



GEF CSO Network

Statement on : Draft Policy Directions for GEF-9: STAR

Presentation by GEF Secretariat (Document GEF/R.9/09)

GEF-9 Replenishment (Second Meeting), Oct 07-09, 2025

The GEF-CSO Network welcomes the proposals for adjustment of the STAR. We believe the STAR is important to enhance country ownership and predictability of finance for recipient countries, but historically STAR has had an unintended impact of reducing funding to CSO-led projects. We have some specific comments on some portions of the proposal.

1. We would like to see an element in the STAR that can incentivize countries that undertake a Whole of Society Approach. Perhaps this can be included in country performance.
2. We support the inclusion of NbS to reduce vulnerability to drought. Nature-based solutions are critical to addressing land degradation as well as generating benefits for biodiversity and climate change. Linked to the earlier NGI discussion - we think that a key niche of GEF for NGI should particularly be NGI for NbS. Maybe STAR should take this into account.
3. We are concerned about the Global Benefits Index for Climate Change. While we support the inclusion of the Forest Cover Index as a proxy for emissions reductions and or sequestration related to forest cover and deforestation, we believe that the largest global terrestrial carbon store has not been considered. Globally, peatland ecosystems cover just over 3% of the land surface but store 25% of soil carbon and twice as much carbon as the biomass of all the world's forests combined. Annual CO₂ emissions from peatland degradation are estimated at 2-4 billion tonnes or about 5-10% of global GHG emissions and 30-50% of net GHG emissions from the LULUCF Sector.

As highlighted by the representative from Africa yesterday, peatlands in the Congo Basin form the largest tropical peatland globally and it is extremely important to give a proper incentive to the countries in the region who are taking action to protect their large peatland areas. Similarly, peatlands in Southeast Asia, China and South America are also of global significance.

There is good information on the extent and status of global peatlands, especially through the Global Peatland Assessment published in 2022 by a global expert team led by UNEP. There are also country-by-country estimates on CO₂ emissions from peatland degradation by the Greifswald Mire Conservation Centre and Wetlands International. Can GEFSEC respond if this can be integrated with the Forest Cover Index.

4. We support the increasing of floors to SIDS and LDCs as well as ringfencing their allocation.
5. Finally, we support the inclusion of whole of society approaches in the competitive Window for the top recipients. We believe that the focus should be more broadly on measures to ensure the whole of society approach beyond the National Steering Committees.

We will submit further written comments.