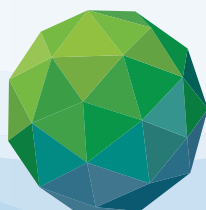


RMI Green Climate Fund Handbook:

Summary for National Stakeholders



GREEN
CLIMATE
FUND



SPREP
Secretariat of the Pacific Regional
Environment Programme

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Acronyms

AE	Accredited Entity
CCD	Climate Change Directorate
DAE	Direct Access Entity
GCF	Green Climate Fund
GoRMI	Government of the Republic of the Marshall Islands
IAE	International Access Entity
NAP	National Adaptation Plan
NDC	Nationally Determined Contribution
NSP	National Strategic Plan
NDA	National Designated Authority
NoL	No-objection Letter
PRC	Project Review Committee
PPF	Project Preparation Facility
RMI	Republic of the Marshall Islands
SDG	Sustainable Development Goal
TTEC	Tile Til Eo Committee

1. Summary of the Green Climate Fund (GCF)

a. Introduction

The Green Climate Fund (GCF) was established in 2010 and is now the world's largest fund dedicated to the fight against climate change. Finance from the GCF can be used to support the Republic of the Marshall Islands (RMI) to achieve a paradigm shift to low-carbon pathways and climate-resilient development. The GCF aims to achieve this by investing in transformative projects and programmes on climate adaptation and mitigation that contribute to national climate change policies and priorities. The RMI GCF Handbook has been prepared to provide clear, simplified and practical guidance for stakeholders to understand the GCF's requirements for accessing resources to develop and implement climate change projects.

b. Accessing GCF resources

The RMI is eligible for funding from the GCF, and RMI stakeholders can access GCF resources for projects and programmes through an accredited entity (AE)¹.

- AEs can be “direct access entities” (DAEs), which are regional or national entities, such as the Secretariat of the Pacific Regional Environment Programme and the Micronesia Conservation Trust. RMI currently does not have a national AE, and for the RMI to access finance directly through a national AE, a national entity will need to complete the GCF accreditation application procedure.
- The RMI can also access GCF resources through “international access entities” (IAEs), and accredited international entities include United Nations agencies, the World Bank and the Asian Development Bank.



Key Features of the Green Climate Fund

- Commitment to aim for 50:50 balance between mitigation and adaptation investments.
- At least 50% of adaptation funding aimed for the most vulnerable countries, including SIDS.
- Availability of a variety of financial instruments including grants, concessional loans, subordinated debt, equity, and guarantees, giving flexibility to match project needs.
- Direct private sector engagement in transformational climate-sensitive investments through the Private Sector Facility (PSF).

¹ The GCF accreditation process is outlined here: <https://www.greenclimate.fund/gcf101/getting-accredited/accreditation-process>

2. Key National GCF Stakeholders

a. The National Designated Authority (NDA)

The Government of the Republic of the Marshall Islands (GoRMI) has nominated the Climate Change Directorate (CCD), Ministry of Environment, as the National Designated Authority (NDA) of the GCF. The NDA has a number of important roles and responsibilities, which include²:

- Acting as the government’s focal point for communication with the GCF;
- Overseeing the development and approval of concept notes and funding proposals, and issuing no-objection letters;
- Convening and coordinating national stakeholders; and,
- Facilitating the accreditation process for national institutions and providing a nomination letter for GCF accreditation applications.

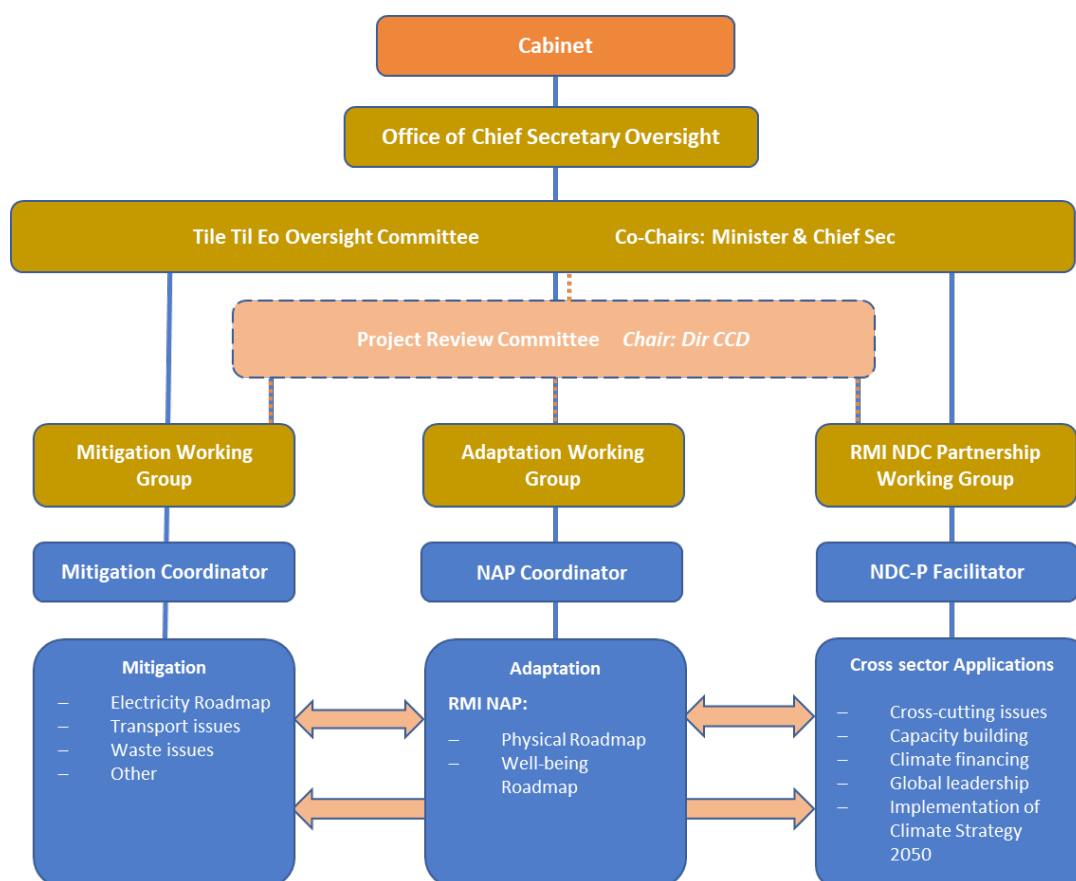
c. The Tile Til Eo Committee (TTEC)

The TTEC is the existing mechanism for climate change coordination and policy development. The TTEC shall provide approval, oversight and leadership of GCF activities and strategic planning. As required, the TTEC, through the Office of the Chief Secretary, will also request Cabinet approval of GCF proposals.

d. The Project Review Committee (PRC)

The PRC – which has representation from the NDA, Ministry of Finance, national ministries, local government and civil society – supports the NDA with GCF operations, including evaluating and appraising GCF project ideas, concept notes and funding proposals and evaluating national entity accreditation applications. The institutional arrangements are shown in Figure 1.

Figure 1: Institutional arrangements of Tile Til Eo Committee (TTEC) and Project Review Committee (PRC)



² Green Climate Fund, 2015, “Engaging with the Green Climate Fund”, Elements 01.

Best practices to consider for developing GCF proposals

- Demonstrate that the proposal aligns with national priorities. GCF projects must align with national climate priorities, including the NAP, NDC, and the RMI GCF Country Programme, and the broader development priorities articulated in the NSP. The proposal development, appraisal and approval procedures set out in this Handbook will ensure there is compliance with this critical requirement of the GCF.
- Contribute to at least one of the eight GCF strategic impact areas. The GCF has targeted a set of eight strategic impact areas in mitigation and adaptation (see Figure 3). It is essential that GCF projects align with at least one of these results areas.
- Climate relevance. It is essential that GCF projects are a response to a specific climate change problem – such as “low carbon shipping” or “building coastal resilience”. It is important that the climate problem remains the focus of the project throughout the development (and implementation) of the project.
- Demonstrate that the project complies with the GCF six investment criteria. GCF proposals must align with the GCF high-level investment criteria (as outlined in Figure 4).
- Demonstrate key stakeholder engagement. The development of GCF projects must involve a comprehensive, and inclusive process of engagement and consultation with all relevant national stakeholders. Following the procedures set out in this Handbook will help to ensure compliance with this critical requirement.
- Comply with environmental and social safeguards and manage risks. GCF project proposals must comply with the GCF Environment and Social Policy and have a strong set of Environmental and Social Safeguards to mitigate and manage potential environmental and social risks and/or impacts.
- Include gender considerations in the project design and implementation. GCF project proposals must describe how gender considerations have been incorporated into project design, in accordance with the GCF’s gender policy.



3. GCF project development process

a. Introduction

The approval of GCF projects involves developing concept notes and funding proposals. This section outlines the GoRMI's process for identifying and prioritizing project ideas, and developing and approving GCF concept notes and funding proposals. This is the only process by which GCF projects can be developed, and concept notes or funding proposals that have not been approved through this process will not be supported by the NDA. This process can take between 18 months to four years depending on the complexity and size of the project. Following approval, the GCF project/programme will be implemented by the Accredited Entity, with oversight from the GCF Secretariat and the NDA.

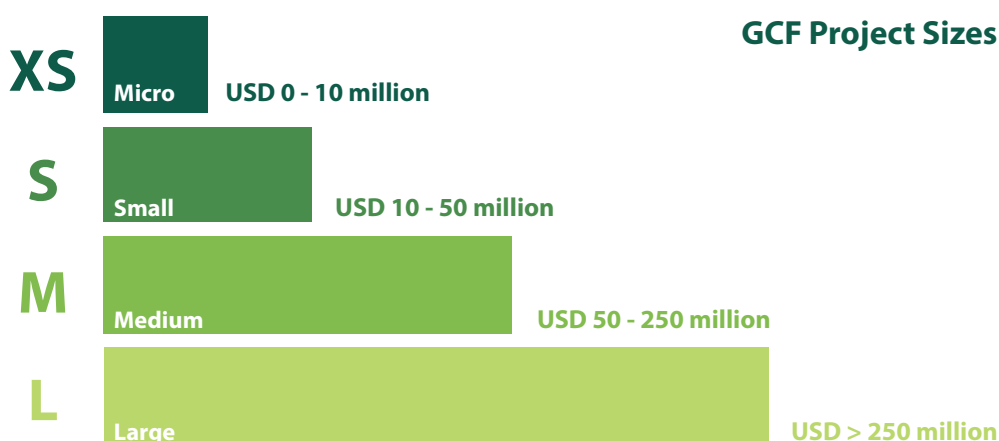
b. Development of GCF projects and programmes

The GCF finance activities that drive paradigm shifts towards low emission economic growth and climate resilience. When deciding on whether to invest in projects, the GCF will seek to strike a balance between national priorities, potential to deliver concrete climate benefits, cost considerations, and opportunities to deliver environmental, social and economic co-benefits.

GCF projects must be aligned to RMI national climate investment priorities, including the National Strategic Plan (NSP), the National Adaptation Plan (NAP), the Nationally Determined Contribution (NDC), and the GCF Country Programme.

GCF projects/programmes can use public or private sector finance and multiple sources of co-finance (including from the domestic budget and donors). And as shown in Figure 2, GCF projects can be of varying sizes.

Figure 2: GCF project sizes ³



The GCF finances climate resilient and low-emission projects and programmes that contribute towards achieving at least one of its eight strategic impact areas – four of these are related to adaptation and four mitigation, as shown in Figure 3.

³ Adopted from Green Climate Fund, 2015: <https://www.greenclimate.fund/how-we-work/tools/infographics>

Figure 3: Mitigation and adaptation strategic impact areas of the GCF⁴



To ensure that GCF resources achieve a paradigm shift towards climate resilient and low-emission development in an economically efficient and inclusive manner, the GCF has outlined six high-level investment criteria that all project proposals need to reflect (as shown in Figure 4).

The integration of environmental and social and gender considerations within a funding proposal is another key requirement.

- The GCF Environment and Social Policy aims to ensure that the “GCF will effectively and equitably manage environmental and social risks and impacts and improve outcomes of all GCF-financed activities”.⁵ This includes the Environmental and Social Safeguards, which “is set of standards that specifies the desired outcomes and the specific requirements to achieve these outcomes through means that are appropriate to the nature and scale of the activity and commensurate with the level of environmental and social risks and/or impacts.”⁶
- The GCF recognizes the importance of gender equality in the access and impact of climate funding. The GCF has adopted a Gender Policy and Action Plan supporting gender equality, equity and sensitivity.

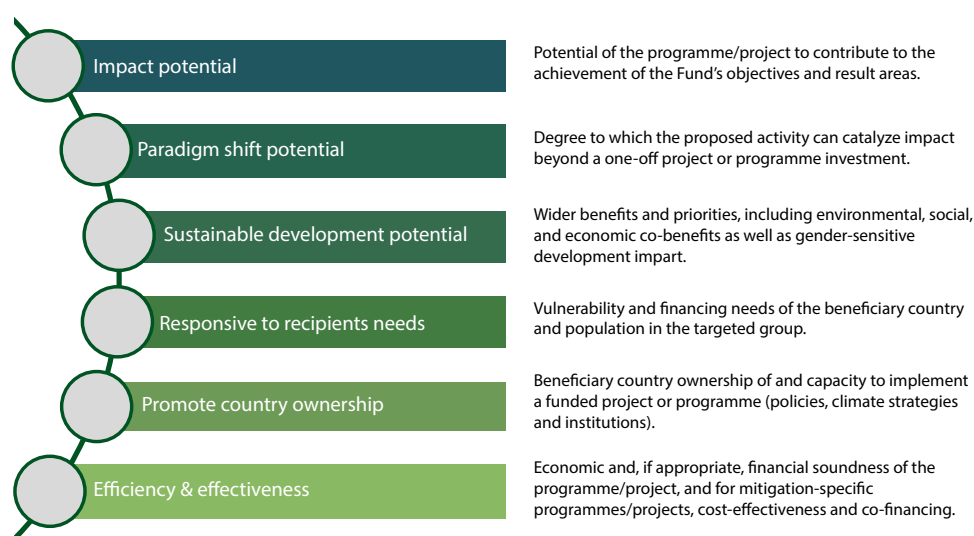


⁴ Adopted from Green Climate Fund, 2015: <https://www.greenclimate.fund/how-we-work/tools/infographics>

⁵ Green Climate Fund, 2018, “Environmental and social policy”.

⁶ Ibid.

Figure 4: GCF high-level investment criteria⁷



Examples of GCF project from Pacific Island Countries

- Addressing climate vulnerability in the water sector (ACWA) in the Marshall Islands:** This US\$ 24.7 million project (with UNDP as the Accredited Entity) is supporting the GoRMI in adapting to increasing climate risks, particularly more frequent and extreme droughts, which impact the country's drinking water supply.
- Pacific Resilience Project Phase II for the Republic of the Marshall Islands:** This US\$ 44.1 million adaptation project (with the World Bank as the Accredited Entity) is enhancing the resilience of people in Majuro and Ebeye to long-term climate change through coastal protection to protect lives and property from inundation.
- Tuvalu Coastal Adaptation Project:** This US\$ 38.9 million adaptation project (with UNDP as the Accredited Entity) aims to protect Tuvalu from the impact of rising sea level and increasing cyclone events that threaten the country's viability.
- South Tarawa Water Supply Project:** This US\$ 58.1 million adaptation and mitigation project (with ADB as the Accredited Entity) is building a water secure future for the residents of Kiribati's capital, South Tarawa.
- Climate Information Services for Resilient Development in Vanuatu:** This US\$ 21.8 million adaptation project (with SPREP as the Accredited Entity) is using science to better prepare Vanuatu's policy makers and public for a changing climate.

⁷ Green Climate Fund, 2018, "Investment criteria indicators", GCF/B.20/Inf.14.

4. Overview of the RMI GCF project cycle

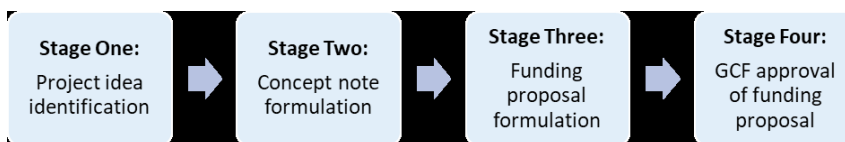
The identification of project ideas, and development, appraisal and approval of GCF concept notes and funding proposals must follow the RMI GCF project cycle, which is summarized in Figure 5 and described in detail in this section.

i. Stage One – Project idea identification

The first step is the identification of priority climate change project ideas.

- Project proponents will submit project ideas to CCD, the GCF NDA, via email.
- Project proponents will be required to complete the project idea template attached in “Annex One”. The NDA can provide support and answer questions on completing the template.
- The project ideas will be reviewed by the NDA, and evaluated and approved by the Project Review Committee – only approved project ideas can be developed into GCF concept notes.

Figure 5: Overview of the RMI GCF project cycle



ii. Stage Two – Concept note formulation:

At this stage, the project idea is converted into a concept note. The development of the concept note shall be led by an AE with oversight by the NDA.

- The concept note presents a summary of a proposed project or programme, and provides the AE with the opportunity to seek feedback from the GCF Secretariat on whether the concept is aligned with the Fund’s objectives, policies, and investment criteria.
- The development of a concept note can take up to 12 months.

iii. Stage Three – Funding proposal formulation:

At this stage, the GCF Secretariat has provided comments on the concept note and the AE uses this as the basis for developing the funding proposal.

- The development of the funding proposal can take up to 24 months, and requires considerable research, consultation and assessments on project design and costing.
- The development costs will vary considerably depending on the project scale, the financial instruments used, and the AE selected.

iv. Stage Four – GCF approval of funding proposal:

Following the submission of the approved Funding proposal to the GCF, the proposal is reviewed by the GCF Secretariat and the final decision is made by the GCF Board.

- Funding proposals that are submitted to the GCF are subject to a rigorous review process, which culminates in a decision by the GCF Board as to whether support the project.

c. The RMI no-objection procedure

As required by the GCF, all entities submitting a funding proposal to the GCF require a No-objection Letter (NoL) from the NDA. The GoRMI has adopted the RMI GCF Project Cycle (summarized in Figure 5) as the no-objection procedure for ensuring that funding proposals for RMI are consistent with national laws, regulations, development and climate priorities. The no-objection procedure is outlined in Figure 6.

The GCF requires NoLs for all funding proposals, as well as concept notes for which a Project Preparation Facility (PPF) request is submitted. The NoL should be submitted within 30 days of the proposal itself, and can be submitted separate from the proposal.

Figure 6: Summary of No-Objection Procedure

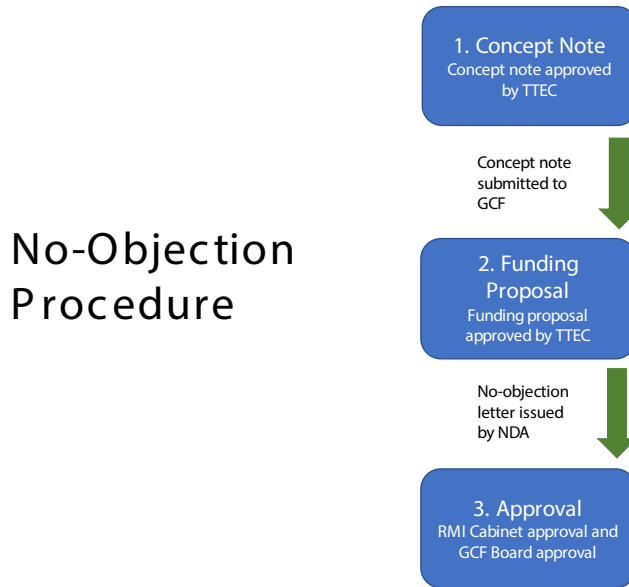


Photo: Jake Marjete



Annexes

5. Annex One: National project idea template

1. National Project Idea Template

- The template and self-evaluation checklist should be completed by the applicant and submitted to NDA for review.
- See the guide below for information on completing this template. The NDA can also answer any questions the project proponent may have on completing this template.

1. Project/Programme title:	
2. Submission date:	
3. Applicant:	
4. Applicant contact details: a. Address: b. Phone: c. Email:	
5. Estimated duration:	6. Project location(s):
7. Estimated funding requirements: <i>If known at this stage.</i> a. Estimated Total Project Funding:	8. Proposed lead agencies:
9. Accredited Entity (AE): <i>If known at this stage.</i> a. Name of the AE: <input type="checkbox"/> Direct Access Entity (DAE) <input type="checkbox"/> International Access Entity (IAE)	10. Project scope: <i>Tick all relevant boxes.</i> <input type="checkbox"/> National <input type="checkbox"/> Local (outer islands) <input type="checkbox"/> Community <input type="checkbox"/> Regional/International – if so, specify other countries involved:
11. Sector(s):	12. Climate theme(s): <i>If cross-cutting, tick both boxes.</i> <input type="checkbox"/> Adaptation <input type="checkbox"/> Mitigation
13. Strategic alignment with RMI national priorities: <i>If known at this stage, provide description below and tick relevant boxes.</i> <input type="checkbox"/> National Strategic Plan <input type="checkbox"/> Nationally Determined Contribution <input type="checkbox"/> National Adaptation Plan <input type="checkbox"/> GCF Country Programme <input type="checkbox"/> Relevant Sectoral Plans	

14. Climate impact areas: *Tick all relevant boxes.*

- | | |
|--|---|
| <input type="checkbox"/> Energy access and power generation | <input type="checkbox"/> Livelihoods of people and communities |
| <input type="checkbox"/> Low emission transport | <input type="checkbox"/> Health and well-being, and food and water security |
| <input type="checkbox"/> Buildings, cities and industries and appliances | <input type="checkbox"/> Infrastructure and built environment |
| <input type="checkbox"/> Forestry and land use | <input type="checkbox"/> Ecosystem and ecosystem services |

15. Project description:

- a. What is the objective of the project?
- b. What are the project activities?
- c. Is this project building on any previous activities?

16. Main beneficiary groups:

17. Consultations completed: *If consultations have taken place at this stage.*

18. Annexes: *Annexes are not required, but can be attached to this template if there are relevant studies/assessments/additional information at this stage.*

19. Self-evaluation checklist: *Applicant must complete.*

No.	Criteria	Yes	No	Remarks
1	Project Profile Form	<input type="checkbox"/>	<input type="checkbox"/>	<i>Is the form completed to a satisfactory level?</i>
2	Implementing agencies	<input type="checkbox"/>	<input type="checkbox"/>	<i>Does the template outline key implementing agencies?</i>
3	Climate relevance	<input type="checkbox"/>	<input type="checkbox"/>	<i>Is the proposal climate relevant? The proposal must demonstrate that it will achieve adaptation or mitigation results in at least one of the eight GCF strategic impact areas.</i>
4	Strategic alignment with RMI priorities	<input type="checkbox"/>	<input type="checkbox"/>	<i>Demonstrates alignment with RMI national climate change and development priorities, particularly the NDC, NAP, NSP, sectoral plans and SDGs.</i>
5	Clear and logical design	<input type="checkbox"/>	<input type="checkbox"/>	<i>Does the template outline the objective of the proposed project/programme? Does the proposal clearly outline the proposed activities, and how the project would build on previous activities?</i>
6	Project Beneficiaries	<input type="checkbox"/>	<input type="checkbox"/>	<i>Are the project beneficiaries clearly outlined?</i>
7	Stakeholder Consultations	<input type="checkbox"/>	<input type="checkbox"/>	<i>Does the template provide evidence that key stakeholders (i.e. implementing agencies, project beneficiaries) have been consulted?</i>

6. Annex Two: Stakeholder guide for completing project idea template

- 1. Project/Programme title:** Please insert title.
- 2. Submission date:** Insert date of template.
- 3. Applicant:** Insert name of applicant submitting template.
- 4. Applicant contact details:** Insert contact details, including address, phone and email.
- 5. Estimated duration:** What is the expected implementation period of the project? GCF projects have an implementation duration of 4-8 years, but it could have a shorter or longer duration depending on the nature of the project.
- 6. Project location(s):** Specify the location(s) of the proposed project.
- 7. Estimated funding requirements:** Specify the amount of GCF finance requested, and co-finance requested from international sources and domestic sources. GCF projects are usually greater than US\$10 million, and most approved projects are between US\$10-100 million.
- 8. Proposed lead agencies:** Identify the lead ministries, national government agencies, local governments and development partners (and also civil society organizations and businesses) that may be responsible for the implementation and execution of GCF-funded projects.
- 9. Accredited Entity (AE):** If known at this stage, specify the proposed GCF AE (however, this is not compulsory at this stage). Direct Access Entities (DAEs) are national/regional entities – currently RMI has no national DAEs but there are regional DAEs including Micronesia Conservation Trust, SPREP and SPC. GCF projects in RMI can also be implemented through international AEs (international AEs active in RMI include ADB, World Bank, UNDP, UNEP, and FAO). The full list of Accredited Entities is on the GCF Website: <https://www.greenclimate.fund/how-we-work/tools/entity-directory>
- 10. Project scope:** This is the scale of the project – i.e. will the proposed intervention be a community or national project, or a regional project with other countries. If other countries are involved, please specify the countries.
- 11. Sector(s):** Specify which sector(s) the proposed activity will focus on – i.e. coastal infrastructure, energy, agriculture, health.
- 12. Climate theme(s):** Specify if the project is categorized as mitigation or adaptation. If it is a cross-cutting project, please tick both boxes.
- 13. Strategic alignment with RMI national priorities:** The NDA seeks to ensure that activities supported by the GCF align with strategic national objectives and priorities.
- 14. Climate impact areas:** To help achieve a paradigm shift towards low-emission and climate-resilient development, the GCF has identified four mitigation and four adaptation strategic impact areas. Please tick the relevant box(es).

15. Project description:

a. What is the objective of the project? Describe the primary need of the project (i.e. “coastal erosion”) and the climate impact of the project (i.e. “increased coastal resilience”).

b. What are the project activities? Briefly describe the main activities (i.e. “improve rainwater harvesting systems for community buildings and households”).

c. Is this project building on any previous activities? Describe how the project may build on past activities and achieve synergies with existing interventions (i.e. scale up of successful pilot project).

16. Main beneficiary groups: Describe the groups that will benefit from this project – i.e. communities, outer island populations, vulnerable groups (including by responding to the needs of women, youth and children).

17. Consultations Completed: If consultations have taken place at this stage, please describe consultations that have been completed with national and local government, communities, and other key stakeholders. Consultations give stakeholders the opportunity to provide feedback and integrate their views and priorities into the project design.

18. Annexes: Annexes are not required, but can be attached to this template if there is additional information available that would strengthen this application. This could include assessments and studies, evidence of consultations, etc.

19. Self-evaluation checklist: The project applicant must complete this checklist and submit to the NDA with the project idea template.

Annex Three: Glossary of Terms

Accreditation	A process under which entities have to demonstrate that they have the ability to manage the GCF's resources in accordance with standards and criteria set out by the GCF in the accreditation application.
Accredited Entity (AE)	An entity that is accredited by the GCF Board in accordance with the Governing Instrument and relevant Board Decisions. The GCF mobilizes climate finance by working through a wide range of Accredited Entities (AEs). Organizations seen to have specialized capacities in driving climate action may apply to become GCF AEs. They can be private, public, non-governmental, sub-national, national, regional or international bodies.
Adaptation	An adjustment in natural or human systems in response to actual or expected climatic stimuli or their effects, which moderates harm or exploits beneficial opportunities.
Climate Finance Readiness	Climate finance readiness reflects a country's capacity to plan for, access, and deliver international and domestic climate finance, as well as monitor and report on expenditures.
Concept Note	A document which provides essential information about a proposal to seek feedback on whether the concept is aligned with the objectives, policies and investment criteria of the GCF. The GCF concept note template can be downloaded from the GCF website.
Country Programme	The country programme articulates and defines national climate priorities and presents a pipeline of projects and programmes that the RMI would like to develop with the GCF. It provides an action plan that details how projects and programmes are to be developed, the type of entity to partner with, and the readiness and project preparation support required.
Delivery Partner	An institution selected by the National Designated Authority to implement activities approved under the Readiness and Preparatory Support Programme.
Direct Access Entities (DAEs)	Direct Access Entities (DAEs) are GCF Accredited Entities that are public, private or non-governmental institutions that apply for accreditation through the direct access modality. DAEs are regional, national and sub-national institutions, which are nominated by the National Designated Authority.
Enhanced Direct Access	The EDA is a modality for devolving the approval of individual proposals to the country. Under this country driven programmatic approach, the submission of individual projects is not required, with fund management, implementation and execution all devolved to the national level.
Environmental and Social Safeguards (ESS)	A reference point for identifying, measuring and managing environmental and social risks. The purpose of the Environmental and Social Safeguards (ESS) is to determine the key environmental and social risks the accredited entity intends to address in the conceptualization, preparation and implementation of funding proposals, and to provide guidance on how these risks are to be managed.
Executing Entity (EE)	An entity through which GCF proceeds are channelled for the purposes of a funded activity or part thereof; and/or any entity that executes, carries out or implements a funded activity, or any part thereof. An accredited entity may carry out the functions of an executing entity, though it is preferable if local and national actors execute projects/programmes.
Funding Proposal	A document that is submitted by entities who want to get access to GCF resources for climate change projects and programmes. Funding Proposals can be submitted to the GCF at any time, and are subject to a review process, culminating in a decision by the GCF Board as to whether to support the project. The GCF funding proposal template can be downloaded from the GCF website.
Gender Policy	The Fund's Gender policy aims to ensure the GCF will efficiently contribute to gender equality and will, in return, achieve greater and more sustainable climate change results.

International Access Entities	International Access Entities are GCF Accredited Entities that include United Nations agencies, multilateral development banks, international financial institutions and regional institutions. The GCF considers these organizations to have the wide reach and expertise to handle a variety of climate change issues, including ones that cross borders and thematic areas.
Investment Criteria	Six investment criteria adopted by the GCF Board, namely impact potential; paradigm shift potential; sustainable development potential; needs of the recipient; country ownership; and efficiency and effectiveness. There are coverage areas, activity-specific sub-criteria, and indicative assessment factors that provide further elaboration.
Mitigation	In the context of climate change, mitigation refers to interventions that aim to reduce emission of greenhouse gases and/or enhance carbon sinks.
National Designated Authority (NDA)	A core interface and the main point of communication between a country and the GCF. The National Designated Authority (NDA) seeks to ensure that activities supported by the GCF align with strategic national objectives and priorities, and help advance ambitious action on adaptation and mitigation in line with national needs. Key roles of NDAs are to issue no-objection letters for proposal and provide letters of nomination to direct access entities.
Nomination Letter	A letter provided by the National Designated Authority to prospective entities seeking GCF accreditation. Entities applying for accreditation need to submit a nomination letter as a part of the accreditation application.
No-Objection Letter	A letter issued from the National Designated Authority confirming that it has no objection to a funding proposal submitted by an Accredited Entity. The no-objection letter will only be issued following the completion of the RMI no-objection procedure.
Private Sector Facility	The Private Sector Facility (PSF) engages the local and global private sector to invest in mitigation and adaptation activities. The PSF aims to change the current paradigm by de-risking the delivery of private capital and scaling up private sector investment flows for low carbon and climate resilient development.
Project Preparation Facility	Project Preparation Facility (PPF) is financial support provided by the GCF usually in the form of grants to the accredited entities (AEs), especially for development of funding proposals for micro-to-small size projects submitted by Direct Access Entities.
Project Proponent	A group or organisation that submits or proposes a project idea to the National Designated Authority. It can be from the private or public sector (including ministries, local governments, private sector actors, civil society organizations and community organizations), and can also be an existing AE of the GCF.
Results areas	Eight result/impact areas which will deliver major mitigation and adaptation benefits to promote a paradigm shift towards low-emission and climate-resilient development. Mitigation includes four result areas, namely low-emission energy access and power generation; low-emission transport; energy efficient building, cities and industries; and sustainable land use and forest management. Adaptation covers the other four, namely enhanced livelihoods of the most vulnerable people, communities and regions; increased health and well-being, and food and water security; resilient infrastructure and built environment to climate change threats; and resilient ecosystems. All proposals must reflect one or more of the result/impact areas.
Simplified Approval Process	The Simplified Approval Process Pilot Scheme (SAP) is an application process for smaller-scale projects or programmes. Projects or programmes are eligible for the SAP if they meet three main eligibility criteria: (i) Ready for scaling up and having the potential for transformation; (ii) a request for financing to GCF of up to USD 10 million of the total project budget; and (iii) the environmental and social risks and impacts are classified as minimal to none.

