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CLIMATE
FUND**

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14 October 2024

Policy for results-based payments for REDD+ – Addendum I

Response matrix for Board comments received on the draft document

Summary

This document contains the response matrix for Board comments received on the draft document titled “Policy for REDD+ results-based payments” during the Board consultation period held from 11 to 22 September 2024.

Response matrix for Board comments received on the draft document “Policy for results-based payments for REDD+”

The draft document from the fortieth meeting of the Board titled “Policy for results-based payments for REDD+” was shared with Board members and alternate Board members for consultation from 11 to 22 September 2024. The Secretariat received feedback from the following:

1. Papua New Guinea
2. Belgium
3. Switzerland and Finland
4. France
5. Canada

The following table includes both the comments received and the Secretariat’s responses.

Document	Section	Country(ies)	Comment	Response from GCF Secretariat
IV. Policy Impact	Paragraph 13	Belgium	<i>[Paragraph 4, “unlike in the case of ex-ante payment modalities”:]</i> We should not support ex-ante payments in the land sector, which is subject to reversals risks and unpredictable outcomes. This is not allowed under UNFCCC Article 6.	Thank you. To enhance clarity the phrase has been revised as follows: “distinct from regular funding proposals providing “ex-ante” funding for planned forests activities”.
	Paragraph 14	Switzerland and Finland	<i>[Paragraph 14, “emissions from forests”:]</i> Do you mean “from deforestation and forests degradation”?	Thank you. The text has been revised accordingly.
	Paragraph 19	Switzerland and Finland	<i>[Paragraph 19, “verified”:]</i> “assessed”, not “verified”. This is an important point that was raised and agreed during the WS. It needs to be corrected in the policy.	Thank you. The text has been revised accordingly.
VIII. Monitoring and review	Paragraph 21	Switzerland and Finland	Monitoring and review of the portfolio results must be included, including through IEU.	Thank you. Reference has been added to periodic reviews of the resulting portfolio.



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Annex I: draft decision	Paragraph (b)	Papua New Guinea	Focus on funding gaps: At present, the voluntary carbon markets are crowding out higher quality UNFCCC credits, particularly for pre-2020 credits. Thus, the GCF should invest in both buying pre-2020 credits but also assisting to market them to corporates currently buying sub-standard VCS forestry credits that have non-existent financial transparency. <u>Current wording in the draft decision is satisfactory and gives flexibility for pre-2020 RBP results to be claimed for a 5-year period that commences 6 years before the GCF programming period (paragraph "B").</u>	Thank you. This is well noted.
	Paragraph (c)	Papua New Guinea	Avoid arbitrary pricing constructs: How are carbon prices determined? To be effective, they must overcome the opportunity costs of alternative land uses and the costs of addressing the drivers of deforestation. Those costs may vary by country or region, but they must be understood and incorporated into carbon pricing. <u>Current proposed price in the draft decision text is US\$8/tonne and I have inserted the wording of "fixed value subject to periodical revisions" (paragraph "C") so that price remains competitive.</u>	Thank you for this comment. Paragraph 9(b) of the draft policy (Annex II) captures both these elements (fixed value and subject to update) explicitly. For the purposes of streamlining the decision text, we therefore propose to retain the original language.
	Paragraph (c)	Papua New Guinea	<i>[Paragraph (c) to read as follows (proposed addition is underlined):]</i> "Further decides that, for the GCF programming period of 2024-2027 (GCF-2), a carbon price per tonne of carbon dioxide equivalent (CO2 eq) of reduced emissions or enhanced removals, fully measured, reported and assessed, consistent with UNFCCC methodological guidance and GCF requirements, shall be set <u>as a fixed value</u> at USD 8.00 <u>subject to periodical revisions;</u> "	
	Paragraph (d)	Canada	The way paragraph d in the decision text is currently worded may cause confusion around eligibility. We suggest adding clarification that the GCF Readiness	Thank you for this comment. The aim of this paragraph is to attract attention to the availability of GCF Readiness funds for this purpose. In the unlikely event that a country

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			and Preparatory Support Program can support eligibility “as required”.	not requiring readiness funds does apply, this can be addressed on a case-by-case basis by applying the GCF criterion of efficiency and effectiveness.
	Paragraph (e)	Papua New Guinea	<i>[Paragraph (e) to read as follows (proposed addition is underlined):]</i> “Requests the Secretariat to prepare relevant guidance and templates, building on the guidance and templates of the 2017-2022 pilot programme (<u>“decision B.18/07”</u>), to operationalize the Policy.”	Thank you for this suggestion. Decision 18.07 does not include guidance or templates. We have proposed retaining the original language.
		Switzerland and Finland	We recommend to specify in the decision text the cap of 15 MtCO ₂ eq per country.	Thank you. Given (i) the focus on streamlining the decision text, (ii) the fact that the 15 MtCO ₂ eq cap is already mentioned in the policy document (Annex II, paragraph 8), and (iii) the fact that the policy document also states explicitly that the country cap is subject to updates (Annex II, paragraph 9(a)), we suggest retaining the original draft decision text.
		Switzerland and Finland	We propose to also specify the cap (15 mtCO ₂ eq) in the decision itself: A cap on the maximum amount of REDD+ results per country to promote equitable access to REDD+ RBPs;	
Annex II: Policy for results-based payments for REDD+	Paragraph 2	Belgium	<i>[“In accordance with Article 5 of the Paris Agreement”:]</i> proposal to delete this reference as Article 5 of the PA does not include provisions for measurement, reporting and verification of REDD+ results, all of REDD+ reporting decisions are under the COP and not the Paris Agreement.	Thank you. Paris Agreement Article 5.2 encourages Parties to take action to implement and support the existing framework as set out in related guidance and decisions already agreed under the Convention for REDD+, which refers to the Warsaw Framework for REDD+ and includes all relevant decisions with provisions on measuring, reporting and verifying. Further to that, the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement decided that the technical annex with REDD+ results referred to in decision 14/CP.19, paragraph 7 shall be submitted as an annex to the biennial transparency report to be submitted by Parties under Article 13 of the Paris Agreement. Thus, the provisions on measuring, reporting and verifying REDD+ activities are firmly



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				incorporated into the Enhanced Transparency Framework under the Paris Agreement (Decision 18/CMA.1, paragraph 14).
	Paragraph 2	Switzerland and Finland	<i>[Paragraph 2, "verified":]</i> The term "assessed" should be used, as results submitted by countries did not undergo a verification.	The objective of this document is to set out specific policy provisions under the GCF for providing results-based financing for REDD+ results that have been submitted under Article 5 of the Paris Agreement and the decisions of the Warsaw Framework which refer to the terminology used here. We therefore suggest retaining existing language.
	Paragraph 4	Belgium	BE support for this very important para, avoiding double counting of REDD+ results between article 5 and Article 6 of the Paris agreement or article 5 and voluntary carbon market.	Thank you, well noted.
	Paragraph 5	Switzerland and Finland	<i>[Paragraph 5, "Countries receiving REDD+ RBPs through accredited entities (AEs)":]</i> Is there another way as through the AE? If yes, to be mentioned.	The channelling of funds through accredited entities (AEs) remains the sole modality of access for projects in the regular project and programme activity cycle of the Fund. We therefore propose retaining the original language.
	Paragraph 6(a)	Switzerland and Finland	<i>[Paragraph 6(a), "accompanied by due diligence report(s)":]</i> Where does it fit in the scorecard? What happens if non-compliance is reported (minor/major)?	Under the mainstreaming approach, similar to other funding proposals, the Secretariat will carry out necessary and appropriate second-level due diligence on REDD+ RBP funding proposals. This includes an assessment of the compliance with the GCF environmental and social safeguards and other policies listed in Appendix III, The Secretariat will only submit to the Board for its consideration those funding proposals that meet GCF policies.
	Paragraph 8	Belgium	Very clear BE support for this proposal, essential to reaching more equitable distribution.	Thank you, well noted.
	Paragraph 9	Canada	Paragraph 9 in the policy outlines that two or more elements will be for decision by the Board for each replenishment cycle: the cap on the maximum	Thank you for this comment. In order to keep the decision text streamlined, and in light of the higher likelihood of periodical revisions to



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			amount of REDD+ results per country, and a fixed value per tonne of CO ₂ e. However, one of these elements is outlined in the policy (paragraph 8) and one is outlined in the decision text (decision text paragraph c). It may be best to keep the numerical values that are subject to the Board's decision (i.e. 15 million cap on results proposed, along with \$8 price per tonne) within the decision text. For the policy text, we could make reference to a cap/price per tonne as per the decision text.	the price of carbon than the country cap, it was suggested that the former would be located in the decision text and the latter in the policy.
	Paragraph 9(a)	Belgium	Important addition	Thank you, well noted.
	Paragraph 9(a)	Canada	On paragraph 9a, we suggest wording to specify that the cap is on the "maximum amount of REDD+ results proposed to the GCF". It would be helpful to also clearly define what is meant by the cap on results proposed to the GCF	Thank you. Given that this clause uses the same language as in paragraph 8 just above, and given the need to streamline the text, we suggest maintaining the existing language.
	Paragraph 9(b)	Canada	If paragraph b of the decision text is meant to apply to each replenishment cycle, does it need to be in the decision text or should it be part of the policy?	Thank you. Paragraph (b) of the decision text specifies the price for the current cycle only, while paragraph 9(b) of the policy lists the price as one of the elements the Board might consider for each cycle. The two paragraphs are therefore complementary.
	Paragraph 9(b)	Canada	Paragraphs 9b. and 23 (step 4) should note CO ₂ -eq or CO ₂ e instead of CO ₂	Both paragraphs listed indicate "CO ₂ eq". This is the abbreviation used at GCF. To ensure consistency across GCF documentation we recommend retaining the existing abbreviation.
	Paragraph 9(b)	Canada	On paragraph 9b, it reads as if the value per tonne is to be consistent with UNFCCC methodological guidance and GCF requirements, when it should instead be the REDD+ results that are consistent with these. We suggest either removing "consistent with UNFCCC methodological guidance and GCF requirements" or clarifying that this is with respect to the REDD+ results.	Thank you for this comment. Misinterpretation appears unlikely as the UNFCCC methodological guidance and GCF requirements are silent on the value per tonne, so it can be inferred that the phrase refers to REDD+ results. We therefore suggest retaining existing language.



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	Paragraph 10	Canada	For paragraph 10, we suggest clarifying that “the final amount of <u>REDD+ results</u> to be paid for by the GCF will be determined [...]” since it is specifically the results proposed to the GCF that may be reduced due to the application of the scorecard results and available resources.	Thank you. Paragraph 10 specifically refers to the financial size of the REDD+ RBP project rather than the REDD+ results (emissions reductions or carbon removals) themselves, by placing RBP projects in a context of limited GCF resources. We therefore suggest retaining existing language.
	Paragraph 11(a)(ii)	Belgium	<i>[On the technical assessment:]</i> We should also encourage that the country submit, if necessary, a revision of the FREL/FRL in accordance with the result of the technical assessment	The guidelines and procedures for the technical assessment are contained in UNFCCC decision 13/CP.19 and its annex. In accordance with paragraph 14 of the annex to the COP decision, “the Party may modify its submitted forest reference emission level and/or forest reference level in response to the technical inputs of the assessment team.” The Lima REDD+ Information Hub shows that most countries have indeed used this possibility and provided a modified submission on the proposed reference level.
	Paragraph 11(b)	Switzerland and Finland	<i>[Paragraph 11(b), “technical analysis”:]</i> The term “technical analysis” is used for the UNFCCC review of the REDD+ monitoring and results submitted as an annex in the BUR/BTR. For the review of the FREL/FRL, the term “technical assessment” is used.	This is also the understanding of the Secretariat. Accordingly, the term technical analysis is used here since this sub-paragraph refers to the UNFCCC review of the REDD+ monitoring and results submitted as an annex in the BUR/BTR. Sub-paragraph 11 (a) (ii) refers to the FREL/FRL and the technical assessment of that document.
	Paragraph 11(c)	Belgium	<i>[“for ERs”:]</i> Clarification welcome: is this the right term? Does the country need to demonstrate how the link between national ambition and subnational results will be evaluated? Including in case of leakages, etc.	The emphasis here is on showing that the REDD+ activities for which payment is requested are fully incorporated into the national efforts and strategies. For subnational proposals this would not require harmonizing emission reductions at the subnational and national scales. Further guidance will be provided in the templates.



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	Paragraph 11(c)	Belgium	<i>[Paragraph 11(c) to read as follows (proposed addition is underlined):]</i> The scale of the REDD+ RBP proposal is national or, on an interim basis, subnational. Any subnational proposal shall be of significant scale, one political jurisdiction (e.g., states, provinces) or one ecosystem level (e.g., biomes, ecozones) down from a national scale and defined by each country. Subnational proposals shall demonstrate that an aggregation of such subnational scales can constitute the national level. Subnational proposals shall demonstrate a plan to scale up REDD+ implementation and the FREL to the national scale. The proposal shall further demonstrate that the subnational proposal contributes to the national ambition for ERs, including the NDC, <u>LTDS</u> and national REDD+ strategy. If a country submitted a previous subnational proposal, the subsequent subnational proposal shall represent a progression towards national-scale REDD+ by adding at least one subnational political jurisdiction (e.g., states, provinces), or, adding an ecosystem level (e.g., biomes, ecozones) of significant scale. Subnational proposals are also required to describe actions taken to address and monitor any resulting displacement.	The references to the NDC and the REDD+ strategy in the text are not exclusive, hence the term “including”, and proposals can refer to other strategic documents such as the long-term low-emission development strategy (LT-LEDS). Consistent with the need for a streamlined text, we would suggest retaining the original language.
	Paragraph 11(d)	Belgium	BE support for this para, this is the major outcome of the Global Stocktake for land sector! First recognition of this objective under UNFCCC.	Thank you, well noted.
	Paragraph 11(d)	France	This requirement should appear in the scoreboard.	Thank you for this comment. This was considered an eligibility criterion rather than a scoring element and as such, it was placed in section III. In drafting the policy, efforts were also made to limit duplication between the policy and the scorecard, which is why this criterion only appears once in the document, as do others in the same section.



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	Paragraph 11(f)	Belgium	BE support for this very interesting proposal; until now it is very difficult to have a clear vision on RBPs for forestry activities by country.	Thank you, well noted.
	Paragraph 15	Switzerland and Finland	<i>[Paragraph 15, "The Secretariat will consider such proposals along with other proposals by each country identified through GCF country programming";]</i> Applies only to voluntarily submitted concept notes (but why then the word "proposals") or to funding proposals? In the latter case, the sentence should be moved to Stage 2 (e.g. to paragraph 19).	As part of mainstreaming, all proposals, whether first submitted as concept notes or funding proposals, are considered along with other proposals by each country identified through GCF country programming, so the location of this sentence does not preclude funding proposals from being subject to such consideration. The sentence was added in this section to reflect the fact that this is most often conducted at an early stage, preferably at concept note stage.
	Paragraph 21	Switzerland and Finland	<i>[Paragraph 21 to read as follows (proposed addition is underlined):]</i> The funding proposal will be assessed against the criteria for assessing proposals for REDD+ RBPs, including the scorecard included in Appendix I, <u>existing guidance</u> , and GCF policies and procedures.	Thank you. The term "including" highlights the fact that the list of elements against which a funding proposal will be assessed is not finite. For the purposes of maintaining a streamlined text, we propose retaining the original wording.
	Paragraph 23, step 1	Switzerland and Finland	<i>[Paragraph 23 step 1 to read as follows (proposed addition is underlined):]</i> Step 1: The funding proposal proposes a volume of achieved ERs to be considered. <u>The proposed volume shall not exceed the defined cap.</u>	Thank you. Paragraph 8 already defines the cap. For the purposes of maintaining a streamlined text, we propose retaining the original wording.
	Paragraph 23, step 2	Belgium	Clarification welcome: It is a recognised good practice to combine tool for addressing reversals, but the provision leaves room for interpretation. Useful to specify how the discount of 10% is complementary with the monitoring, prevention and remediation of reversals.	In accordance with paragraph 71 of UNFCCC decision 1/CP.16 and its Annex, reversals are included under the safeguards for which information needs to be provided on how these safeguards are being addressed and respected. The analysis of the risks of non-permanence will therefore be included.
	Paragraph 23, step 2	Belgium	Belgium supports the idea of taking reversals into account, but necessity to clarify the para (it is not clear what happens if the reversals exceed 10% of the discount)	The draft policy adds requirements on top of the UNFCCC requirements. Paragraph 24 of the



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	Paragraph 23, step 2	France	The risk of non-permanence can be very high, particularly for activities that reinforce carbon sinks/absorption (planting, afforestation/reforestation, due to the impacts of climate change in particular). It would be important to recommend a prior analysis of the risks of non-permanence for each mitigation activity generating emission reductions. Some activities that are too risky could be ineligible, or require a higher percentage of the share reserved to compensate for the risk of non-permanence. In addition, criteria should be added to ensure the permanence of reductions and removals over the long term, and to ensure, for example, that if a change in a country's policy leading to an increase in deforestation were to occur after a payment for results has been made, the host country would be held responsible and could no longer access payments thereafter (or apply a deduction corresponding to emissions after payment or a refund of payments).	<p>policy requires countries that submit a funding proposal to show that they have positive results for the whole 5-year result period. In addition, to address the risk of long-term reversals, the policy requires that a default 10% of the results are subtracted and that countries provide, as part of their funding proposal, a description of 1) measures and actions taken to address the risk of reversals, including but not limited to risks related to governance, policy, and natural disturbances; and 2) ongoing actions to monitor, prevent, and address reversals.</p> <p>Similar to other (non-RBP) funding proposals, information on long-term sustainability of the activities is submitted ex-ante, so there is no requirement to keep reporting on reversals in the long term beyond the project lifetime.</p>
	Paragraph 23 step 2	Belgium	<i>[Paragraph 23, step 2 to read as follows (proposed addition is underlined):]</i> Step 2: From the proposed volume of ERs, a percentage of the volume will be subtracted to address the risk of reversals. The percentage to be subtracted to address the reversal risk is 10% for all proposals. Countries shall provide, as part of their funding proposal, a description of 1) measures and actions taken to address the risk of reversals, including but not limited to risks related to governance, policy, and natural disturbances; and 2) ongoing actions to monitor, prevent, and address <u>and reversals in full</u> . The volume subtracted to address the risk of reversal will be deducted by the country.	<p>Thank you for this suggestion. We interpret that the suggested addition of “full” in the text is related to the comment above on a situation where the reversals exceed 10% of the discount. As per the response above, there is no requirement to keep reporting on reversals in the long term. We therefore suggest retaining the original language.</p>
	Paragraph 23, step 3	Belgium	The project proposal should also include an assessment of leakages (displacement of emissions	Paragraph 11(c) states that “Subnational proposals are also required to describe actions taken to address and monitor any resulting

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			outside the boundary of the activity) and include a discount in accordance	displacement.” In the discussions that resulted in the proposed policy, it was not suggested to have discounts for leakage/displacement in addition to these requirements already in place.
	Paragraph 23, step 4	Canada	Paragraphs 9b. and 23 (step 4) should note CO ₂ -eq or CO ₂ e instead of CO ₂	Both paragraphs listed indicate “CO ₂ eq”. This is the abbreviation used at GCF. To ensure consistency across GCF documentation we recommend retaining the existing abbreviation.
	Paragraph 23, step 5	Belgium	Support for an additional valorisation of co-benefits	Thank you, this is well noted.
	Paragraph 23, step 5	Switzerland and Finland	<i>[Paragraph 23 step 5, “deliver non-carbon benefits beyond the Cancún Safeguards”:]</i> What does that mean? Should be specified in an additional guidance, restrictive enough so that not all proposals ± automatically qualify (as it was the case in the pilot programme).	Thank you. This will be further developed in the guidance to be produced subsequent to Board approval of the policy.
	Paragraph 24	Switzerland and Finland	<p>Quite complicated paragraph. And it does not prevent countries from omitting initial years of a result period in their proposals, if the emissions there were above the FREL/FRL. Could something like this solve the problem?</p> <p>Countries that submit a funding proposal are obliged to report results for the entire result period. If no results are available for certain years at the time of submission, 12% of the tonnes eligible for payments allocated to the country under the funding proposal will be temporarily set aside (“the set aside”). If at a later date results are available in UNFCCC TATR for the whole results period, the following applies:</p> <p>a) if net emissions and removals of the years of the result period that were not covered by the</p>	<p>The paragraph is complicated as it attempts to address multiple scenarios depending on data available. The 12% set-aside is specifically meant for countries which do not yet have results for the entire result period. Making it mandatory to report results for the entire results period could significantly restrict access to GCF REDD+ RBPs.</p> <p>For this reason, the current text was drafted and we suggest retaining it.</p>

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			<p>proposal are below the FREL/FRL (no reversals) the set aside will be fully disbursed.</p> <p>a) if net emissions and removals of the years of the result period that were not covered by the proposal are above the FREL/FRL (reversals), these reversals will be offset against the set aside and the remainder (if any) is disbursed. If the net emissions and removals for the remaining years are in excess of the number of tonnes in the set aside, the set aside will not be disbursed. Any excess will be deducted from any potential future RBP proposal to GCF</p>	
	Paragraph 24(a)	Switzerland and Finland	Why should existing results not be shown in the proposal? Such intransparency should not be accepted in my view.	The sub-paragraph requires countries to submit information on the results without requiring the results to be included as part of the funding proposal. The policy assumes it is not mandatory for countries to include all their results in the funding proposal to the GCF as countries might seek payments from other sources (also considering the cap on payments proposed in the policy). In this light, we would suggest retaining the current language.
	Paragraph 25	Switzerland and Finland	<i>[Paragraph 25 to read as follows (proposed addition is underlined):] After the second-level due diligence and completion of the review done by the Secretariat, the independent Technical Advisory Panel (iTAP) will assess the funding proposal using the scorecard provided in Appendix I and <u>specific guidelines developed by the Secretariat</u>. The iTAP should ensure relevant expertise for the review of the proposal, through the use of experts on land use, land-use change and forestry (LULUCF) selected from the UNFCCC roster of experts with experience in REDD+ assessment and analysis, including Indigenous Peoples' issues. Host countries may interact with the Secretariat and iTAP in conjunction with AE</i>	As part of mainstreaming REDD+ RBPs, the due diligence process for reviewing REDD RBP funding proposals is aligned with that of other funding proposals in the GCF pipeline. In this respect, specific guidelines will be developed by the Secretariat to guide AEs, the Secretariat and iTAP and ensure consistency. Given that the decision text already refers to such guidance in a prominent fashion, in an effort to streamline the text we suggest retaining the current language.

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			regarding clarifications about the scorecard topics, especially related to the REDD+ requirements.	
	Paragraph 26	Switzerland and Finland	<i>[Paragraph 26 to read as follows (proposed addition is underlined):]</i> The Secretariat will provide the Board with a proposed amount of RBPs based on the results of the application of the scorecard by the Secretariat and iTAP <u>and other criteria used for allocating funds under the project and programme activity cycle.</u>	Paragraph 7 of the draft policy already states that “the total funding allocated to REDD+ RBPs under each programming period of the Fund will be determined in alignment with the relevant programming period’s Strategic Plan and the investment strategy and portfolio targets set out in the GCF Investment Framework.” In an effort to streamline the text, we proposed retaining the current text.
	Paragraph 27	France	Greater transparency on fees charged by accredited agencies is required. Board members should be able to access information and ideally refuse excesses.	As a result of mainstreaming REDD+ RBP proposals into the regular project and programme activity cycle of the Fund, the Board will be able to access information on AE fees for REDD+ RBP proposals, like it does for all other proposals.
	Paragraph 35	Switzerland and Finland	<i>[Paragraph 25 to read as follows (proposed addition is underlined):]</i> The policy <u>and portfolio results</u> will be subject to periodic reviews, allowing elements to be adjusted according to additional considerations such as lessons learned and GCF’s strategic plan, programming allocations, and priorities.	As part of mainstreaming, REDD+ RBP projects will be subject to final evaluations like other projects in the GCF portfolio. In any year, the Board can mandate the IEU to conduct an evaluation of any part of the GCF portfolio, including REDD+ RBPs. We suggest retaining the current language which empowers the Board to commission such evaluations.
Appendix I: scorecard	Section 1a(iii)	Belgium	<i>[(iii) Is the FREL/FRL based on historical data and is it equal to or below the average annual historical emissions during the reference period?]</i> This is the most important point from an environmental integrity point of view. The GCF should not finance RBPs that are calculated based on a FREL/FRL whose value is higher than the historical emissions during the référence period, with the exception of HFLD adjustment not exceeding 0.05% of carbon stock and 10% of the FREL/FRL	Thank you, this is indeed how the scoring for this element was designed.



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	Section 1a(iii)	France	To ensure real additionality of mitigation activities and pay for real emission reductions, downward adjustment of baselines is requested, so that they correspond to a net emission trajectory equal to zero	<p>Thank you. As part of the financial mechanism of the UNFCCC, GCF builds on decisions agreed by the 198 Parties to the Convention, including the Warsaw Framework. This includes the FRELs/FRLs submitted to and technically assessed by the UNFCCC as part of the REDD+ process.</p> <p>Additionality is also enhanced in this policy by a series of elements, including the 10% subtraction to address the role of reversals, the use of the scorecard itself, and the country cap which means that many countries will only be able to submit a fraction of their results.</p>
	Section 1b(ii)	Belgium	<i>[(ii), "consistency":]</i> Very important! Same remark as before (the consequence should be important) this is a crucial point from REDD+ revision, if consistency is not demonstrated, it is impossible to assess the results (compared to the FREL/FRL).	Thank you, this is well noted.
	Section 1(b)(vii)	Switzerland and Finland	<i>[text for score 0 is replaced with the following text; new text underlined]</i> 0: No information on <u>aggregated uncertainty</u> is provided	Thank you. For greater consistency with other scores (1 and 2), the text has been revised accordingly.
General		Belgium	Belgium underlines the importance for forest countries to have access to results-based finance for forest activities. These funds represent a real added value from a climate change perspective as they allow the host country to use the result towards its NDC (no offsetting)	Thank you. This is well noted.
		Belgium	Belgium underlines the importance of an equitable sharing of the funds between the forest countries (until now the only African country having received funds from GCF REDD+ RBPs is Gabon)	Thank you. Consistent with Annex II, paragraph 7, the Secretariat will aim for appropriate geographical balance and equitable access by a range of countries, effectively applying the same approach to the REDD+ RBP pipeline management as for the rest of the Fund's pipeline.



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				In fact, no African countries have benefited yet from the GCF REDD+ RBP pilot programme, although at B.39 the Board decided on an exceptional basis to allow Uganda's REDD+ RBP concept note to be submitted as a funding proposal under the pilot programme (decision B.39/13 paragraph (e)).
		Belgium	Belgium supports the mainstreaming approach proposed by the GCF	Thank you, well noted.
		Belgium	Belgium fully supports the eligibility criteria, in particular the fact that the FREL must be equal or below the historical average of emissions (guarantee of the quality of the results)	Thank you, well noted.
		Belgium	Belgium encourages also to consider displacement emissions (leakages) in the quantification of the results (was part of the previous version)	<p>Paragraph 11 (c) states that "Subnational proposals are also required to describe actions taken to address and monitor any resulting displacement." In the discussions that resulted in the proposed policy, it was not suggested to have quantified discounts for leakage/displacement in addition to the requirements of paragraph 11 (c). This is in line with previous versions, consistent with decision B.39/13 paragraph (b) which requests the proposal to build "on consultations conducted following decision B.35/12, paragraphs (b) and (c)".</p> <p>In the pilot programme, displacement was not quantified either. Actions to reduce displacement were included as one of the criteria in the section on the Cancún safeguards (section 3a of the second phase scorecard). This was also the case in the proposal that was discussed at B.37 although actions to address displacement were also included there as an eligibility criteria.</p>

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		Belgium	Belgium supports the framework for avoiding double counting	Thank you, well noted.
		Switzerland and Finland	<p>We fully support the continuation of the REDD+ RBP within the regular GCF project and program cycle ("mainstreaming"). The present proposal of a policy for the integration of REDD+ RBPs into the regular GCF Project and Programme Cycle is a major step forward in this direction.</p> <p>We welcome the increased requirements for the environmental integrity compared to the pilot phase and agree with the proposed set price at USD 8 per ton CO₂eq. We also welcome the maximum 15 MtCO₂ eq per country.</p>	Thank you. This is well noted.
		Switzerland and Finland	We still have concerns about the verification of results submitted. Despite the increased requirements for the environmental integrity of the results submitted to the GCF under this new policy, there is still a possibility that countries may submit inflated figures through the UNFCCC technical assessment and that the GCF may then compensate for "hot air" rather than true results. An anchored monitoring and evaluation mechanism is thus central to (randomly) verify results on the ground. Regular evaluation should also include the use of proceeds in the various projects.	This draft GCF policy for REDD+ RBPs is designed to build on the process under the UNFCCC, including the technical assessment of the FREL/FRL and the technical analysis of the results. These processes resulted from UNFCCC decisions achieved through consensus among the 198 Parties to the Convention. The legitimacy of these processes was further increased by the inclusion of the complete framework of decisions in Article 5.2 of the Paris Agreement. As a result, we suggest retaining the current formulation.
		Switzerland and Finland	With regard to the assessment process of the proposals, we recommend developing a guidance on i) compliance with GCF policies and what would happen if non-compliance (minor/major) is reported; ii) how the Secretariat and iTAP will assess price bonus for non-carbon benefits beyond Cancún Safeguards. This could be mentioned under §12 or §15 b). We would like to be consulted on the guidance when available.	Thank you for this suggestion. Guidance will be provided by the Secretariat as a separate and subsequent document if the draft policy is approved. The Secretariat would be happy to discuss further with Switzerland and Finland on these points.



Document	Section	Country(ies)	Comment	Response from GCF Secretariat
		Switzerland and Finland	In §13, the wording “independently verified” has to be corrected as discussed and agreed during the experts’ technical workshop and replaced by “independently assessed”. Same in Annex II, §2, “reported and verified” shall be replaced by “reported and assessed”.	Thank you. Paragraph 13 has been revised. Regarding Annex II, paragraph 2, see the Secretariat’s response above.
		Canada	Canada requests that the Secretariat ensures that the REDD+ results-based policy aligns with the draft Revised Accreditation Framework (RAF). This alignment is crucial to ensure that the changes proposed in the REDD+ results-based policy, particularly regarding the funding proposal and funded activity agreement templates, are coherent with the assessments that would now be done at proposal stage under the RAF (notably the ESS check, policy review, and legal review).	Thank you for this pertinent comment. The RAF foresees the reallocation of risk controls at the appropriate time in the GCF programming cycle. This would include, <i>inter alia</i> , streamlining requirements at entry level based on fiduciary and ESS standards and gender requirements to focus on an institutional fit of an applicant to engage with GCF. Upon approval of the REDD+ RBP policy, templates will be developed in alignment with the relevant accreditation framework. As part of preparatory and implementation arrangements, the RAF also foresees the integration of the accreditation framework and associated policy changes into existing operational procedures and guidance.