



GEF CSO Network

Policy Directions for GEF-9: Compact of Actions, Results Management, Risk Management & Draft Policy Recommendations

GEF-9 Replenishment (Third Meeting), January 19-20, 2026

The GEF CSO Network welcomes the substantial efforts undertaken to revise the Policy Directions for GEF-9 and recognizes the progress made in responding to feedback from participants and stakeholders. We particularly acknowledge the strengthened framing around whole-of-society approaches, inclusive execution, and the updating of the GEF operating model.

We note progress on engaging civil society, Indigenous Peoples, and local community organizations in inclusive execution, results and tracking and the governance reform process as follows:

- Inclusive Execution: We welcome the explicit recognition that implementation should be broadened to include civil society, Indigenous Peoples, and local communities' organizations, *as noted in the Executive Summary (para vii)*. This represents an important shift toward more inclusive delivery and aligns with the ambitions set out in the Strategic Positioning and Programming Directions.
- Results and Tracking: We note positively the strengthened Results Management Framework outlined in Section III (page 48, including the increased emphasis on tracking socio-economic co-benefits and improved accountability. We are happy to see the tracking of resource flows to IPLC and CSOs (para 110). This creates an opportunity to better recognize and assess the contribution of CSO-led Medium-Sized and Full-Sized Projects across the GEF-9 portfolio.
- Governance Reform Process: We welcome the proposal to invite Council Members to consider establishing a dedicated, time-bound working group on governance and oversight, as reflected in the Executive Summary (para vi, point 5). This is a constructive step toward addressing long-standing questions related to representation, accountability, and the evolving architecture of the GEF family of funds.

However, in our view, some further adjustments are needed to ensure that these measures are actually implemented.

We are concerned that the participation of civil society, Indigenous Peoples, women, and youth in country-level decision-making structures remains largely discretionary. As experience has shown, encouragement alone does not ensure meaningful participation. To safeguard accountability and effective partnership and proposals by in line with Canada and Sweden, **we reiterate the need for formalized roles for CSOs and IPLCs within National Steering Committees and other national coordination mechanisms (see Para 26s)**, building on existing good practices already in place in several countries.



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On Streamlining and Early Engagement, we remain concerned that accelerated approval modalities may come at the expense of early and meaningful stakeholder engagement. Clear safeguards are needed to ensure that civil society and IPLCs are involved from the earliest stages of country programming and pipeline development, rather than only during implementation. We are worried, in particular, that the proposal to drop the preparation of the PIF and replace it with a Project Preparation Request, will mean that key information on the project description, location, stakeholder engagement process etc will likely only be provided to the Council or posted online for civil society and other stakeholders at the time of CEO Endorsement (ie after completion of project design) and then only for projects with budgets greater than \$5 million. It is also unclear at what stage(s) the OFP endorsement will be needed and if this will enhance or reduce country ownership?

On SGP, and ICI: the Policy Directions do not yet provide sufficient clarity on resourcing for local action. In particular: The Small Grants Programme (SGP) continues to face pressure, with no policy-level signal to prevent further real-term decline. We urge the setting of \$360 million funding envelope for SGP in all scenarios and also reiterate our support for the proposal by UK and others for \$100 million minimum allocation to the Inclusive Conservation Initiative (ICI).

We reiterate that an ambitious GEF-9 replenishment must include adequate and predictable resources for mechanisms that deliver direct access for civil society, Indigenous Peoples, women, and youth. With regard to para 26p. - and in line with proposal by UK, New Zealand, Germany, Canada, Spain and Australia, we strongly request that the ***GEF Stakeholder Engagement Policy and associated Guidelines*** in addition to the ***GEF Guidelines on engagement with Indigenous Peoples*** are all updated to include clear policies and targets for active engagement and partnership with IPLC, Civil Society, women and youth. Without clear written policies on a Whole of Society Approach, guidelines will not give adequate support.

On the Results Framework: We encourage Participants to consider, within the Results framework and Policy Recommendations framework (Annex A): Clear targets and tracking mechanisms for CSO-led MSPs and FSPs; Transparent reporting on the share of GEF resources reaching IPLCs and local actors (building on the guidelines currently being developed for GBFF); Dedicated resources for capacity development for CSOs, IPLC, Women and youth to enable meaningful engagement across the project cycle.

Finally, we want to highlight that a true whole-of-society approach requires more than enabling language. It requires formalized roles, early engagement, and adequate resourcing, consistently applied across the GEF portfolio.