

Pacific Experiences on working on accreditation for the Green Climate Fund and the Adaptation Fund

Deliverable for GIZ: Contract No. 83361163

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Summary of views from the discussions and review of meeting literature

In undertaking the interviews and analysis for this paper, there has been a few common inputs from interviews, meeting outcomes and written analysis. These include:

- A desire to directly access funding from the AF and GCF.
- An understanding that accreditation can be a long process with multiple levels of reform, redrafting and institutional building (such as new procedures, and policies, such as those for gender).
- Entities seeking accreditation need to invest time in learning the requirements and meeting the standards, careful consultation and understanding the countries climate change priorities.
- Delays often relate to resourcing, time required for following the process and assessment of the best partner for becoming an NIE/AE.
- There is a lot of value of the process in strengthening policy, priorities (such as pipelines and plans), institutions (supporting national ownership) and PFM systems (promoting confidence amongst partners).

Reflections on Current Experience in the Pacific

Our Government is constantly looking for innovative ways to grow Fiji's economy and protect us from the effects of climate change — FDB's new GCF accreditation helps us simultaneously progress both of those goals. We will continue to work to bring Fijians sustainable prosperity and by doing so, we hope that Fiji can serve as a success story that other developing nations and climate-vulnerable economies can replicate. With FDB's accreditation, we can further work with our Pacific neighbors to mobilize climate finance within the region.

*Aiyaz Sayed-Khaiyum
Attorney-General and Minister for Economy — Fiji
Press release, Suva, Fiji, November 2017*

Introduction

Pacific island countries need significant amounts of finance to help them adapt to the changing climate and follow a path of low-carbon development. The international community has set up multilateral funds to help support climate change mitigation and adaptation in these nations. Two of the largest climate funds, the Adaptation Fund (AF) and the Green Climate Fund (GCF), have committed to allowing institutions from developing countries to seek direct access to finance. *Direct access* in this context means that national or subnational entities can become accredited to receive finance directly from the funds without going through an intermediary (like a Multilateral Development Bank or a regional entity). The goal of such direct access is, among other things, to reduce transaction costs and enhance national ownership over available financing. The following reflects on a range of view and experiences on the accreditation process from the Pacific and other Small Island States and Less Developed Countries.

Why pursue this?

There has been regular decisions by Forum Economic Ministers and Leaders¹ to seek improved and simplified access to climate change finance.² While not the only way to access climate finance, direct access to climate finance can have multiple benefits. Beyond supporting country ownership, the process of arranging for and implementing such access can help strengthen national institutions in countries, such as the experience in the Cook Islands, Micronesian Conservation Trust and the Fiji Development Bank. Although the accreditation processes

¹ Most recently from the 2019 FEMM.

² There is no single definition of climate finance, the Standing Committee on Finance, which defines it as:

“finance that aims at reducing emissions, and enhancing sinks of greenhouse gases and aims at reducing vulnerability of, and maintaining and increasing the resilience of, human and ecological systems to negative climate change impacts.”

This definition represents finance for climate change in its broadest form as it relates to the flow of funds to all activities, programmes or projects that support climate change related projects, whether mitigation or adaptation, anywhere in the world. This broadness has arisen because there are many different elements that need to be considered, these include: the type of finance provided (development aid, private equity, loans, or concessional finance); the source of the finance (is it from public or private sources); where the finance flows from (developed countries to developing countries, within developed or developing nations, developing to developed nations or from other sources such as multilateral development banks); if this finance is over and above what would have been provided anyway (“new and additional”); and what is ultimately financed (direct or indirect climate change related actions, or compensation for damages).

require applicants to undergo rigorous assessments focused on how they meet relevant fiduciary, environmental, and social standards, most of the countries and AEs/NIEs that have undergone this process report that the scrutiny has helped strengthen their ability to perform effectively (PNG/USAID meeting report 2020).

According to Masullo et al. (2015), direct access can in some cases also enhance efficiency. Allowing national institutions to access finance without an international intermediary can potentially reduce the number of actors involved in transactions, and thus overall costs and coordination challenges. According to the Adaptation Fund Board Secretariat, international intermediaries have generally experienced longer delays in project inception compared to their national counterparts (Adaptation Fund 2018).

Are there any Drawbacks to Direct Access?

While direct access can improve the results of climate finance, it also entails challenges. When international funds use multilateral or bilateral institutions to manage the implementation of funded activities, they do so because these institutions are known entities with relatively strong systems for financial, environmental, and social risk management. National entities, in contrast, may have had fewer opportunities to showcase their competence and independence in these areas.

Hence, national institutions may need to undergo significant institutional reconfiguration to meet the relevant standards and this can stretch out the accreditation process and then pipelines for projects. In reviewing the experiences of those SIDS that have been accredited, this can be tedious and expensive, particularly for those that cannot immediately meet the requirements without additional investment of financial and human resources. As a result, those agencies that have undertaken this process have progressed through several internal stages of consideration and analysis prior to undertaking accreditation (Masullo et al. 2015). While others may continue to work with multilateral and regional partners it is about matching national priorities with national capabilities. As a result, the decision to progress accreditation for a local entity is not made rashly.

Perceptions on Accreditation with the Adaptation Fund and/or Green Climate Fund

The next few sections reflect on views in relation to accreditation, they include issues such as: support provided by the GCF and AF; project development and approval experience (this draws a lot of external experience from outside the region); implementation; stakeholder management; and an overall assessment of the costs from being involved in the process.

Accreditation process: In retrospect AEs/NIEs identified capacity-related challenges as the greatest barrier. According to interviewees and review of other papers, there is a significant need for time to develop these capacities before the accreditation process is undertaken. Moreover, the duration of the process was identified as a problem, as were certain underlying problems (such as change of government and loss of key staff members). Other major challenges named by the interviewees was the lack of ability to meet fiduciary standards, in particular the demonstration of measures and policies in place to promote transparency and combat corruption. When asked about any enabling factors that could guide AEs/NIEs still in the process of accreditation, AEs/NIEs highlighted that those are to be found both inside the AEs/NIEs (for example, experience in project development, management and implementation) and outside the reach of the AEs/NIEs themselves, namely domestic support and a committed NDA/DA. Respondents urged the need for participation of key institutions, stakeholders and

forums in the selection process – ideally through a national climate change committee – in part to avoid claims of political interference. In addition to institutional capacity-building as a direct positive impact of the accreditation process, respondents noted that accreditation had significant indirect co-benefits for catalysing and revitalising consideration of national priorities on mitigation and adaptation at the country level moreover, helping to revitalise commitment to good governance and existing national adaptation plans.

In the Pacific, only the Cook Islands Ministry of Finance and Economic Management (MFEM), the Tuvalu Ministry of Finance and Economic Development (MFED) and the Fiji Development Bank (FDB) have undertaken the national accreditation processes for either the AF/GCF or both. Some of the specific observations of that experience included:

- Resource/Capacity constraints and thus needing to set realistic timeframes.
- Building capability and capacity through utilising TA resources.
- Timing is critical as the process requires many different processes to be underway simultaneously and it is a challenge to ensure that they are fully implemented or have evidence of progress to the AF/GCF and partners.
- Complexity of the process and the need to ensure that the process is understood and questions asked for issues to be clarified.

Adequacy of support by the AF/GCF during the accreditation process: AEs/NIEs perceived the assistance from the AF/GCF, such as meetings, remote support and calls by the GCF/AF as helpful in navigating the strict requirements and high volume of support in documentation requested. AEs/NIEs also indicated that the GCF/AF website was a good resource, providing a lot of information. However, some have noted that the structure of the website could be overworked as information was sometimes hard to find. Interviews revealed that weaknesses exist mainly in regard to the process' duration as well as in communication, which can be unclear and inconsistent. It should be noted that some interviewees stated that prospective AEs/NIEs perceived the process to be inflexible and intrusive. Respondents therefore recommended the GCF/AF to be more flexible about what qualifies as sufficient evidence of the application of policies and standards, as this is a challenge for newly established organisations and highly centralised entities that are subject to political changes (for example ministries). They also recommended to streamline the accreditation process so that it is shorter and does not require the involvement of as many people/entities in the recipient countries. It should also be noted, that the size and type of assistance available is different as the GCF has a readiness programme to support the NDA (which the AF has now introduced one as well), which have been operating for a number of years with the aim to strengthen national and regional entities' capacity to receive and manage climate financing as they adapt and build resilience.

Project development and approval process: After achieving accreditation, AEs/NIEs need to prepare for their core task as implementing entities, namely the development and implementation of projects. The post-accreditation stage is a decisive phase for the later success of project development and implementation. In order to be successful, project proponents must show how the activities contribute to resilience, how vulnerable people benefit from the intervention, how they will minimise negative side-effects, how to capture learning, etc. Major challenges lurk in the process, and feedback from the GCF/AF indicate that these are often underestimated by new AEs/NIEs. The post-accreditation phase is, therefore, an important

opportunity for AEs/NIEs to learn from other forerunners to successfully cope with these challenges. Some AEs/NIEs in reviewing the material on experience in other regions, noted that the main challenge of the post-accreditation process was the time lapse between accreditation and proposal endorsement. Some AEs/NIEs expressed their frustration with the fact that undergoing a thorough and time-consuming accreditation process did not result in the immediate disbursement of funds by the GCF/AF. More time, effort and resources had to be channelled into preparing project proposals that had to be approved by the GCF/AF before project financing would be disbursed.

Implementation of approved projects: After projects have been approved, new challenges await the AEs/NIEs. Regarding Pacific AEs, so far only 2 SIDS (Fiji and Antigua and Barbuda) have reached successful approval of a project. The challenges in the implementation phase therefore mainly refer to other AEs/NIEs, in a review of the literature they have reported that they struggled with delays in project implementation, difficulties in coordinating and managing the range of information and people as well as the compliance with the GCF/AF Environmental and Social Standards. Other material examined for this work (Schafer et al 2014) indicated that successful AEs/NIEs highlighted the value of regular meetings, technical committees and executing entities and the establishment of standing steering committee for projects early on as enabling factors. Furthermore, they recommended building on existing structures and using existing capacities effectively and leveraging existing governance and compliance practices to facilitate GCF/AF project implementation and reporting. In general, experience entities took the view that the project implementation phase in particular will be a learning process (Schafer et al 2014). This is important as for many prospective AEs/NIEs, it will be the first time they will have been responsible for projects – therefore, each project will have lessons for others. It is probably important considering that any rushed project design phase (due to lack of funds or other reasons) will later provoke delays in project implementation later on. Similarly, it is important to have realistic expectations at the national level on the time and effort required to progress projects.

Stakeholder consultation and integration: Earlier research (Schafer et al 2014 and Masullo et al. 2015) has shown that including civil society early in the accreditation process is beneficial for later phases of project implementation. Consultation is necessary to understand potential obstacles and risks, define problems and identify their causes, get an overview of existing measures, maximise synergies, avoid duplications and ensure coordination. Consultation may show appropriate strategies and actions to address needs and achieve desired outcomes. Additionally, consultation helps save time, raise awareness, increase the participatory involvement of members of society and the project, to share experiences and knowledge, reduce costs, and improve project performance and impact.

A UNDP 2018 report recommends that early engagement of stakeholders in the accreditation process is also beneficial, particularly in the long term. For the GCF process, early discussions with the NDA will facilitate the process of the NDA granting the letter of nomination as well as familiarize an entity with the unique nomination process required by the NDA. Early conversations with a variety of stakeholders may facilitate project/programme implementation and provide insight on the level of accreditation the entity should seek. Challenges included the expectation management, asking the right questions and the lack of comprehensive guidance from the GCF/AF regarding consultations.

When asked for enabling factors, respondents reported that it is important to ‘adjust the consultation process according to local conditions regarding both selection of stakeholders and modalities of consultation’ and to obtain permission for working at the community level from key authorities. As benefits of the consultation processes, AEs/NIEs highlight the value of awareness raising process for projects at local level, the focus on most vulnerable, the inclusion of local knowledge and expertise and the establishment of a relationship crucial for the later implementation process. Views expressed in the consultation further described meaningful consultation as an opportunity to foresee and/or resolve potential obstacles, constraints and conflicts and distribute benefits equitably.

Costs of participating in the process: Time and resources is a critical element to the commitment of progressing accreditation. For example, UNDP 2018 identified that capacity needed to undertake the accreditation process should not be underestimated. Capacity needs are in terms of: 1) Number of staff working on accreditation and 2) Institutional capacity of the entity to pass the accreditation process. As each round of feedback is time consuming and the timing of the feedback is not known, it is useful to have more than one person working on the accreditation process as well as on stand-by to quickly answer questions and act as feedback is provided. This makes for a major challenge for many PICs who face specific capacity limits. For example, the GCF asks applicants to respond as soon as possible which may be a challenge when key staff are away or communications are unreliable. Institutional capacity can be a major challenge during accreditation. Applicants may need to be prepared to update existing policies/procedures or create new ones. This may require significant time and costs. Feedback from discussions with countries has indicated that the timing and effort required for new processes and standards is often underestimated. For example, Cook Islands in its accreditation had to provide more than 200 new documents for the AF accreditation process (USAID 2020).

In terms of timing, the Cook Islands disputed that their accreditation process took over 700 days (as stated in the GIZ document for this consultancy) but did agree that it took a long time to progress but that there were specific stages as it changed going forward. One key lesson is the capacity, the lesson has been learned with the process to progress accreditation for the Bank of the Cook Islands (BCI). The capability of the BCI since 2019 has moved from 5 persons (3 under MFEM, 2 under CCCI) to now 10. This is made up of 4 under MFEM, 6 under CCCI, plus 3 international advisors. In terms of resources, The BCI has spent about 6 months going through the process and setting up their internal procedures, to date all costs for this were covered under the readiness program, and they are planning that it will cover all accreditation costs. See Box 1 for a rundown of the Cook Islands first accreditation experience.

The literature identifies that the accreditation process has been lengthy and time consuming for all participants. According to Schafer et al (2014), AEs/NIEs have perceived time and money as major challenge in the stakeholder consultation process. The formulation of projects including a wide stakeholder consultation process is expensive and takes time. Respondents described a tension between limited funding and participatory and integrated project design. For the AF, the US\$30,000 provided for project formulation was less than actual cost (covering an estimated 25% of actual costs). There is also a gap between what is offered by the GCF offers in terms of funding and the AF.

Box 1: *The Cook Islands Experience of AF accreditation.*

The Cook Islands started the process of applying to become an NIE in 2012 with the endorsement of the delegated authority of the Ministry of Finance and Economic Management (MFEM). Technical assistance was received from UNDP through an initial assessment of NIE capability to understand gaps in 2012. This was followed by funding from an EU-SPC project to support the employment of TA. TA was also provided by a panel through the Frankfurt School of Finance and Management. Various work to meet the necessary requirements was undertaken with inception and analysis reports being completed and capacity support being provided. This enabled the development of a local Roadmap to build systems and capacity for the MFEM. In terms of its roadmap, gaps were identified in documentation and capacity, they included actions for:

1. Training to familiarise their role of a NIE if accredited.
2. Build long-term climate finance readiness of the Cook Islands to secure domestically and international additional sources of finance for carrying out climate adaptation activities and projects.
3. TA support to build capacity in areas of Anti-corruption, Activity Management, Procurement, and Transparency.

The application was submitted in December 2014 and feedback was received in March 2015, with the final accreditation decision being undertaken by the AFB in July 2016.

Specific issues lessons included:

- Encouraging more training and capacity building in the Pacific on the accreditation process.
- The accreditation process provided an opportunity in strengthening country systems to ensure development partners have confidence in national systems
- Challenges can be overcome, and the NIE status is worth the pursuit as a country continues to build on improved systems and capability in the process leading to a stronger Cook Islands.

Source: various documents and interviews.

It is interesting to note that both the Cook Islands and the Micronesian Conservation Trust were fast tracked by the GCF. For the GCF process, it was highlighted that while they were fast tracked, that process still took time. While considerable amounts of effort had gone into the AF process there were additional issues learnt from the GCF process with the importance of institutional strength and capacity being important. Again in terms of people, in house capacity had to be developed and that required not just one person but needed to have a range of local consultants involved. Additional work was required on policy and procedures. Issues such as knowledge management and investing time in understanding and reading the documentation in the Online Accreditation System (OAS) was important. There is a good level of understanding that readiness support can be helpful not just for the NDA but also for prospective AEs to learn and build capacity. For the Cook Islands, there was also value in exchanges and meetings with other countries and bodies undertaking the process to enable the exchange of knowledge and information. International consultants were engaged as experts to support key technical parts of the necessary work.

GCF and Adaptation Fund Perceptions on the support provide and experience of countries

Reviewing the material and reflecting on recent webinars and discussions with AF and GCF staff, there has been universal agreement that the GCF and AF are willing to support processes in undertaking accreditation in the Pacific. Some of the main issues they have identified for countries has been picking the appropriate level of finance, type of financial instruments, understanding environmental and social safeguards and project management processes. In general, the following points are drawn from advice that indicates the:

- Process starts with the country programme being best aligned with their project pipeline and country priorities.
- GCF and AF both claim in seminars and written material that their processes are being streamlined and continue to be improved.
 - However, specific experience from Cook Islands and MCT indicate that even on a ‘rapid’ accreditation that it takes a long time.
- GCF processes have been reviewed and reassessed (considering a recent internal review and feedback – see mapping paper - GCF 2020).
 - While there is acknowledgement that there are many lessons from the review it is difficult to ascertain if this will lead a streamlining of the process that would reduce time and costs associated with accreditation.
- GCF has a specific COVID related response being developed to allow faster access to readiness funds and this continues to be refined.
- Great benefit from having a peer support process in conjunction with written guidance (such as the proposed NIE framework).
 - Common issues with Africa and Caribbean in accreditation.
- Results in access by AEs/NIEs have not been reflected in the resourcing and efforts made to make this happen.

Some of the feedback from those Pacific entities that have been accredited is that they suggest that the designing of the initial project/programme should be submitted at the same time as the entity undertakes the accreditation process and this allows for the proposal review process to begin quickly following accreditation. Further, AEs are permitted to submit concept notes prior to receiving accreditation. However, GCF project proposals require substantial upfront investment, and are highly detailed in their format so this presents an additional resourcing challenge for SIDS.

Lastly, as the UNDP 2018 identified, accreditation does not guarantee access. Entities should be aware that even if the entity is accredited, project/programme funding proposals are not automatically accepted. Proposals must be high quality and well aligned with national development plans and the objectives of the GCF.

Final Remarks

AEs or NIEs are responsible for overseeing project and financial management, and so are the only institutions that need to be accredited by the Adaptation Fund or the GCF. Those that have gone through the accreditation process suggest being prepared for a rigorous, time-consuming, but ultimately useful endeavour. From previous work, they generally recommend ensuring that the institution has adequate human and financial resources dedicated to the accreditation

process, including a team of people able to access information about the different sections of the institution. Buy-in from the senior level is also reported as crucial.

Some institutions have struggled more to provide documentation related to the accreditation requirements than to actually meet the standards. They therefore encourage others to ensure that they truly understand the application process by, for example, reaching out to the relevant fund early to ask questions about the process. They also recommend beginning early to thoroughly document the institution's systems and processes. Some institutions that did not initially meet all the requirements have benefited from being flexible enough to take on new processes, and from being creative in their thinking about how to meet the standards. Readiness support has helped national institutions overcome some of these challenges.

Overall, reflecting on the Pacific experience some of the key lessons identified for the recommendations going forward.

- This is a national investment – time, resources and people are necessary to be successful.
 - National consultants are a must.
- At the national/institution level, clear goals, good relations with the NDA and appropriate entity (legal form) to become the AE/NIE are necessary pre-requisites.
 - Local stakeholders and partners also have to be onboard and process is needed for their engagement and understanding of the process.
- A Pacific Framework is probably better to be designed as general guidance rather than specific steps (as the process is changing and continues to evolve) with case examples (it is best to have a mechanism to track the knowledge, diffuse those lessons and identify appropriate training from the challenges faced). There is no one road to successful accreditation.
- Using the guidance – it can be helpful in canvassing support and linkages with partners, regional organisations and training institutions.
- Framework should be partnered with a peer to peer-support process and a technical assistance mechanism to support the process.
- Multi-access strategy – work with RIEs/RAEs and MIEs/MAEs. Country access ambitions should be spread across multiple partners.
- Thinking differently: value of considering local CSOs and/or private sector. There is a focus on government in many AE considerations.
- The value of Readiness efforts to build capacity.
- Entities should work closely with NDAs and ensure that they embark in projects that are in line with country priorities
- The accreditation process is worth it only if the accredited entity intends to implement not one project, but several projects.

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Annex A: The consultation process

Data used in this report is drawn from several sources: semi-structured interviews with various participants, advisers and observers of access to finance; publicly available documents and reports from relevant sources in the Pacific; and personal observation of my own experience to access. Interviews are used to demonstrate particular aspects of policy and not to analyse the strengths or weaknesses of any particular country approach. They are more about the ability of countries to effectively initiate, develop and implement policies for access.

Despite planning and support from the PIFS/GIZ team, fewer people were consulted as expected. For example, requests for information were made via email to all AF and GCF focal points. However, the insights of the consultant with their own experience in climate finance and the access to various papers and online discussions did make up in some of the analysis. The following were a list of those that responded to requests for information.

Name	Position	Organisation	Date	Type	Interview or Meeting
Paul Mitchell	Head of the Climate Team	Save the Children	15 October 2020	MS Teams	Discussion
Claire Benhard	Deputy of the Planning Institute of Jamaica	Planning Institute of Jamaica	28 October 2020	ZOOM	Discussion
Claire Bernard	Deputy Director General Sustainable Development	Planning Institute of Jamaica	28 October 2020	ZOOM	Discussion
Stephen Borland	Senior Policy and Finance Advisor (FSM)	USAID Climate Ready Project	28 October 2020	Skype	Discussion with specific questions
Wayne King	Head of CC Unit Prime Minister's Office,	Cook Islands	Several occasions.	Email	Specific questions sent.
Various	Informal Working Group	Several bodies	26 November 2020	ZOOM	Meeting, presentation and discussion with attendees.
Diane McFadzien	Manager	Green Climate Fund	27 November 2020	MS Teams	Interview with set questions.
Sa'ane Lolo	Chief Economist, Head of CC Resilience Unit	Ministry of Finance, Kingdom of Tonga	27 November 2020	Email	Specific questions sent.
Walolyn Hamata	Principal Officer	Ministry of Finance and Treasury,	28 November 2020	ZOOM	Interview with set questions.

		Solomon Islands			
Meg Acemoglu	Team Leader – International	ClimateWorks Australia	30 November 2020	Via Phone	Discussion with several questions
Reuben Robin	Project Officer - PMCU/GCF	Climate Change & Development Authority	30 November 2020	ZOOM	Interview with set questions.
Katerina Syngellakis	Country Representative	GGGI	1 December 2020	Via MS Teams	Discussion with several questions

Questions Asked

How familiar do you consider you are of the processes related to becoming an NIE for the GCF/AF?

Have you commenced consideration of working towards NIE status?

What agency would become the NIE?

Is there a national roadmap/plan for accreditation?

Has a pipeline of projects been developed? (please share documents)

Identify some of the challenges in the process to date? Can you comment on specific capacity and capability issues. (focus on anti-corruption, activity management, procurement and Transparency).

Have you been able to access TA to support your national process? Whom? What type of support has been provided?

Has an assessment of your capacity to undertake a NIE accreditation process been done? If so, can you share the report(s).

Do you understand the current level of access to funds? Can you provide the data?