

June 30, 2015

Green Climate Fund Secretariat
Songdo International Business District
Incheon, Republic of Korea

Dear Ms. H la Cheikhrouhou and the GCF Board Ethics and Audit Committee,

We are writing to you as organisations and individuals that are concerned about transparency at the Green Climate Fund (GCF) and, in particular, the process by which the current Interim Information Disclosure Practice will be replaced by a new Information Disclosure Policy, as requested by the Board at its 8-10 October 2013 meeting (Decision B.05/23).

Specifically, we have serious concerns that there may only be limited opportunities for public comment and consultation with external stakeholders before the draft policy is put to the Board. As far as we are aware, there is no plan to publicly release a draft of the policy for comment and subsequent revision in advance of the 11th Board meeting, when it is now due to be considered.

We believe that it is urgent to move forward with the process of developing a new Information Disclosure Policy, given its importance for the overall transparency and accountability of the GCF. However, the current practice of posting draft policies one to three weeks prior to Board meetings, with no formal public consultation, is not sufficient.

Our view is that there should be robust public consultations on the Information Disclosure Policy, as well as policies that have an important impact on the way that the GCF engages with external stakeholders or policies in which external stakeholders have a direct interest. Such policies include the Monitoring and Assessment Framework, the policies implementing the Independent Redress Mechanism, the Environmental and Social Management System (ESMS) and the Fund's own Environmental and Social Safeguards (ESS).

Formal public consultation processes have long been the norm at other international financial institutions (IFIs). For example, both the World Bank and the European Investment Bank engaged in extensive consultations when they last reviewed their disclosure policies, in 2009 and 2014-5 respectively. These processes are outlined briefly in the Annex. It has been longstanding practice at these and other IFIs to publish draft versions of all policies that are important to external stakeholders well in advance of their adoption to allow for meaningful public input.

We believe that the consultation process should include at least the following steps:

1. A public announcement that the policy review will be taking place, with an opportunity for interested stakeholders to provide advance comments to feed into the initial preparation work by the Secretariat.

2. The publication of a draft policy (or revised policy, as the case may be) with a period of at least 30 days for interested stakeholders to make submissions.
3. The public posting of all submissions that have been received.
4. Publication of the revised draft policy well in advance of Board consideration, so that interested stakeholders have the opportunity to provide comments to the Board.
5. Publication, at the same time as the above, of a note indicating how the main initial comments by external stakeholders have or have not been taken into account in the revised policy.

We urge the GCF to respect basic norms of open and transparent governance, as well as the established practice at other IFIs, by engaging in a proper process of consultation around the adoption of its Information Disclosure Policy. This will ensure that the GCF respects international best practice standards as it strives to meet its organizational objectives. This should start as soon as possible with the publication of a draft Policy and an opportunity for external stakeholders to provide comments on that draft.

Specifically, we call on Members of the Board's Ethics and Audit Committee to mandate the GCF Secretariat, during the upcoming 10th Board meeting in Songdo, to initiate a formal public consultation process for the policy, as described above, prior to consideration by the Board at its 11th meeting.

Yours sincerely,

The undersigned organizations and individuals:

Organizations

1. Accountability Counsel
2. ActionAid, United States of America
3. Africa Freedom of Information Centre, Uganda
4. African Women's Network for Community Management of Forests (REFACOF)
5. Aksi! for Gender, Social and Ecological Justice, Indonesia
6. Aksyon Klima Pilipinas
7. All Nepal Peasant Federation (ANPFa)
8. All Nepal Women Association
9. Amigos del Viento
10. Asian Peoples Movement on Debt and Development (APMDD)
11. Asociación Ambiente y Sociedad, Colombia
12. Ateneo School of Government, Philippines
13. Bangladesh Krishok Federation
14. Bangladesh NGOs Network for Radio and Communication (BNNRC)
15. Beyond Beijing Committee (BBC)
16. Bianca Jagger Human Rights Foundation
17. Campaign for Freedom of Information, United Kingdom
18. Carbon Market Watch
19. CARE International - Poverty, Environment and Climate Change Network (PECCN)

20. Center for Education, Research and Development in the Upland Areas of Vietnam (CERDA)
21. Center for Indigenous Peoples' Research and Development (CIPRED)
22. Center for International Environmental Law
23. Center for Socio-Economic Research and Development (CERDN), Nepal
24. Center of Indigenous Cultures of Peru (CHIRAPAQ)
25. Centre for Peace and Development Initiatives (CPDI), Pakistan
26. Centre pour l'Environnement et le Développement (CED)
27. Centro de Planificación y Estudio Social (CEPLAES)
28. Centro Mexicano de Derecho Ambiental (CEMDA)
29. Centro para la Autonomía y Desarrollo de los Pueblos Indígenas, Nicaragua (CADPI)
30. Chalimbana River Headwaters Conservation Trust, Zambia
31. Civic Concern Nepal (CCN)
32. Climate Justice Programme
33. Commonwealth Human Rights Initiative, India
34. Comunicacion y Educacion Ambiental SC
35. Confederación General de Trabajadores del Perú-a través de la Secretaría de Ecología y Medio Ambiente
36. Confederación Nacional de Trabajadores Dominicanos (CNTD)
37. Continental Network of Indigenous Women of the Americas (ECMIA)
38. Coordinadora de las Organizaciones Indígenas de la Cuenca Amazónica (COICA)
39. Ecological Society of the Philippines
40. Equidad de Género: Citizenship, Work and Family
41. Equity Bd Bangladesh
42. Federation of Community Forestry Users, Nepal (FECOFUN)
43. Forest Peoples Programme
44. Forests of the World
45. Foundation for GAIA, United Kingdom
46. Freedom from Debt Coalition (FDC), Philippines
47. Friends of the Earth, United States of America
48. Fundación Ambiente y Recursos Naturales (FARN)
49. Fundación Heinrich Boell, México
50. Fundación M'Biguá, Ciudadanía y Justicia Ambiental, Argentina
51. Fundación Terram, Chile
52. Germanwatch
53. Global Alliance for Incinerator Alternatives
54. Green Environment Youth Korea (GEYK)
55. GTCR RDC
56. Heinrich Boell Stiftung North America
57. Indigenous Livelihoods Enhancement Partners (ILEPA)
58. Info House (Institute for Privacy and Access to Public Information), Slovenia
59. Institute for Climate and Sustainable Cities
60. Institute for Policy Studies, Climate Policy Program
61. Interamerican Association for Environmental Defense (AIDA)
62. International Trade Union Confederation (ITUC)

63. International Work Group for Indigenous Affairs (IWGIA)
64. INTLawyers
65. Jagaran Nepal
66. Korea Federation for Environmental Movements
67. KRUHA Indonesia Peoples' Coalition for the Right to Water
68. Labour, Health and Human Rights Development Centre, Nigeria
69. LDC Watch
70. Maleya Foundation, Bangladesh
71. Migrant Forum in Asia (MFA)
72. National Federation of Youth NGO (NFYFN), Nepal
73. Nepal Federation of Indigenous Nationalities (NEFIN)
74. NGO Coalition for Environment, Nigeria
75. Open Democracy Advice Centre (ODAC), South Africa
76. Oxfam America
77. Pakistan Fisherfolk Forum
78. Pan African Climate Justice Alliance
79. Philippine Movement for Climate Justice (PM CJ), Philippines
80. Planetary Association for Clean Energy, Canada
81. Pro Natura – Friends of the Earth, Switzerland
82. Rainforest Foundation Norway
83. Rural Reconstruction Nepal (RRN)
84. SANLAKAS, Philippines
85. Sawit Watch, Indonesia
86. Sierra Club
87. Solidaritas Perempuan (SP), Indonesia
88. SONIA for a Just New World, Italy
89. South Asian Alliance for Poverty Eradication (SAAPE)
90. Tebtebba (Indigenous Peoples' International Centre for Policy Research and Education)
91. The Access Initiative, United States of America
92. Third World Network
93. Tifa Foundation/OSF, Indonesia
94. Transparency International
95. Transparency International, Korea Chapter
96. VOICE
97. Women in Europe for a Common Future
98. Women Welfare Society(WWS)
99. Women's Environment and Development Organization (WEDO)
100. World Wildlife Fund, International
101. World Wildlife Fund, United States of America
102. Youth Association for Development (YAD), Pakistan
103. Youth Federation Nepal (YFN)
104. Zero Waste Europe

Individuals

1. Anny Mandungu, Democratic Republic of Congo
2. Bianca Jagger
3. David Estrin
4. Dr. R. Mario Caffera
5. Dwight E. Hines, USA
6. Lourdes Morales, Mexico
7. Saad Filali Mknassi, Morocco
8. Vanda Altarelli
9. Vita de Waal
10. Yahia Shukkeir, Jordan

Annex: The Practice at Other IFIs

World Bank

When it reviewed its Policy on Disclosure of Information in 2009, the World Bank followed up on its announcement of the review by publishing an Approach Paper “Toward Greater Transparency: Rethinking the World Bank’s Disclosure Policy” (January 29, 2009) containing a detailed analysis of the existing policy and clear proposals for the new one. Civil society groups were given an opportunity to comment on these proposals and many did so.

Between that date and October, when it published a revised policy proposal, the Bank hosted a number of physical meetings – both at its headquarters in Washington and in different locations around the world – to discuss the policy review. A second set of policy proposals, “Toward Greater Transparency Through Access to Information: The World Bank’s Disclosure Policy: Revised Draft”, was published on 2 October 2009, allowing for further external stakeholder input before the policy went to the Board on 17 November 2009.

European Investment Bank

The European Investment Bank (EIB) initiated its review of its Transparency Policy with a public announcement to this effect in May 2014. A draft of the new policy was published on the EIB’s website on 4 July 2014, and stakeholders were given a formal opportunity to make written submission on the draft. An in-person meeting with stakeholders was held in Brussels on 10 July 2014, followed by a second in-person meeting on 10 September 2014. On 9 January 2015, a revised draft policy was published in advance of the 3 February 2015 Board meeting where the document was discussed. The EIB’s draft comments on the submissions by stakeholders (an issues matrix) was also published on 9 January 2015, describing how the Bank had addressed their comments. The new policy was approved by the Board on 3 February 2015 and by EIB governing bodies on 6 March, and the final policy was published on the EIB website, along with the EIB’s final comments on stakeholder submissions, on 10 March 2015.