized expertise.

220. The efficiency paradox extends beyond processing times to broader resource allocation. Running parallel SAP and PAP procedures consumes scarce GCF capacity without producing commensurate benefits. Maintaining two sets of staff, systems, and oversight mechanisms imposes opportunity costs that are especially significant given the urgent need for effective climate finance delivery and the GCF's limited resources.

Comparative approaches with different structural features

221. Benchmarking against successful simplified access mechanisms in other institutions helps illustrate both the specific challenges facing the SAP and the broader principles that enable effective, streamlined climate finance delivery. Comparative analysis shows that successful mechanisms share structural features largely absent from the SAP, strongly suggesting the need for fundamental, not incremental reform.

222. **Delegated authority emerges as a critical differentiator between successful simplified mechanisms and the SAP's current approach**. Institutions like the GEF, AF, and Gavi demonstrate that delegated decision-making enables approvals within months, or even weeks, when governance aligns with operational needs. For example, the GEF's Medium-Sized Projects achieve approvals through CEO delegation within six to nine months, while the AF's EDA allows national institutions to approve subprojects within approved frameworks. Gavi's emergency policy permits CEO approval within weeks for urgent health interventions, showing that rapid response is feasible under supportive governance structures.

223. Integrated support is another success factor distinguishing effective mechanisms from the SAP's more fragmented approach. Preparation grants embedded within project cycles make support predictable, accessible, and faster to deploy. The AF allows PFGs at the concept stage, while the

GEF offers integrated Project Preparation Grants that can be requested simply by ticking a box on the PIF. These approaches avoid the separate application requirements that add months to SAP timelines, while providing more reliable preparation support.

224. Risk-appropriate procedures also trigger successful simplified mechanisms. Adapting review standards to actual risk profiles reduces transaction costs while maintaining quality assurance. The CIFs' Dedicated Grant Mechanism uses community-led governance for small grants, while the Global Fund's COE policy adapts procedures for fragile contexts. These approaches show that simplified procedures can still uphold accountability when institutional incentives support proportionality.

225. Clear targeting enables successful mechanisms to optimize procedures for specific constituencies rather than attempting to serve all developing countries with uniform processes. By focusing on clearly defined groups, mechanisms can balance accessibility with accountability more effectively. For example, the GEF's Least Developed Countries Fund serves only LDCs, while the CIF's Dedicated Grant Mechanism is tailored to Indigenous Peoples and local communities. This specificity allows procedural customization that broadly applicable mechanisms cannot achieve.

226. Institutional culture and incentive alignment play a decisive role in mechanism effectiveness. Where institutions prioritize speed and accessibility, simplification objectives are reinforced rather than undermined. Successful simplified approaches operate within organizations where these priorities are embedded. In contrast, at the GCF, comprehensive review and risk mitigation often take precedence over reducing transaction costs when the two objectives conflict.

The innovation-replication nexus

227. **The evaluation reveals a fundamental contradiction between the SAP's innovation aspirations and its operational reality.** Decision B.32/05 sets the expectation that SAP proposals should demonstrate "potential for transformation and promote a paradigm shift." Yet, evidence shows that the projects with the strongest impact have concentrated on replicating and adapting proven models.

228. For example, the R4 Rural Resilience Initiative, replicated across multiple African contexts, and the CREWS framework, scaled through SAP048 in Togo. Both of these SAP activities demonstrate stronger institutional uptake and clearer pathways to systemic impact than experimental interventions based on untested concepts.

229. This pattern reflects an inherent tension between expectations and structural constraints. Category C restrictions, smaller funding envelopes, and risk-averse review processes favour tested approaches over experimentation. The absence of a GCF-wide definition of innovation has created systemic confusion, inside and outside the organization, about what constitutes transformational impact, contributing to the credibility gap identified in stakeholder interviews.

230. The IEU's 2020 SIDS evaluation provides a more nuanced framework for assessing innovation. It distinguishes innovation across four dimensions: type, scale, context, and intensity. This approach indicates that most GCF projects represent contextual adaptations rather than global breakthroughs. In SIDS, only a few reported innovations were "new at the regional or global level." This shows that GCF innovations are often valuable without being disruptive, and that assessing them against inappropriate benchmarks has created unrealistic paradigm shift expectations.

231. The SAP's comparative advantage may lie in scaling proven interventions in new contexts. It should encourage the replication and scaling up of innovation and fit-for-purpose technology solutions to enhance climate resilience in vulnerable contexts. Replication with local adaptation offers a legitimate form of innovation that prioritizes access and inclusion over novelty. Case studies show that projects achieve meaningful impact by systematically replicating tested models across different

territorial contexts, tailoring them to community needs, AE absorption capacity, governance structures, and environmental conditions. This approach aligns with the SAP's foundational targeting of vulnerable countries and DAEs. Here, innovation lies in demonstrating that less-resourced entities can successfully implement effective climate interventions in challenging contexts. Reframing the SAP's role around contextual scaling rather than breakthrough innovation could resolve the current credibility gap and provide a more realistic, achievable mandate for simplified access mechanisms.

Governance and limited delegation

232. **The governance structure surrounding approval authority represents an unresolved tension within the GCF's institutional framework**. While comparator organizations and peer multilateral funds rely on delegated approval mechanisms, the GCF requires universal Board approval for all SAP proposals regardless of scale or risk. Stakeholder perspectives remain polarized: some AEs argue that expanded delegated authority would reduce bottlenecks and transaction costs, while others stress the importance of maintaining Board oversight and comprehensive due diligence.
233. The evaluation cannot definitively determine whether delegated authority would enhance or compromise outcomes. However, the persistence of these divergent perspectives underscores the need for deliberate and transparent policy dialogue on the conditions and safeguards under which delegated authority could genuinely support simplified access objectives.
234. The SAP portfolio shows notably limited private sector participation. Structural misalignment between private sector requirements and the SAP design discourages engagement. Private projects are constrained by Category C restrictions, strict investment criteria, and modest financial scales that do not justify the costly structuring typically needed to attract private investors. As a result, private sector expenditure performance has lagged behind that of public sector projects.
235. While developing a comprehensive private sector strategy exceeds this evaluation's mandate, the evidence highlights the participation gap and the need to consider whether simplified approval modalities are appropriate vehicles for private climate investments. Findings suggest that private sector engagement may be better pursued through alternative GCF instruments tailored for risk-sharing and investment structuring.
236. The continued restriction of SAP eligibility to Category C projects fundamentally limits the modality's strategic relevance. By excluding small-scale infrastructure and resilient agriculture systems, the restriction narrows the portfolio to a subset of lower-risk interventions. Many of these excluded activities are standard in comparator funds. This limitation curtails the SAP's catalytic potential for transformational climate action. Addressing this constraint warrants consideration by the Board of replacing the exclusionary rule with proportional risk management frameworks, enabling the SAP, or any successor modality, to better support strategic objectives while upholding safeguards.
237. These outstanding issues are consistent with broader institutional design questions identified by earlier IEU evaluations. The persistent need for simplified access windows, especially for DAEs and projects in SIDS, LDCs, and African countries, reinforces the utility of targeted instruments. The 2021 IEU evaluation of the request for proposals (RFPs) modality emphasized the value of such instruments for filling portfolio gaps and stimulating proposals in priority thematic areas. Thematically focused RFPs, regionally tailored access mechanisms, or sector-specific simplified pathways are cited as viable ways to address the access gaps and meet the needs of the constituencies the SAP was originally designed to serve.

Institutional value beyond original intent

238. **While the SAP has failed as a simplification mechanism, the evaluation identifies significant unintended impacts in its evolution towards institutional capacity development.** This unplanned result has generated tangible benefits for DAEs, strengthening climate finance capabilities beyond individual project outcomes. The stepping-stone effect described by stakeholders represents genuine institutional value, even if it contradicts efficiency objectives. Entities report that SAP experience builds confidence, develops procedural familiarity and fosters relationships that ease access to larger climate finance opportunities.

239. This progression from smaller to larger initiatives has created a pipeline of capable implementers that strengthens the climate finance ecosystem. The psychological dimension of capacity-strengthening, confidence gained through successful implementation, is particularly important for entities with limited international experience. This learning-by-doing effect reduces the risk of implementation failures that could damage both institutional reputation and climate outcomes, and it cannot be replicated through training programmes or technical assistance alone.

240. The evolution of the SAP towards capacity-strengthening also raises questions about institutional design. If institutional development is the SAP's primary value, alternative mechanisms may deliver it more efficiently, while dedicated readiness or technical assistance programmes could address these needs at lower cost. Conversely, if simplification remains the priority, then project financing may not be the most appropriate channel for strengthening institutional capacity.

241. Statistical analysis demonstrates that SAP projects are associated with a 16.3 per cent increase in investments targeting the livelihoods of people and communities, significant at the 1 per cent level. This evidence suggests that the SAP effectively directs resources to vulnerable populations, in line with its foundational logic. Vulnerable country groupings, LDCs, SIDS, and African States, collectively receive more than half of SAP financing.

242. The analysis further shows that sustainable climate action in vulnerable contexts depends on moving beyond externally driven models. **Projects co-created with communities and grounded in traditional environmental knowledge systems achieve greater sustainability than those relying solely on modern interventions.** A strong focus on vulnerable people and communities requires both their buy-in and their active participation in project design.

RECOMMENDATIONS

243. The SAP modality has become operationally ineffective in its current form, failing to deliver on its core promises of simplification, acceleration, and enhanced access. The mission drift from a vulnerable community focus towards serving as a capacity-strengthening mechanism for experienced entities represents a fundamental departure from the SAP's foundational objectives. While this evolution has generated value for participating institutions, it contradicts the original mandate to provide a simplified process and simple access for those most in need of streamlined procedures.

244. The SAP's core function of delivering climate finance remains unfulfilled. With low disbursement and expenditure, the modality has not succeeded in getting approved resources to flow to climate interventions on the ground. While capacity constraints among DAEs contribute to these outcomes, the persistence of governance bottlenecks and lack of SAP-specific support structures mean the mechanism has not been equipped to overcome such challenges.

245. Because incremental changes have failed to fix ongoing problems, these recommendations call for major institutional changes to create truly simple access pathways that better serve vulnerable countries, peoples and communities. These institutional changes will ensure the GCF better fulfils its mandate of promoting paradigm shifts towards low-emission and climate-resilient development pathways. The urgency of the climate challenge, combined with tightening global climate finance availability, demands that multilateral institutions like the GCF maximize their effectiveness in serving those most in need.

246. The evaluation team provides recommendations to both the GCF Board and the GCF Secretariat, as follows:

247. **Recommendation 1: The GCF Board should consider discontinuing the SAP modality in its current form, as operational ineffectiveness remains and the delivery of climate finance has been limited.**

The Secretariat could begin phasing out the SAP**,** with a view to its complete closure in its current form as soon as operationally feasible. As an access modality, the SAP has not met expectations to simplify or expedite climate finance delivery. Instead, it has become operationally ineffective and virtually indistinguishable from the regular PAP.

248. **Recommendation 2: The GCF Board and Secretariat should expedite the design and launch of an alternative, integrated access modality tailored to vulnerable countries, people, and communities**.

This new modality should replace SAP, build on lessons learned, and be designed around flexible, risk-appropriate processes and delegated authority to the Secretariat. A fit-for-purpose "simple access" window managed by the Secretariat would provide broader eligibility and streamlined governance. The concept of vulnerability, whether for countries or communities, should remain the central criterion, as originally intended, to proceed under more flexible rules. The Board should take into account the needs of countries that are particularly vulnerable to climate change effects, including LDCs, SIDS, African States. This change acknowledges that a fundamentally new approach is required.

The new modality could also adjust environmental and social risk thresholds. Restricting the SAP to minimal-risk Category C projects has narrowed its scope and accessibility. Many small-scale adaptation projects, such as climate-resilient agriculture with minor infrastructure or community-level coastal protection that often carry moderate risks, are excluded from the modality. The new modality could therefore allow medium-risk Category B projects with streamlined safeguards, while continuing to exclude higher risk interventions.

The Secretariat could consider introducing policy and governance reforms to streamline approval processes for the new modality. These should include delegating approval authority for small projects to the Executive Director and instituting review workflows on a rolling basis.

249. **Recommendation 3: The Secretariat should center the alternative, integrated access modality on local approaches across the project cycle.**

The new modality should ensure strong country context linkages through co-development processes. The Secretariat should consider encouraging funding proposals that adopt area-based and landscape approaches, addressing climate challenges at the community or ecosystem levels. By focusing on local context linkage and co-development with stakeholders on the ground, GCF can ensure projects are appropriate to the socio-cultural and environmental reality, thereby improving absorption capacity and effectiveness.

250. **Recommendation 4: The Secretariat should ensure the new modality does not pilot new and untested project ideas. Instead, it should encourage the replication and scaling up of innovation and fit-for-purpose technology solutions in vulnerable contexts.** To achieve this, the Secretariat should:

- **4.1 Define appropriate innovation requirements for different types of projects and modalities.** The Secretariat should establish a tailored approach to innovation and provide clear guidance distinguishing between innovation expectations for different project categories and modalities. In particular, projects of the new modality should be able to foster technology transfer, scaling-up innovative, and evidence-based approaches that engage with local stakeholders (e.g. indigenous people, youth, female-led and community-based entities).
- **4.2 Develop a system to track and replicate successful project models.** The Secretariat should ensure that the new modality identifies successful project models and replicates them. The Fund may wish to establish a mechanism to catalogue proven approaches from the GCF and other funds, and encourage their adoption.

Implementing these recommendations would enable the Fund to address a fundamental conceptual tension identified in the SAP: A simplified access modality cannot effectively serve as a "simplified access" tool and an "innovation/piloting" mechanism. The SAP struggled to fill both functions. The new modality should focus on replicating and scaling up proven interventions, while leaving piloting of new project ideas to dedicated innovation facilities better suited to higher-risk interventions. Experimental or pilot projects are supported through other channels, such as RFPs or the regular PAP, as appropriate.

251. **Recommendation 5: The Secretariat should promote greater institutional integration to ensure that simplified access functions as part of an integrated pathway rather than a parallel silo**.

The SAP experience shows that lessons are only valuable if translated into genuinely differentiated approaches rather than refined versions of current practices. To achieve this, the Secretariat could establish a cross-institutional task force to review and redesign coordination mechanisms across all GCF modalities and programmes, ensuring readiness support, project preparation facilities, and approval processes are integrated. Particular emphasis could be placed on linking RPSP and PPF support directly to the new modality.

ANNEXES

LIST OF KEY INFORMANTS

NAME	ENTITY
Abad, Carmenza Robledo	iTAP: Independent Technical Advisory Panel
Amany, Damit Serge Didier	BOAD
Amoussou, Atsou Edem Eric	BOAD
Anand, Anupam	Global Environmental Facility
Arnaoudov, Vladislav	Adaptation Fund
Ayonrinde, Folasade	GCF
Baasanjav, Tsolmon	GCF
Beauvillard, Alain	GCF
Bjerkmo, Martin	GCF
Boc, Gabriel	GCF
Bosi, Lorenzo	World Food Programme
Bouquet, Caroline	Mirova
Breitbarth, Tim	GCF
Carballo, Alejandra Pena	iTAP
Choga, Faith Chenesai	GCF
Chua, Peter	GCF
Corporal, Princess Kaite	GCF
Daniel, Tara	Active Observer (Developed Countries constituency)
De La Torre, Daniel	Global Fund to Fight AIDS, Tuberculosis and Malaria
De La Torre, Graciela Reyes Retana	Fondo Mexicano para la Conservación de la Naturaleza
Dickinson, Christopher	Asian Development Bank
Diedhiou, Abdou	La Banque Agricole
Dubreuil, Mathieu	World Food Programme
Dumas-Johansen, Marc	Center for International Forestry Research & World Agroforestry
Fakruddin, Bapon	GCF
Farchy, Daniel	GCF
Freitas, Eduardo	former GCF
Galmez, Veronica	GCF
Gathee, Nailan	La Banque Agricole
Gonzalez, Henry	GCF
Grütter, Jurg	iTAP
Hartman, Paul	Climate Investment Funds

NAME	ENTITY
Hodgson, Tiffany	GCF
Hoshie, Kato	FAO
Innocenti, Demetrio	former GCF
Intsiful, Joseph	GCF
Jung, Eugene	GCF
Kadian, Rashmi	GCF
Larroquette, Benjamin	UNDP
LaTrielle, Amy	Gavi, the Vaccine Alliance
Lee, Grace Eunhye	GCF
Macasil, Maria Lourdes Kathleen	World Meteorological Organization
Menezes, Debby	iTAP
Merlier, Robin	UNDP
Merritt, Robert	Conservation International
Moschetta, Francesco	Global Fund to Fight AIDS, Tuberculosis and Malaria
Moukaila, Moubarak	BOAD: Banque Ouest-Africaine de Développement
Mulon, Micol	World Food Programme
Nogueira, Ricardo	iTAP
Padrinao, Lalinka Yana	GCF
Panfil, Steven	Conservation International
Patange, Mayuresh	GCF
Petersen, Caroline	iTAP
Phadtere, Imelda	Save the Children
Pili, Chiara	World Food Programme
Punu, Brad	GCF
Rabener, Jennifer Ann	GCF
Sayed, Muhammed	Development Bank of Southern Africa (DBSA)
Singer, Benjamin	Global Environmental Facility
Singhal, Harsh	Prospereté Growth Fund
Sinha, Kavita	GCF
Soto, Freddy	GCF
Speck, Stephanie "Steph"	GCF
Taishi, Yusuke	UNDP
Tian, Xiaoyang	GCF
Toe, Dhisso Honoré	BOAD

NAME	ENTITY
Toole, Kelly	Save the Children
Traore, Ibrahim	BOAD
Velasquez, Jerry	former GCF
Ward, Michael	Climate Investment Funds
Wasti, Nazeem	GCF
Witte, Jan Martin	iTAP
Zahir-Bill, Gareth	GCF

Note: Due to legal and ethical considerations, we are not permitted to identify or list any agencies that have applied for but not yet received accreditation. These agencies are therefore not listed.

DOCUMENTS CONSULTED

Adaptation Fund (2015). *Guidance Document for the Adaptation Fund Enhanced Direct Access Pilot Mechanism.* Washington, DC. Available at https://www.adaptation-fund.org/document/guidance-document-enhanced-direct-access-eda-pilot/

Adaptation Fund (2021). *Instructions for Preparing a Request for Project/Programme Funding from the Adaptation Fund.* March. Washington, DC. Available at https://www.adaptation-fund.org/wp-content/uploads/2021/03/OPG-ANNEX-4-Instructions-March-2021-1.pdf

Adaptation Fund (2023). *Projects & Programmes Portfolio.* Washington, DC. Available at https://www.adaptation-fund.org/projects-programmes/

Adaptation Fund (2025). *Governance.* Washington, DC. Available at https://www.adaptation-fund.org/about/governance/ (accessed July 2025)

African Development Bank (2015). *Sénégal – Projet d'appui à la petite irrigation locale (PAPIL) : Rapport d'évaluation*. Tunis : African Development Bank, Agriculture and Rural Development Department. Available at: https://evrd.afdb.org/documents/docs/PN10576_SR_FR.pdf

Bhanja, David, and others. (2023). *Mid-Term Review Report – FP067: Building Climate Resilience of Vulnerable and Food Insecure Communities Through Capacity Strengthening and Livelihood Diversification in Mountainous Regions of Tajikistan.* September 2023. Internal Document

Béné, C., Mphale, M., & Mapfumo, P. (2023). *Mid-Term Evaluation Report: R4 Rural Resilience Initiative in Zimbabwe.* Rome, Italy: World Food Programme. Available at https://docs.wfp.org/api/documents/WFP-0000136596/download/?_ga=2.52690349.464918376.1756994662-985067486.1747219801

Caldwell, Molly, and Gaia Larsen (2021). *Improving Access to the Green Climate Fund: How the Fund Can Better Support Developing Country Institutions. Working paper.* Washington, D.C.: World Resources Institute. Available at https://www.wri.org/research/improving-access-green-climate-fund-how-fund-can-better-support-developing-country

Center for Environmental and Geographic Information Services (2023), *Interim Independent Evaluation of Extended Community Climate Change Project-Flood (ECCCP-Flood),* Dhaka. Available at: https://pksf.org.bd/wp-content/uploads/2023/12/SAP008_Interim-Independent-Evaluation-Report_ECCCP-Flood_Revised-3rd-round_clear-version_291023.pdf

Centre de Suivi Écologique (2015). *Funding Proposal: Increasing the Resilience of Ecosystems and Communities through the Restoration of the Productive Bases of Salinized Lands (FP003).* November. Dakar. Available at: https://www.greenclimate.fund/document/increasing-resilience-ecosystems-and-communities-through-restoration-productive-bases

Centre de Suivi Écologique (2020). *Annual Performance Report : Calendar Year 2020 – FP003.* February. Dakar. Available at: 2020 Annual Performance Report for FP003: Increasing the resilience of ecosystems and communities through the restoration of the productive bases of salinized lands

Centre de Suivi Écologique (2023). *Annual Performance Report: Calendar Year 2023 – FP003.* February. Dakar. Available at: 2023 Annual Performance Report for FP003: Increasing the resilience of ecosystems and communities through the restoration of the productive bases of salinized lands

Chapeyama, Oliver. (2020). *Midterm Review Report: Empower to Adapt (FP024).* August. Windhoek, Namibia: EIF. Internal Document.

Climate Investment Funds (2013). *Dedicated Grant Mechanism for Indigenous Peoples and Local Communities (DGM): Framework Operational Guidelines.* Washington, D.C. Available at https://www.climateinvestmentfunds.org/sites/cif_enc/files/meeting-documents/dgm_framework_operational_guidelines_final_0.pdf

Climate Investment Funds (2014a). *CIF Gender Review.* Washington, D.C. Available at https://www.climateinvestmentfunds.org/sites/cif_enc/files/meeting-documents/cif_gender_review_final.pdf

Climate Investment Funds (2014b). *Design and Implementation Plan for the Dedicated Grant Mechanism for Indigenous Peoples and Local Communities (DGM)*. Washington, D.C. Available at https://www.climateinvestmentfunds.org/publications/design-and-implementation-plan-dgm

Climate Investment Funds (2018). *Global Annual Report 2018: Dedicated Grant Mechanism for Indigenous Peoples and Local Communities.* Washington, D.C. Available at https://www.climateinvestmentfunds.org/sites/cif_enc/files/knowledge-documents/dgm-global-annual-report-2018.pdf

Climate Investment Funds (2021). *About CIF*. Washington, D.C. Available at https://www.climateinvestmentfunds.org/about

Colenbrander, Sarah, and others (2023). *The new collective quantified goal and its sources of funding: Operationalising a collective effort. Working paper.* London: Overseas Development Institute. Available at https://media.odi.org/documents/ODI_The_new_collective_quantified_goal_and_sources_of_funding.pdf

Colenbrander, Sarah, David Dodman and Diana Mitlin (2018). *Using climate finance to advance climate justice: the politics and practice of channelling resources to the local level.* Climate policy, vol. 18, issue 7, pp. 902–915. Available at https://doi.org/10.1080/14693062.2017.1388212

Environment Investment Fund of Namibia (2016). *Funding Proposal: Climate Resilient Agriculture in Three of the Vulnerable Extreme Northern Crop Growing Regions (FP023).* November. Windhoek. Available at: https://www.greenclimate.fund/sites/default/files/document/funding-proposal-fp023-eif-namibia.pdf

Environment Investment Fund of Namibia (2018). *Annual Performance Report: Calendar Year 2018 – FP023.* February. Windhoek. Available at: https://www.greenclimate.fund/sites/default/files/document/2018apr-fp023.pdf

Environment Investment Fund of Namibia (2021a). *Midterm Review Report: Climate Resilient Agriculture in Three of the Vulnerable Extreme Northern Crop Growing Regions (FP023).* January. Windhoek. Internal document.

Environmental Investment Fund of Namibia (2021b). *Annual Performance Report: Calendar Year 2020 – FP024.* February. Windhoek. Available at: https://www.greenclimate.fund/sites/default/files/document/fp024-annual-performance-report-cy2020.pdf

Environment Investment Fund of Namibia (2023). *Annual Performance Report: Calendar Year 2022 – FP023.* October. Windhoek. Available at: https://www.greenclimate.fund/sites/default/files/document/fp023-annual-performance-report-cy2022-v.pdf

Food and Agriculture Organization of the United Nations. (2020). *Côte d'Ivoire : Promouvoir la résilience des moyens de subsistance ruraux et des forêts grâce à la mise en œuvre de la REDD+ (PROMIRE) – Funding Proposal.* Rome. Available at: https://www.greenclimate.fund/sites/default/files/document/sap015-fao-cote-divoire.pdf

Food and Agriculture Organization of the United Nations. (2021a). *Annual Performance Report: Calendar Year 2021 – SAP015.* Rome. Available at: https://www.greenclimate.fund/sites/default/files/document/sap015-annual-performance-report-cy2021-v.pdf

Food and Agriculture Organization of the United Nations. (2021b). *Mid-Term Review of FAO-GEF Project GCP/LAO/022/LDF: Climate Change Adaptation in Wetlands Areas (CAWA) in Lao PDR.* Vientiane. Available at: GEFID-5489-MTR-FAO-Lao PDR

Food and Agriculture Organization of the United Nations. (2022). *Annual Performance Report: Calendar Year 2022 – SAP015.* Rome, Food and Agriculture Organization of the United Nations. Available at: https://www.greenclimate.fund/sites/default/files/document/sap015-annual-performance-report-cy2022-v.pdf

Food and Agriculture Organization of the United Nations. (2023). *Annual Performance Report: Calendar Year 2023 – SAP015.* Rome. Available at: https://www.greenclimate.fund/sites/default/files/document/sap015-annual-performance-report-cy2023.pdf

Food and Agriculture Organization of the United Nations. (2024). *Midterm Evaluation Report – PROMIRE (SAP015).* Rome. Internal document.

Fondo Mexicano para la Conservación de la Naturaleza (FMCN). (2021) *Report: SAP023 – River Restoration for Climate Change Adaptation (RIOS).* Mexico City: FMCN. Available at: https://www.greenclimate.fund/sites/default/files/document/sap023-annual-performance-report-cy2021-v.pdf

Fondo Mexicano para la Conservación de la Naturaleza (FMCN). (2021). *Funding Proposal SAP023: River Restoration for Climate Change Adaptation (RIOS).* Mexico City, Mexico: Fondo Mexicano para la Conservación de la Naturaleza. Available at: https://www.greenclimate.fund/sites/default/files/document/funding-proposal-sap023.pdf

Fondo Mexicano para la Conservación de la Naturaleza (FMCN). (2022). *Annual Performance Report CY2022: SAP023 River Restoration for Climate Change Adaptation (RIOS).* Mexico City, Mexico: Fondo Mexicano para la Conservación de la Naturaleza. Available at: https://www.greenclimate.fund/sites/default/files/document/sap023-annual-performance-report-cy2022-v.pdf

Fondo Mexicano para la Conservación de la Naturaleza (FMCN). (2023). *Annual Performance Report CY2023: SAP023 River Restoration for Climate Change Adaptation (RIOS).* Mexico City, Mexico: Fondo Mexicano para la Conservación de la Naturaleza. Available at: https://www.greenclimate.fund/sites/default/files/document/sap023-annual-performance-report-cy2023.pdf

Garschagen, Matthias, and Deepal Doshi (2022). *Does funds-based adaptation finance reach the most vulnerable countries? Global Environmental Change*, vol. 73: 102450. Available at https://doi.org/10.1016/j.gloenvcha.2021.102450.

Gavi, the Vaccine Alliance (2018). *Fragility, Emergencies and Displaced Populations (FEDP) Policy.* Approved by the Gavi Board on 28 November 2018. Geneva. Available at https://www.gavi.org/sites/default/files/document/2018/Gavi-FEDP-policy.pdf

Gavi, the Vaccine Alliance (2022). *Fragility, Emergencies and Displaced Populations (FEDP) Policy – Version 4.0.* December. Geneva. Available at https://www.gavi.org/sites/default/files/document/2022/FEDP-Policy-Version-4.0.pdf

Gavi, the Vaccine Alliance (2023). *Progress Report 2023.* Geneva. Available at https://www.gavi.org/sites/default/files/document/2023/Gavi-Progress-Report-2023.pdf

Gavi, the Vaccine Alliance (2025). *Gavi Board.* Geneva. Available at https://www.gavi.org/about/governance/gavi-board (accessed July 2025)

Global Environment Facility Independent Evaluation Office (2020). The GEF in a Changing World: OPS7 Summary Report. May. Washington, D.C. Available at https://www.thegef.org/publications/seventh-comprehensive-evaluation-gef

Global Environment Facility (2017). *Guidelines on the Project and Program Cycle Policy.* Council Document GEF/C.52/Inf.06/Rev.01, May. Washington, D.C. Available at https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.52.Inf_.06.Rev_.01_Guidelines_on_the_Project_and_Program_Cycle_Policy.pdf

Global Environment Facility (2022). *Progress Report on the Least Developed Countries Fund and the Special Climate Change Fund.* Council Document GEF/LDCF.SCCF.32/03, 10 May. Washington, D.C. Available at https://www.thegef.org/council-meeting-documents/ldcf-sccf-progress-report

Global Environment Facility (2023). *Least Developed Countries Fund (LDCF).* Washington, D.C. Available at https://www.thegef.org/what-we-do/topics/least-developed-countries-fund-ldcf

Global Environment Facility (2025). *The GEF Council.* Washington, D.C. Available at https://www.thegef.org/about/council (accessed July 2025)

Godfrey Ruiz, Claudia (2021). *Interim Evaluation Report: Building the Resilience of Wetlands in the Province of Datem del Marañon, Peru (FP001).* February. Lima, Peru: PROFONANPE. Internal Document

Green Climate Fund (2011). *Governing Instrument.* Songdo, South Korea. Available at https://www.greenclimate.fund/document/governing-instrument.

Green Climate Fund (2013). *GCF/B.05/03: Business Model Framework: Results Management Framework.* 19 September 2013. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b05-03

Green Climate Fund (2014a). *Decision B.07/02, annex I: Initial guiding framework for the Fund's accreditation process.* 21 May 2014. Songdo, South Korea. Available at https://www.greenclimate.fund/decision/b07-02

Green Climate Fund (2014b). *Decision B.07/04: Initial results management framework of the Fund.* 21 May 2014. Songdo, South Korea. Available at https://www.greenclimate.fund/decision/b07-04

Green Climate Fund (2014c). *Decision B.08/02, annex I: Guidelines for the operationalization of the fit-for-purpose accreditation approach.* 17 October 2014. Songdo, South Korea. Available at https://www.greenclimate.fund/decision/b08-02

Green Climate Fund (2014d). *Decision B.08/07: Initial results management framework of the Fund.* 17 October 2014. Songdo, South Korea. Available at https://www.greenclimate.fund/decision/b08-07

Green Climate Fund (2014e). *GCF/B.07/02: Guiding Framework and Procedures for Accrediting National, Regional and International Implementing Entities and Intermediaries, Including the Fund's Fiduciary Principles and Standards and Environmental and Social Safeguards.* 07 May 2014. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b07-02

Green Climate Fund (2014f). *GCF/B.07/06: Investment Framework.* 09 May 2014. Available at https://www.greenclimate.fund/document/gcf-b07-06

Green Climate Fund (2014g). *GCF/B.08/02: Guidelines for the Operationalization of the Fit-for-purpose Accreditation Approach.* 05 October 2014. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b08-02

Green Climate Fund (2014h). *GCF/B.08/06: Application Documents for Submissions of Applications for Accreditation.* 05 October 2014. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b08-06

Green Climate Fund (2014i). *GCF/B.08/11: Financial Terms and Conditions of Grants and Concessional Loans.* 07 October 2014. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b08-11

Green Climate Fund (2015). *GCF/B.09/05: Additional Modalities that Further Enhance Direct Access: Terms of Reference for a Pilot Phase.* 05 March 2015. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b09-05

Green Climate Fund (2016a). *GCF/B.13/21: Policies on ethics and conflicts of interest for other Board appointed officials and active observers*. 08 June 2016. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b13-21

Green Climate Fund (2016b). *GCF/B.13/14: Operational guidelines for the Project Preparation Facility.* 23 June 2016. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b13-14

Green Climate Fund (2017a). *GCF/B.18/06: Request for proposals for the pilot programme for REDD-plus results-based payments.* 28 September 2017. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b18-06

Green Climate Fund (2017b) *Decision B.18/06: Policy matters related to the approval of funding proposals: Simplified approval process for certain small-scale activities,* 2 October 2017, Cairo, Egypt. Available at: https://www.greenclimate.fund/decision/b18-06

Green Climate Fund (2018). *Accreditation Master Agreement between the Green Climate Fund and World Food Programme.* Incheon: GCF. Available at: https://www.greenclimate.fund/document/ama-wfp

Green Climate Fund (2019a). *GCF/B.22/13: Policy on Prohibited Practices.* 01 February 2019. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b22-13

Green Climate Fund (2019b). *SAP007 Project Page.* Songdo, South Korea. Available at https://www.greenclimate.fund/project/sap007

Green Climate Fund (2019c). *SAP011 Project Page.* Songdo, South Korea. Available at https://www.greenclimate.fund/project/sap011

Green Climate Fund (2019d). *GCF in Brief: Simplified Approval Process.* October. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-brief-simplified-approval-process

Green Climate Fund (2020a). *Project Preparation Facility (PPF) Guidelines: A detailed guide on how to prepare Project Preparation Facility applications for the Green Climate Fund.* October.

Songdo, South Korea. Available at https://www.greenclimate.fund/sites/default/files/document/ppf-guidelines_1.pdf.

Green Climate Fund (2020b). *GCF/B.27/04: 2021 work programme of the Secretariat and annual administrative budget of the GCF Secretariat, Board and Trustee.* 22 October 2020. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b27-04

Green Climate Fund (2021a). *Decision B.30/02: Independent assessment of the GCF's Simplified Approval Process Pilot Scheme.* 07 October 2021. Songdo, South Korea. Available at https://www.greenclimate.fund/decision/b30-02

Green Climate Fund (2021b). *GCF/B.28/04: Addressing gaps in the current portfolio for measurement.* 23 February 2021. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b28-04

Green Climate Fund (2021c). *GCF/B.29/06: Updated accreditation framework.* 08 June 2021. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b29-06

Green Climate Fund (2021d). *GCF/B.29/12: Integrated Results Management Framework.* 25 June 2021. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b29-12

Green Climate Fund (2021e). *GCF/B.30/09: 2022 work programme of the Secretariat and annual administrative budget of the GCF Secretariat, Board and Trustee.* 24 September 2021. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b30-09

Green Climate Fund (2021f). *GCF/B.30/10: Independent Redress Mechanism Work Plan and Budget for 2022.* 27 September 2021. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b30-10

Green Climate Fund (2022a). *GCF handbook: Decisions, policies and frameworks (updated March 2022).* Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-handbook.

Green Climate Fund (2022b). *Guidance note to support the completion of the IRMF elements of the revised funding proposal template for PAP and SAP.* Songdo, South Korea. Available at https://www.greenclimate.fund/document/guidance-note-support-completion-irmf-elements-revised-funding-proposal-template-pap-and.

Green Climate Fund (2022c). *Decision B.31/06: Matters related to accreditation.* 31 March 2022. Songdo, South Korea. Available at https://www.greenclimate.fund/decision/b31-06

Green Climate Fund (2022d). *Decision B.32/05, annex IV: Updated simplified approval process and activity cycle.* 19 May 2022. Songdo, South Korea. Available at https://www.greenclimate.fund/decision/b32-05 \

Green Climate Fund (2022e). *Update of the simplified approval process* 25 April 2022. Antigua and Barbuda. Available at: https://www.greenclimate.fund/sites/default/files/document/gcf-b32-05.pdf

Green Climate Fund (2022f). *Decision B.34/19: Accreditation strategy.* 14 November 2022. Songdo, South Korea. Available at https://www.greenclimate.fund/decision/b34-19

Green Climate Fund (2022g). *GCF/B.33/07: Readiness and Preparatory Support Programme – work programme and budget 2022–2023.* 24 June 2022. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b33-07

Green Climate Fund (2022h). *GCF/B.34/Inf.10, annex VIII: Management Action Report on the Independent Assessment of the GCF's Simplified Approval Process Pilot Scheme.* Songdo,

South Korea. Available at https://www.greenclimate.fund/sites/default/files/document/gcf-b34-inf10.pdf

Green Climate Fund (2023a). *GCF/B.36/17/Rev.01: Green Climate Fund - Strategic Plan 2024-2027.* 09 July 2023. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b36-17-rev01

Green Climate Fund (2023b). *GCF/B.37/17: Readiness and Preparatory Support Programme: revised strategy 2024–2027.* 17 October 2023. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b37-17

Green Climate Fund (2023c). *GCF/B.37/22: Update of the initial investment framework: allocation parameters and portfolio targets for 2024–2027.* 21 October 2023. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b37-22

Green Climate Fund (2024). *GCF/B.40/15: Accreditation Framework.* 04 October 2024. Songdo, South Korea. Available at https://www.greenclimate.fund/document/gcf-b40-15

Green Climate Fund (2025a). *Portfolio Dashboard.* Songdo, South Korea. Available at https://www.greenclimate.fund/projects/dashboard (accessed July 2025)

Green Climate Fund (2025b). *Governance.* Songdo, South Korea. Available at https://www.greenclimate.fund/about/governance (accessed July 2025)

Kalinowski, Thomas (2023*). The Green Climate Fund and private sector climate finance in the Global South. Climate Policy*, vol. 24, issue 3, pp. 281–296. Available at https://doi.org/10.1080/14693062.2023.2276857.

Independent Evaluation Unit (2018). *Independent review of the Green Climate Fund's results management framework.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/230321-rmf-review-main-report-2-column-top-web-isbn.pdf

Independent Evaluation Unit (2019a). *Forward-looking performance review of the Green Climate Fund.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/fpr-final-report.pdf

Independent Evaluation Unit (2019b). *Independent evaluation of the Green Climate Fund's country ownership approach.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/200203-coa-final-report-no-decision-page.pdf

Independent Evaluation Unit (2020a). *Independent evaluation of the Green Climate Fund's environmental and social safeguards and the environmental and social management system.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/ess-final-report-english.pdf

Independent Evaluation Unit (2020b). *Independent synthesis of the Green Climate Fund's accreditation function.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/accreditation-final-report.pdf

Independent Evaluation Unit (2020c). *Independent evaluation of the relevance and effectiveness of the Green Climate Fund's investments in Small Island Developing States.* Evaluation Report.

Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/230330-sids-final-report-top-web-isbn.pdf

Independent Evaluation Unit (2020d). *Independent Evaluation of the GCF's Simplified Approval Process Pilot Scheme.* Final Report (October). Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/230330-sap-review-final-report-top-web-isbn.pdf

Independent Evaluation Unit (2021a). *Independent evaluation of the adaptation portfolio and approach of the Green Climate Fund.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/210223-adaptation-final-report-top.pdf

Independent Evaluation Unit (2021b). *Independent rapid assessment of the Green Climate Fund's request for proposals modality.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/230330-rfp-final-report-2ed-top-web-isbn.pdf

Independent Evaluation Unit (2021c). *Independent evaluation of the Green Climate Fund's approach to the private sector.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/230330-priv-final-report-vol-i-top-web-isbn.pdf

Independent Evaluation Unit. (2021d). *Independent Evaluation of the Green Climate Fund's Simplified Approval Process Pilot Scheme (SAP):* Final Report. Incheon, South Korea: Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/230330-sap-review-final-report-top-web-isbn.pdf

Independent Evaluation Unit (2022). *Independent evaluation of the relevance and effectiveness of the Green Climate Fund's investments in the Least Developed Countries.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/230330-ldcs-final-report-vol-i-top-web-isbn.pdf

Independent Evaluation Unit (2023a). *Second performance review of the Green Climate Fund.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/230331-spr-final-report-top-web-isbn.pdf

Independent Evaluation Unit (2023b). *Independent evaluation of the relevance and effectiveness of the Green Climate Fund's investments in the African States.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/230406-afr-final-report-3rd-ed-top-web-isbn_0.pdf

Independent Evaluation Unit (2023c). *Independent synthesis of direct access in the Green Climate Fund. Final report* (February). Songdo, South Korea. Available at https://ieu.greenclimate.fund/document/final-report-independent-synthesis-direct-access-green-climate-fund.

Independent Evaluation Unit (2023d). *Independent evaluation of the GCF's Readiness and Preparatory Support Programme. Executive summary* (September). Songdo, South Korea. Available at https://ieu.greenclimate.fund/sites/default/files/evaluation/231005-rpsp-ex-sum-top-web.pdf.

Independent Evaluation Unit (2023e). *Independent synthesis of the GCF's Accreditation function (Accred2020).* Songdo, South Korea. Available at https://ieu.greenclimate.fund/sites/default/files/document/accreditation-final-report.pdf

Independent Evaluation Unit (2024a). *Independent evaluation of the Green Climate Fund's energy sector portfolio and approach.* Evaluation Report. Songdo, South Korea: Independent Evaluation Unit, Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/independent-evaluation-gcfs-energy-sector-portfolio-and-approach-final-report.pdf

Independent Evaluation Unit (2024b). *IEU synthesis on access in the GCF* (June). Available at https://ieu.greenclimate.fund/sites/default/files/document/20240621-access-synthesis-web.pdf.

Independent Evaluation Unit (2024c). *LORTA Impact Evaluation Midline Report for FP026 – Sustainable Landscapes for Eastern Madagascar.* Incheon: Green Climate Fund. Available at: https://ieu.greenclimate.fund/sites/default/files/document/240215-lorta-midline-report-madagascar-top.pdf

Independent Evaluation Unit (2025). *LORTA Synthesis Report 2024*. Incheon: Green Climate Fund. Available at https://ieu.greenclimate.fund/sites/default/files/document/2024-lorta-synthesis-report.pdf

Manuamorn, Ornsaran Pomme, and Robbert Biesbroek (2020). *Do direct-access and indirect-access adaptation projects differ in their focus on local communities? A systematic analysis of 63 Adaptation Fund projects. Regional Environmental Change*, vol. 20, No. 139. Available at https://link.springer.com/article/10.1007/s10113-020-01716-4.

Mfune, Joseph K.E. and Kabelo Thekwane (2023). *Final Independent Evaluation Report: Empower to Adapt (FP024).* June. Windhoek. Available at: https://www.greenclimate.fund/sites/default/files/document/fp024-final-independent-evaluation-report.pdf

Osuna, Andrea Rodriguez (2022). *Accessing UNFCCC-linked multilateral climate funds: lived experiences. Part of the Financing Climate Action: iGST Discussion Series.* Available at https://www.climateworks.org/wp-content/uploads/2022/11/iGST_Access-to-Climate-Finance_Nov2022.pdf.

Palli Karma-Sahayak Foundation (2019). *SAP008: Extended Community Climate Change Project–Flood (ECCCP–Flood) – Funding Proposal.* Dhaka, Bangladesh: Palli Karma-Sahayak Foundation. Available at: https://www.greenclimate.fund/document/extended-community-climate-change-project-flood-ecccp-flood

Palli Karma-Sahayak Foundation (2021). *Annual Performance Report: Calendar Year 2021 – SAP008.* Dhaka. Available at: https://www.greenclimate.fund/sites/default/files/document/sap008-annual-performance-report-cy2021-v.pdf

Palli Karma-Sahayak Foundation (2023). *Annual Performance Report: Calendar Year 2023 – SAP008.* Dhaka. Available at: https://www.greenclimate.fund/sites/default/files/document/sap008-annual-performance-report-cy2023.pdf

PROFONANPE (2015). *Funding Proposal: Building the Resilience of Wetlands in the Province of Datem del Marañón, Peru (FP001).* November. Lima. Available at: https://www.greenclimate.fund/sites/default/files/document/funding-proposal-fp001-profonanpe-peru.pdf

PROFONANPE (2023). *Annual Performance Report: Calendar Year 2023 – FP001.* February. Lima. Available at: https://www.greenclimate.fund/sites/default/files/document/fp001-annual-performance-report-cy2023-projects-programme-approved-under-pmfs-v.pdf

Ratner, B. D., Mora Reguera, F., & Torres Márquez, N. A. (2024). *Mid-Term Evaluation: River Restoration for Climate Change Adaptation (RIOS) Project.* Mexico City, Mexico. Internal document.

Technical Evaluation Reference Group (2017). *Results from Study Area 3 of the Five-Year Evaluation – Organizational Effectiveness of the Global Fund.* Geneva: Tha Global Fund. Available at https://archive.theglobalfund.org/media/2978/archive_terg-sa3_report_en.pdf

The Global Fund to Fight AIDS, Tuberculosis and Malaria (2016). *The Global Fund Policy on Challenging Operating Environments.* June. Geneva. Available at https://www.theglobalfund.org/media/4221/core_coepolicy_guidancenote_policy_en.pdf

The Global Fund to Fight AIDS, Tuberculosis and Malaria (2017). *Operational Policy Note: Challenging Operating Environments (COEs).* GF/OPEX/OPN/COE, March. Geneva. Available at https://resources.theglobalfund.org/media/13829/cr_challenging-operating-environments-manual_opn_en.pdf

The Global Fund to Fight AIDS, Tuberculosis and Malaria (2022a). *Global Fund Governance Handbook: An Introduction to the Structures, Roles and Responsibilities of the Global Fund Governance System.* April. Geneva. Available at https://www.theglobalfund.org/media/1228/core_globalfundgovernancehandbook_handbook_en.pdf

The Global Fund to Fight AIDS, Tuberculosis and Malaria (2022b). *Annual Results Report 2022.* Geneva. Available at https://www.theglobalfund.org/media/12083/corporate_2022resultsreport_report_en.pdf

United Nations Development Programme (2020). *Funding Proposal: Enhancing Multi-Hazard Early Warning System to Increase Resilience of Uzbekistan Communities to Climate Change Induced Hazards (SAP022).* New York. Available at: https://www.greenclimate.fund/sites/default/files/document/funding-proposal-sap022.pdf

United Nations Development Programme. (2023). *SAP022 Midterm Report: Enhancing Multi-Hazard Early Warning System to Increase Resilience of Uzbekistan Communities to Climate Change Induced Hazards.* Tashkent. Internal document.

United Nations Development Programme. (2024). *Annual Performance Report CY2023: Enhancing Multi-Hazard Early Warning System to Increase Resilience of Uzbekistan Communities to Climate Change Induced Hazards (SAP022).* New York. Available at: https://www.greenclimate.fund/sites/default/files/document/sap022-annual-performance-report-cy2023.pdf

United Nations Environment Programme. (2019). *Funding Proposal: Building Resilience of Urban Populations with Ecosystem-based Solutions in Lao PDR (SAP009).* Nairobi. Available at: https://www.greenclimate.fund/sites/default/files/document/funding-proposal-sap009-unep-lao-people-s-democratic-republic.pdf

United Nations Environment Programme. (2020). *Annual Performance Report: Building Resilience of Urban Populations with Ecosystem-based Solutions in Lao PDR, CY2020 (SAP009)*. Nairobi. Available at: https://www.greenclimate.fund/sites/default/files/document/sap009-annual-performance-report-cy2020.pdf

United Nations Environment Programme. (2021). *Annual Performance Report: Building Resilience of Urban Populations with Ecosystem-based Solutions in Lao PDR, CY2021 (SAP009)*. Nairobi. Available at: https://www.greenclimate.fund/sites/default/files/document/sap009-annual-performance-report-cy2021-v.pdf

United Nations Environment Programme. (2022). *Annual Performance Report: Building Resilience of Urban Populations with Ecosystem-based Solutions in Lao PDR, CY2022 (SAP009)*. Nairobi. Available at: https://www.greenclimate.fund/sites/default/files/document/sap009-annual-performance-report-cy2022-v.pdf

United Nations Environment Programme. (2023). *Annual Performance Report: Building Resilience of Urban Populations with Ecosystem-based Solutions in Lao PDR, CY2023 (SAP009)*. Nairobi. Available at: https://www.greenclimate.fund/sites/default/files/document/sap009-annual-performance-report-cy2023.pdf

World Bank, (2017), *Implementation Completion and Results Report: Community Climate Change Project,* Washington, D.C. Available at: https://documents1.worldbank.org/curated/en/277981504638164950/pdf/ICR00004072-08222017.pdf

World Bank. (2023). *Implementation Completion and Results Report: Central Asia Hydrometeorology Modernization Project (P120788).* Washington, DC. Available at: https://documents1.worldbank.org/curated/en/099112923140020861/pdf/BOSIB045d7ba110500b01606a62746c1573.pdf

World Food Programme (2017). *FP067: Building Climate Resilience of Vulnerable and Food Insecure Communities Through Capacity Strengthening and Livelihood Diversification in Mountainous Regions of Tajikistan – Funding Proposal*. Incheon, South Korea: Green Climate Fund. Available at: https://www.greenclimate.fund/sites/default/files/document/funding-proposal-fp067-wfp-tajikistan.pdf

World Food Programme (2017). *Funding Proposal: Building the Climate Resilience of Food Insecure Smallholder Farmers Through Integrated Management of Climate Risk (FP049)*. October. Rome. Funding proposal: https://www.greenclimate.fund/sites/default/files/document/funding-proposal-fp049-wfp-senegal.pdf

World Food Programme (2017). *R4 Rural Resilience Initiative: Annual Report 2017*. Rome. Available at: https://s3.amazonaws.com/oxfam-us/www/static/media/files/R4_AR_2017_US_letter_10april.pdf

World Food Programme (2019). *SAP007: Integrated Climate Risk Management for Food Security and Livelihoods in Zimbabwe Focusing on Masvingo and Rushinga Districts – Funding Proposal*. Harare. Available at: https://www.greenclimate.fund/document/integrated-climate-risk-management-food-security-and-livelihoods-zimbabwe-focusing-masvingo

World Food Programme (2019). *SAP011: Climate-Resilient Food Security for Women and Men Smallholders in Mozambique Through Integrated Risk Management – Funding Proposal*. Maputo. Available at: https://www.greenclimate.fund/sites/default/files/document/funding-proposal-sap011-wfp-mozambique.pdf

World Food Programme (2021). *Annual Performance Report: Calendar Year 2021 – SAP011*. Maputo. Available at: https://www.greenclimate.fund/sites/default/files/document/sap011-annual-performance-report-cy2021-v.pdf

World Food Programme (2022). *Annual Performance Report: Calendar Year 2022 – SAP011*. Maputo. Available at: https://www.greenclimate.fund/sites/default/files/document/sap011-annual-performance-report-cy2022-v.pdf

World Food Programme (2023). *Annual Performance Report: Calendar Year 2023 – SAP007*. Harare, Zimbabwe: WFP.

World Food Programme (2023). *Annual Performance Report: Calendar Year 2023 – SAP011*. Maputo. Available at: https://www.greenclimate.fund/sites/default/files/document/sap011-annual-performance-report-cy2023.pdf

World Food Programme (2024). *Annual Performance Report 2023 – FP067: Building Climate Resilience of Vulnerable and Food Insecure Communities Through Capacity Strengthening and Livelihood Diversification in Mountainous Regions of Tajikistan*. Dushanbe. Available at: https://www.greenclimate.fund/sites/default/files/document/fp067-annual-performance-report-cy2023.pdf

World Food Programme (2024). *Annual Performance Report: Calendar Year 2023 – FP049*. February. Rome. Available at: https://www.greenclimate.fund/sites/default/files/document/fp049-annual-performance-report-cy2023.pdf

World Food Programme (n.d.). *The R4 Rural Resilience Initiative*. Rome, Italy: WFP.

World Food Programme/Oxfam America (2019), *R4 Rural Resilience Initiative Quarterly Report, April-June 2019.* Rome. Available at: https://docs.wfp.org/api/documents/WFP-0000107879/download/?_ga=2.14804275.464918376.1756994662-985067486.1747219801

Zakari Saley Bana and Mathilde Henry (2022). *Interim Review of the Project (FP049): Building the climate resilience of food insecure smallholder farmers through integrated management of climate risks (the R4 Rural Resilience Initiative) in Senegal*. Independent Consultants, May 2022. Internal report.