



Pacific
Community
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Steering our own *va'a*

Pacific lessons in accessing climate finance

Lessons learnt paper: Experiences and challenges of Pacific Island development banks in navigating social and environmental management in Green Climate Fund accreditation and project design.

The Pacific Community (SPC)
Climate Finance Unit
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Abbreviations

AF	Adaptation Fund
BCI	Bank of the Cook Islands
DAE	Direct Access Entity
DB-LX	Development Banks Learning Exchange
DBs	Development Banks
DBS	Development Bank of Samoa
ESMS/F/P	Environmental and Social Management System/Framework/Plan
ESS	Environmental and Social Safeguards
FDB	Fiji Development Bank
FSM	Federated States of Micronesia
FSMDB	Federated States of Micronesia Development Bank
GAP	Gender Action Plan
GCF	Green Climate Fund
GESI	Gender Equity and Social Inclusion
GEDSI	Gender Equity, Disability and Social Inclusion
GRM	Grievance Redress Mechanism
MEL	Monitoring, Evaluation and Learning
NDA	National Designated Authority
PMF	Performance Measurement Framework
PSIDS	Pacific Small Island Developing States
SEP	Stakeholder Engagement Plan
SIDS	Small Island Developing States
SPC	Pacific Community
TDB	Tonga Development Bank

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Executive summary

The Pacific Development Banks Learning Exchange (DB-LX), facilitated by the Pacific Community (SPC), brought together representatives from five Development Banks in the region that were at the time accredited or seeking accreditation to the Green Climate Fund (GCF) – the Fiji Development Bank, Federated States of Micronesia (FSM) Development Bank, Bank of the Cook Islands, Development Bank of Samoa, and Tonga Development Bank – to share lived experiences in navigating access to climate finance, particularly from the GCF.

This ‘lessons learnt’ paper captures the practical insights, challenges and strategies shared by these institutions as they engage with GCF processes and strengthen their social and environmental management systems, focusing on Environmental and Social Safeguards (ESS), Gender Equity and Social Inclusion (GESI) and Monitoring, Evaluation and Learning (MEL).

Participants in the DB-LX emphasised the need to *start from where we are*, building on existing systems rather than merely replicating donor structures or definitions. They stressed that *readiness support must be used strategically*, not to create parallel systems but to strengthen what is already effective. They acknowledged that *deep socio-cultural knowledge of the Pacific is a strength* and that embedding it into project design and delivery is essential for legitimacy, trust and sustainability. They reflected on a mindset shift to *design for implementation*, not just for approval, using appropriate tools to integrate ESS, GESI and MEL in a coherent, streamlined manner. And they highlighted the need to *strengthen partners’ understanding of Pacific Island realities* to ensure that climate finance delivery is genuinely fit for purpose and locally led.

From these reflections, DB-LX participants felt the need to educate external partners about the region’s context and systems; streamline and consolidate ESS, GESI and MEL knowledge to reduce duplication; invest in relationships and trust stakeholders with deep understanding of the socio-cultural context; integrate social and environmental management and MEL systems through practical, implementation-ready tools; and institutionalise peer learning and regional collaboration as core to Pacific capacity-building.

Together, these lessons offer a clearer path for Pacific institutions to better navigate their own climate finance journeys, using approaches and systems that are context-driven, peer-informed, and built for implementation.



Background

The Pacific Development Banks Learning Exchange (DB-LX), facilitated by the Pacific Community (SPC), was held in Fiji's capital city Suva, over three days in January 2025 convening representatives from five Pacific Development Banks accredited to, and nominated for accreditation to, the Green Climate Fund (GCF) to share experiences in navigating access to climate finance. Sixteen representatives attended and brought to life the many aspects of Pacific progress but also issues in facilitating access to climate finance. As one of our participants said:

When I started at the bank, we knew that the bank's services were not yet reaching all of the people that we're mandated to serve.

Each of our states has a different culture, different languages, different priorities. Consultation on our internal policies and practices takes time but it is an absolute must. We need to listen, to respect everyone's views and get input from everyone, despite the transportation challenges.

We worked to find commonalities and anchor the policy in those in order to target financing products appropriately. And we need to consistently monitor our gender strategy to track progress and make sure finance is reaching those that need it. That's my role at the bank.¹

These words are from Norleen Oliver, a gender specialist at the Federated States of Micronesia Development Bank (FSMDB) in the Federated States of Micronesia (FSM), a Pacific Island country of more than 600 islands spread across almost three million square kilometres of ocean that is home to significant biological diversity and important fisheries. More than 60 islands are inhabited across four semi-autonomous states, from east to west – Yap, Chuuk, Pohnpei, Kosrae – each with its own geography, ecology, language and culture.²

Norleen's move from her previous role as the Head of Social Services within the national government to her current position with FSMDB was met with some confusion. "What are you doing working at the bank?" former colleagues would enquire. She responded that – as a technical specialist for gender equity, diversity and social inclusion – she supports FSMDB to be more responsive to the needs of all FSM citizens across all four states, in all of their linguistic and cultural diversity – and that takes time. It also takes commitment from leadership within FSMDB as well as specialist expertise from within the country to build appreciation of the nuances of what 'inclusion' means in a country with four states that are geographically dispersed and culturally distinct.

1. Norleen Oliver (FSM Development Bank). Presentation at DB-LX (Suva, Fiji) – 14 January 2025.
2. SPC (2020). Cultural Etiquette in the Pacific.

This context resonates across the Pacific. And it is within this context that Development Banks play a critical role in ensuring equitable access to resources and finance for smaller, indigenous and/or women-led enterprises investing in climate-smart agriculture, water infrastructure and low-carbon energy. They are well placed to do this because they understand how to adapt processes and products to existing social norms to overcome barriers and cover ‘the last mile’. As the climate challenge becomes more urgent, Development Banks such as FSMDB and technical specialists such as Norleen are essential in enabling financial access for those most impacted and most able to support a just transition.³ Yet it is well documented that accessing climate finance can be challenging,⁴ particularly for Pacific Small Island Developing States (PSIDS) such as FSM and local entities such as FSMDB.

To address this need, SPC supports access to climate finance for its members, particularly from multilateral funding mechanisms such as the Adaptation Fund and the Green Climate Fund (GCF).⁵ Among other key initiatives, SPC currently implements the GCF-supported Regional Readiness Programme *Building capacity of regional direct access entity and national designated authorities to foster climate action in the Pacific* to enhance capacities of National Designated Authorities (NDAs) and Direct Access Entities (DAEs) to engage with climate finance processes and address their national

climate change priorities – through training facilitation, fit-for-purpose technical expertise and knowledge sharing amongst diverse stakeholders within the climate finance space in the Pacific (see Annex 3).

The DB-LX provided a platform for the five Development Banks from the region – FSMDB, Bank of the Cook Islands (BCI), Development Bank of Samoa (DBS), Fiji Development Bank (FDB) and Tonga Development Bank (TDB) – to *talanoa* on achievements and challenges in accessing global climate finance. The participants discussed lessons on social and environmental management, specifically related to Environmental and Social Safeguards (ESS), Gender Equity and Social Inclusion (GESI), and Monitoring, Evaluation and Learning (MEL), recognising their relevance and value as core elements for securing GCF accreditation and developing projects.

This lessons learnt paper captures the experiences and challenges of Pacific Development Banks in navigating social and environmental management (ESS, GESI and MEL) in GCF project design, implementation and monitoring. It further documents how project staff and technical specialists involved in social and environmental management gained further understanding of the roles, responsibilities and concrete actions needed to enhance access to climate finance for the Pacific.



3. UNEP and ILO (2024). *Incorporating Just Transition Considerations into Financial Sector Transition Planning*.

4. Treichel, P., et al. (2024). *Scale and Access to the Green Climate Fund: Big challenges for small island developing States*.

5. See <https://www.adaptation-fund.org/>, <https://www.greenclimate.fund/>, and Annex 3.

Climate finance in the Pacific Islands: An overview

Small Island Developing States (SIDS) are amongst the lowest contributors to the causes of climate change, yet they suffer disproportionately from its adverse effects.⁶ As climate change becomes an increasingly urgent challenge with impacts felt across all sectors of society, the Pacific continues to bear the brunt of more extreme events, increasingly frequent and intense cyclones, sea-level rise, and coastal inundation.⁷ Adapting to these changes and supporting a shift to a low-carbon future requires financial and technical support that should not be drawn from national budgets.⁸

The 2016 Paris Agreement on climate change seeks to address this under Article 9 by securing commitments from developed nations to financially assist developing countries in their adaptation and mitigation actions against climate change.⁹ Despite these commitments, there are significant constraints on PSIDS' access to climate finance and their ability to benefit from it. And despite funding and efforts over the past few decades, PSIDS are failing to reach sustainable development goals under international instruments¹⁰ – in part, according to a United Nations Development Programme 2021 discussion paper, because “much of this climate finance is not being accessed and used in a way that efficiently and effectively achieves its intended climate-resilient development objectives”.¹¹

At the 2024 United Nations Climate Change Conference, one of the key objectives of Pacific nations was to secure commitments that would improve the region's access to climate finance.¹² A commitment to a New Collective Quantified Goal on Climate Finance included to triple climate finance for developing nations to USD 300 billion by 2035 and mobilise USD 1.3 trillion annually from public, private and other innovative sources.¹³

In July 2025, the International Court of Justice (ICJ) delivered its landmark advisory opinion on “the obligations of states with respect to climate change”. As summarised by the International Institute for Sustainable Development, “The ICJ determined that the 1.5°C temperature target is legally binding under the Paris Agreement and that all states, in particular the largest emitters, must take ambitious mitigation measures in line with the best available science”.¹⁴

During public hearings in December 2024, SPC's Director of Climate Change and Sustainability Coral Pasisi reminded the ICJ of the shortcomings of the international climate finance architecture to reach the most vulnerable.

*[The] achievement of the 16-year-old global promise of 100 billion dollars per annum by 2020 is still debated. Creative accounting has essentially conflated compatible finance flows related to Article 2(1)(c) with commitments under Article 9 [of the Paris Agreement]. Furthermore, the special vulnerabilities and capacities of small and vulnerable states such as our SIDS have not been operationalised sufficiently. This is clearly evidenced in the miniscule access to climate finance for SIDS to date, in total receiving just 3% of that 100 billion dollar promise and only 0.22% – not even 1% – for Pacific SIDS.*¹⁵

This is evidenced by a Pacific Islands Forum Secretariat (PIFS) report, which showed that for 2010–2021, PSIDS received a total of USD 2.2–3.4 billion in climate finance.¹⁶ In a separate paper, PIFS estimated that climate finance received annually by 11 Pacific Island countries in the region was USD 220 million.¹⁷ At these rates, the volume of committed and previously-secured climate finance is inadequate to deal with the challenge ahead.¹⁸

6. World Meteorological Organization (2024). *Climate change transforms Pacific Islands*.

7. Morgan, W., et al. (2024). *Leading from the Frontline: A History of Pacific Climate Diplomacy*.

8. Prasad, B. (2023). *Opening Address to the Australasian Aid Conference*.

9. UNFCCC (n.d.). *Climate Finance in the negotiations*.

10. Soanes, M., et al. (2021). *Principles for Locally Led Adaptation: A call to action*.

11. UNDP, UK FCDO, PIFS (2021). *Climate finance effectiveness in the Pacific: are we on the right track?*

12. PIFS (2024). *Pacific's Push for Just Transition and Climate Finance at COP29*.

13. UNFCCC (2024). *COP29 UN Climate Conference Agrees to Triple Finance to Developing Countries, Protecting Lives and Livelihoods*.

14. IISD (2025). *Historic International Court of Justice Opinion Confirms States' Climate Obligations*.

15. Pasisi, C. (10 February 2025). *The International Court of Justice holds public hearings in the advisory proceedings on Climate Change*. [Video, 42:54-55:25].

16. PIFS (2024). *Information Paper No. 11: Climate and Disaster Risk Finance*.

17. PIFS (2022). *Agenda Item 6A: Climate Change Finance*.

18. Reitmeier, L. and Dookie, D.S. (2024). *Small Island Developing States need innovative forms of finance to bridge the devastating 'adaptation gap'*.

Accessing climate finance from the Pacific context

A global synthesis report about climate finance access by the GCF's Independent Evaluation Unit (IEU) found that overall access through the GCF is “slow” and “biased”, with disproportionately more access by international organisations than locally-led institutions.¹⁹ As of May 2024, 69 out of 131 accredited entities had not implemented any projects, indicating that securing GCF accreditation did not immediately equate to the development, let alone approval, of funding proposals. The ‘insufficient’ institutional capacity of DAEs (‘local-level actors’) was determined as a key challenge,²⁰ exacerbated by GCF requirements assessed as too high or onerous, and the GCF process as too slow and cumbersome. The recommendations of the study urged change within the GCF – especially its process and requirements – calling for contextualisation, fund complementarity and locally-led approaches (‘localisation’).

Notably, the ‘local’ Pacific experience is not detailed in this key study – the word ‘Pacific’ is found only twice in the paper, both times in the annexed bibliography. Yet many of the region’s challenges and hard-earned lessons in GCF accreditation and project development are consistent with the findings of the IEU report. This leaves a present and compelling opportunity to surface, unpack and document these insights, centred on Pacific DAEs’ experiences and voices.

The Fiji Development Bank (FDB) secured GCF accreditation as a national DAE in 2017, FSM Development Bank (FSMDB) in 2023 and Bank of the Cook Islands (BCI) in 2024. The accreditation journeys of Development Banks entailed inter-alia the GCF-mandated development of sufficiently robust gender policies and environment and social management systems – lengthy, resource-intensive endeavours that generated many lessons along the way. To share, listen and learn from such lessons, these accredited Development Banks – along with the Development Bank of Samoa (DBS) and the Tonga Development Bank (TDB) – came together as a Pacific family to *talanoa* at the DB-LX, developing relationships and helping each other to work more collectively. With support from SPC, the DB-LX convened Development Bank staff with a range of expertise (loan managers, financial product experts, gender specialists, green finance managers) who play a role in transitioning the banks’ systems to respond

to the climate change needs of their customers, and simultaneously meet GCF standards in the process.

Development Banks are typically mandated to provide finance for businesses and projects to support broader economic and social development goals; this distinguishes them from commercial banks that prioritise profit. As Development Banks tend to cater to smaller businesses and organisations that struggle to access resources from commercial banks, they have often already explored ways to respond to the climate challenge and play proactive roles in channelling finance from larger institutions such as the GCF towards smaller businesses, organisations and households in the Pacific.

Development Banks and the financing services they provide are a vital conduit for financing to reach ‘the last mile’. In the Pacific, the customer portfolio of most Development Banks consists of large numbers of small businesses – farmers and fishers, handicraft producers, small retailers and tourism businesses – all of whom need support to adapt to climate change. This may take the form of supporting a farmer with a loan to invest in drip irrigation technology, a fishing cooperative to purchase a solar-powered ice plant, or a tourism business to expand its water storage capacity. These are the types of adjustments that eventually all businesses, small and large, will have to make.

However, dealing with the impacts of climate change and transitioning to greener economic solutions requires finance. DAE Development Banks can use multilateral climate finance mechanisms to expand their financing portfolios while also strengthening climate resilience, but access is not the only bottleneck that prevents effective and inclusive adaptation and mitigation. A gender-responsive, socially-inclusive and environmentally-sensitive approach is necessary to meet the differentiated needs of diverse at-risk communities that access financial products through the bank – yet this crucial and comprehensive Social and Environmental Management Approach requires systems, and the systems require people, time and (oftentimes) political will.

The Pacific is characterised as a ‘small’ region in terms of population and land area, but ‘smallness’ is a strength – in this case, it allows for strong social and cultural networks that can support generous, candid and evidence-based learning to address common challenges through lesson-centred peer exchanges such as the DB-LX.

19. IEU (2024). IEU Synthesis on Access in the GCF.

20. Ibid, p. 16.

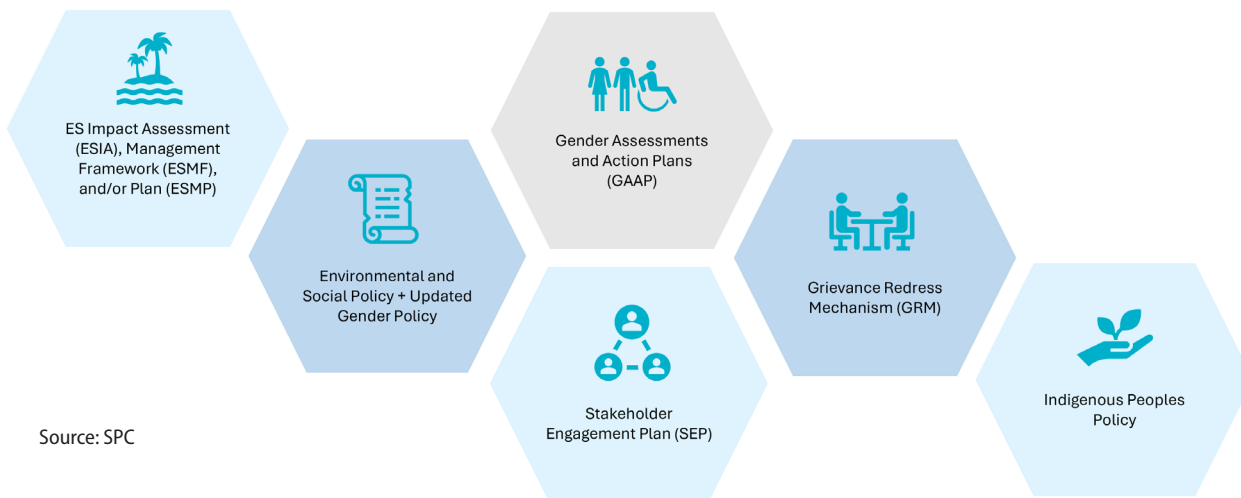
Lessons learned



Lesson 1: Start from where we are

According to the GCF IEU access study, “donor requirements complicate direct access because they entail the reconfiguration of institutions and the accumulation of the initial resources necessary to develop capacity that will meet donor (including GCF) standards. In other words, local institutions are required to imitate or mimic the “donor” in order to receive funds for operations”.²¹ Figure 1 shows how SPC has responded to this context in its climate finance approach.

FIGURE 1. Pacific Community (SPC) climate finance approach: Integrating Gender Equity and Social Inclusion (GESI), Environmental and Social Safeguards (ESS) and Stakeholder Engagement Policies and Templates



Source: SPC

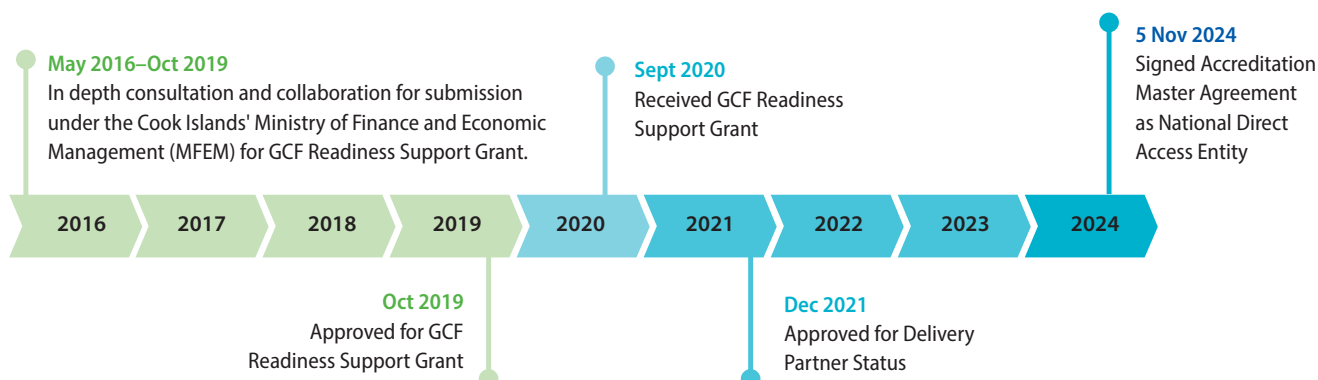
Climate finance donors, institutions and partners require robust ESS and GESI systems from DAEs for them to access resources. In the GCF, accreditation mandates the existence of: an existing institutional Environmental and Social Management System (ESMS); a budgeted Gender Policy or close equivalent; and an organisational and operational Grievance Redress Mechanism (GRM). Consequently, a full-funding proposal necessitates separate annexes with varying levels of technical complexity: an Environmental and Social Impact Assessment with a commensurate ESMS, framework or management plan contingent on the project's ESS risk category; a gender assessment and action plan with sex-disaggregated project indicators and a dedicated budget; a stakeholder engagement plan detailing inclusive consultations and Free, Prior, and Informed Consent particularly when engaging Indigenous Peoples; and an MEL plan. These annexes are often developed independently and simultaneously by contracted consultants to meet the precise deadlines of a GCF proposal development timeline.

The banks that had achieved GCF accreditation (FDB, FSMDB, BCI) confirmed that fulfilling and operationalising GCF's ESS and GESI requirements in the accreditation process required much work to strengthen internal systems – but stressed the importance of building on the foundations that exist. Figure 2 illustrates how BCI approached it.

21. IEU (2024). IEU Synthesis on Access in the GCF.

FIGURE 2: Bank of the Cook Islands’ accreditation journey as presented during the Development Banks Learning Exchange (DB-LX)

An effort-intensive journey of eight years



Source: Bank of the Cook Islands (BCI)

Most of the development banks have GESI or Gender Equity, Disability and Social Inclusion (GEDSI) policies in place but a common challenge is integrating the policy or framework into the job descriptions and functions of staff within the bank. MEL implementation is the most advanced across the board, with four of the development banks having officer positions or draft versions of supporting systems or policies. Internal ESMSs may exist, but their full operationalisation can be restricted by funding limitations.

Sometimes these systems may be incomplete or undocumented in standard operating procedures, but DB-LX participants emphasised that this does not mean the foundations are not there. For example, as customer-facing institutions all development banks have a form of a GRM – customer service and responsiveness to clients and partners’ feedback is a core part of their roles – but it is not necessarily labelled as a GRM as required and reviewed by the GCF.

Financing institutions will come up with lots of complex words that describe what’s needed, but if you’re clear on how you will implement things, it is easier to talk to them. They may put a plan in front of you, but you can advocate for building on existing systems.

For example, we were doing MEL. We really needed to understand the GCF expectations of all the MEL functions. To operationalise and strengthen our MEL systems to support accreditation, we already had our own ideas of how to do it, but it is important to know what is expected before you embark on system reform.

And it is important to always do it for your own organisational benefit, not just for accreditation.²²

The existing understanding of Pacific Development Banks of the socio-cultural context – gained through lived experience and daily interactions with customers – means they are well-placed to develop ESS, GEDSI and MEL systems and policies that are contextualised to the country. At the DB-LX, participants encouraged each other to build on their own existing systems when endeavouring to meet ESS and GESI requirements, as this makes it much easier to then operationalise. Adopting this approach and integrating their deep socio-cultural understanding into project design and implementation was emphasised as being vital to delivering initiatives successfully and achieving positive changes for communities.

22. Teruautu Ringi (Bank of the Cook Islands). Presentation at DB-LX (Suva, Fiji) – 14 January 2025.

Lesson 2: Leverage readiness support to strengthen, not duplicate systems

The GCF IEU access study confirms that “the divergence of fiduciary standards, ESS, gender policies and other relevant requirements require partners to follow multiple paths for different funds. There are many key steps that these funds could take to enhance their complementarity ... At COP29, the GCF and other funds issued a joint statement that includes considerations of access and impact, including some of the considerations above. The joint statement remains to be reviewed by the governing bodies of the funds, and its action plan is under development”²³

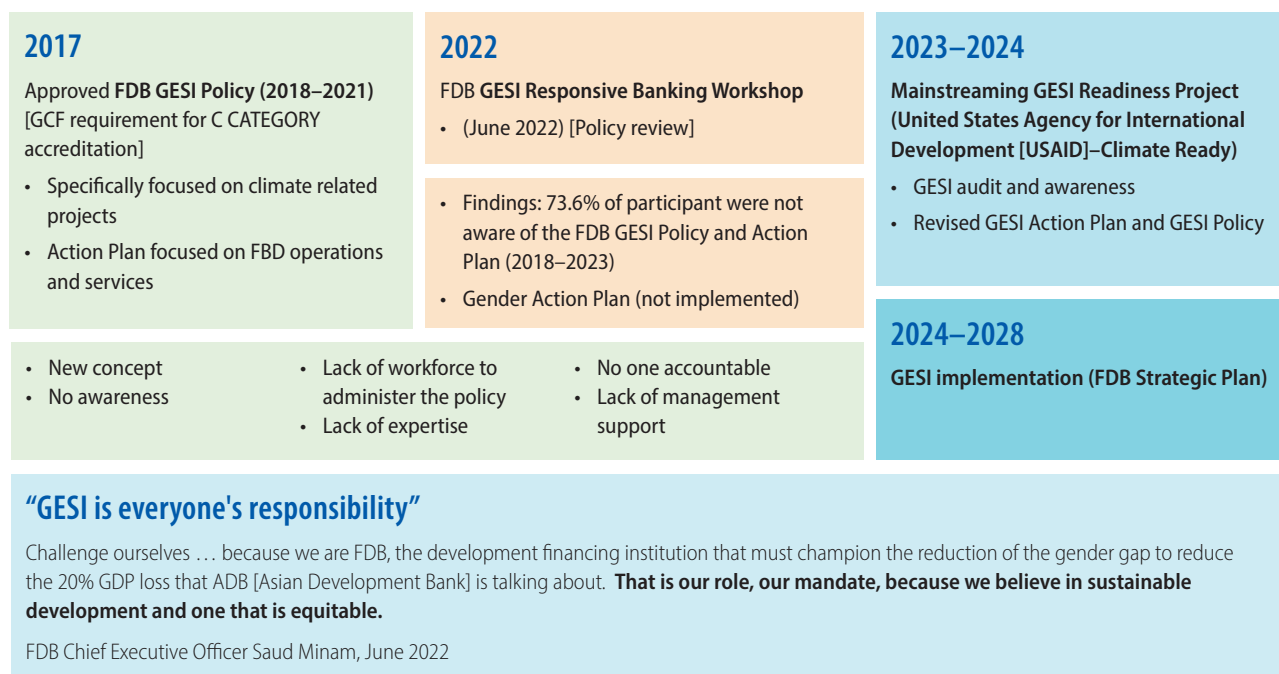
As the global climate funds draft new action plans, Pacific DAEs direct their focus to navigating the current siloed system. In the DB-LX, participants reflected that developing, implementing and monitoring an ESMS and gender policy can seem daunting, but breaking it down into manageable steps by assessing what is already in place and where overall systems can be strengthened to meet

the GCF requirements can be an incredibly useful tool for improvement – not just for the GCF but for various other sources of finance and partnerships. Readiness support can assist with systems-strengthening work that has yet to be actioned because of resource constraints or needs for specialised GESI or ESS technical expertise. For example, the FSMDB gender policy evolved over time. It was developed “not just because of the GCF – [FSMDB was] already looking at this area, [because] when we looked at the categories of the loan products we have, we knew we weren’t reaching everyone”²⁴

On the other hand, FDB received external support to develop a GESI policy in 2018. When the policy was reviewed in 2022, 73.6 percent of participants were not aware of the GESI Policy and Action Plan and many of the actions had not been implemented.²⁵ Figure 3 illustrates FDB’s journey.

FIGURE 3: Fiji Development Bank’s (FDB’s) process and challenges in developing its Gender Equity and Social Inclusion (GESI) Policy

FDB gender equality and social inclusion (GESI) journey



Source: Fiji Development Bank (FDB)

23. IEU (2024). IEU Synthesis on Access in the GCF, p. 28.

24. Norleen Oliver (FSM Development Bank). Presentation at DB-LX (Suva, Fiji) – 14 January 2025.

25. Fiji Development Bank (FDB) presentation at the DB-LX (Suva, Fiji) – January 2025.

Ensuring that leadership supports and champions the changes that are needed is a critical part of creating the ownership and supporting the motivation within the organisation as to why the work is crucial and necessary. There is also the opportunity to use readiness resources – learning exchanges, training workshops, technical support – to advocate for improved coordination so

that requirements to enhance complementarity and reduce duplication are rationalised.

We need people who do the work – who go for workshops and come home to share. We also need to be vocal in talking to our bosses to get things done.²⁶

Lesson 3: Embed the socio-cultural context in project development and delivery

Pacific Island countries – while small in terms of population – are hyper-connected socially and culturally. Leveraging this strength is key to effective project design and implementation. The importance of cultural ties across the region was highlighted by Sulie Vunibaka, BCI Assistant Relationship Manager for Corporate and Business Finance, who has been with the bank for 10 years. Sulie, originally from Fiji, described the benefits of being able to easily reach out to former colleagues at FDB to learn from their experience in the accreditation process, which ultimately helped facilitate BCI's approach and informed its decision to apply for ESS Risk Category B accreditation.

A deep understanding of the socio-cultural context is also critical to meaningful engagement with communities in GCF processes. An intentional, tailor-made strategy for establishing effective communication channels between partners and the beneficiary communities was recognised as crucial. This requires time and resources, particularly in countries that are geographically dispersed. The DB-LX reflected that meaningful engagement requires speaking in common ways and terms – but is ultimately beneficial not just in the pursuit of equity but also efficiency.

[It is essential] to facilitate consultations in the local language at a time convenient for the community, to ensure that women, young people, persons with disabilities and senior citizens can provide meaningful context-specific feedback.²⁷

The geographic realities of dispersed islands and the presence of multiple languages and/or dialects requires investment in the right facilitators and an intentional and well-planned approach. DB-LX participants shared various examples illustrating the efficiency of time and resources spent upfront in engaging meaningfully with communities. Meaningful engagement means taking more time, translating processes for customer feedback into local languages, and simplifying messages.

Effective stakeholder engagement means going into the community and talking to them, using their language. People may be reluctant to propose suggestions, raise issues or grievances and are more comfortable talking to someone in their own language.²⁸

Participants reported that, operationally, viewing a project proposal and design through a socio-cultural lens is critical to effectively implementing GESI and ESS frameworks. Cultural contexts and protocols must guide the stakeholder consultation approach to the accreditation process itself and – importantly – in the way GESI and ESS frameworks are integrated into climate change adaptation projects.



26. Sileas Pousima (Tonga Development Bank). Presentation at DB-LX (Suva, Fiji) – 15 January 2025.

27. Kara Medina (SPC). Presentation at DB-LX (Suva, Fiji) – 14 January 2025.

28. Derek Johnson (Bank of the Cook Islands). Presentation at DB-LX (Suva, Fiji) – 16 January 2025.



TONGA: *In Tonga, land cannot be owned by women. Understanding this and the way that land can be passed on to female relatives is important in developing appropriate GESI policies.²⁹*

FEDERATED STATES OF MICRONESIA: *There are different dynamics in each state [in FSM]. In Yap we have a unique caste system and cultural practices that at times can inadvertently inhibit certain groups of people from accessing resources or benefiting from opportunities. For example, for people from a lower caste, women have to walk on their knees when men are present or they might have to go through their male relatives to access finance. Women cannot take out loans so men take it on their behalf. So even though we want to serve our women, within the current cultural practices men have to be engaged.³⁰*

FIJI: *At the beginning of the Fiji Agrophotovoltaic Project in Ovalau, we had selected one area. During implementation it became obvious that the site was unsuitable as a water pipeline was installed to benefit a neighbouring island. This meant renegotiating land lease arrangements with the community. The land used for the project was freehold, the owners were using the site, and they wanted to be compensated for the loss in agriculture crops on the site. An understanding of the existing land tenure systems is critical for designing appropriate Environmental and Social Safeguards to ensure that*

projects don't exacerbate local level tensions or informal arrangements. Where conditions change an adaptive process is required for managing this.³¹

Socio-cultural context is equally important in designing GRMs. For example, in Fiji it is important to engage with communities directly but also to keep relatives in urban centres informed. For a solar Agrophotovoltaic project (renewable energy for farming),³² Setaita Tamanikaiyaroi shared that during the design phase the project proponent conducted “extensive community awareness, design meetings, consultations, but [community members during implementation] still had queries about the project”.

“Consultations have to be done regularly so that communities are updated all the time. The Turaga ni Koro [village headman] may change during the process and you'll need to bring new leaders up to speed. Community views can also change,” Setaita said. It may also be necessary to deal with more than one set of community members, “those that are at the village, and the urban residents. There are sometimes conflicting comments that arise – it is important to find ways to engage with both – even though there are signed agreements, it doesn't necessarily matter.”

Embedding socio-cultural understanding is essential for ensuring that climate finance initiatives are operationally effective, locally relevant, and ultimately sustainable in the Pacific context.

29. Silesa Pousima (Tonga Development Bank). Presentation at DB-LX (Suva, Fiji) – 15 January 2025.

30. Norleen Oliver (FSM Development Bank). Presentation at DB-LX (Suva, Fiji) – 16 January 2025.

31. Setaita Tamanikaiyaroi (Fiji Development Bank). Presentation at DB-LX (Suva, Fiji) – 16 January 2025.

32. See GCF Approves FDB's Funding Proposal for Fiji AgroPhotovoltaic Project in Ovalau (2020).

Lesson 4: Design for implementation, not (just) approval

Participants shared the importance of including and engaging all specialists early in the process to ensure that ESS and GESI considerations are integrated well throughout the entirety of project development and implementation – technically, ‘mainstreaming’ – so that the (separate) Environmental and Social Management Plan, Gender Action Plan, and Stakeholder Engagement Plan for every project are seamlessly woven together into the main logical framework in regards to sub-activities, indicators and timeline levels.

We can't bring in a GESI specialist late in the design process to just review the design and write the GESI annex and expect GESI to be adequately integrated into the project.³³

You've done GESI/ESS mainstreaming well if it is embedded into your project sub-activities directly.³⁴

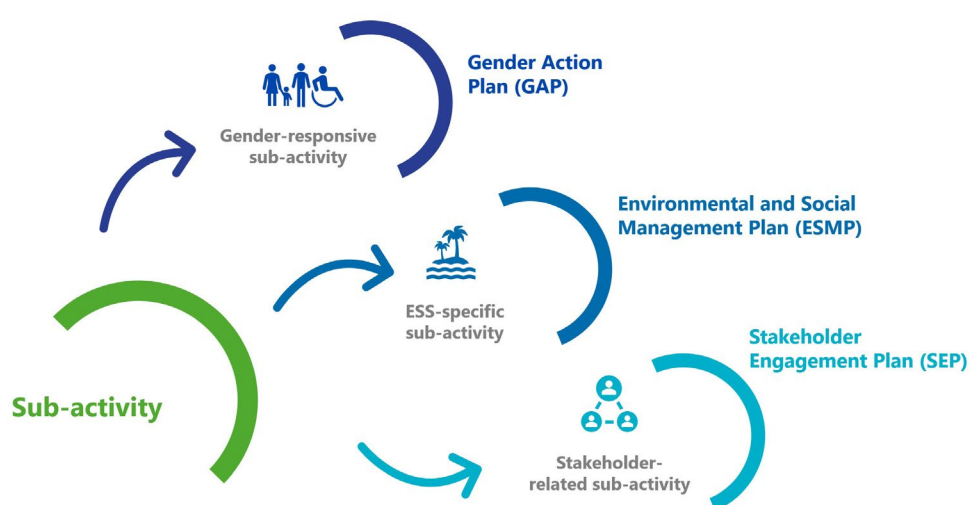
Breaking down silos also means working together to strengthen MEL systems. It is worth spending the time and effort to consolidate all the data collection and reporting requirements in a single system, so that reporting on activity or output level indicators automatically translates to reporting on ESS or GESI indicators. This approach provides project managers and technical specialists with the ‘line of sight’ necessary to implement, monitor and report a gender-responsive, ESS-compliant and stakeholder-inclusive project effectively.

It is important for organisations to design projects based on current implementation capacity and systems, instead of focusing solely on the immediate hurdle of funding approval. It is also important to understand what financing institutions require in different sections and annexes of a project proposal, and critical to avoid setting up for failure by making promises only to tick a box.

We all know of projects that are late, that have been delayed or even had funding that has been returned. There is often a focus on doing the design to get the project approved ... But when implementation starts, if you can't do the things you said you would you'll get into trouble. It is easy to get it to look good on paper – we know that.³⁵

This applies to ESS and GESI components. It may be tempting to include a lengthy suite of project or activity indicators that demonstrate various aspects of monitoring environmental and social risk, or measuring gender-related impacts, but these indicators need to be realistic and within the capacity of the organisation to measure. Streamlining monitoring and reporting requirements across all of these areas is an efficient way of integrating ESS and GESI requirements into existing MEL and broader organisational systems. The **woven logframe** approach was introduced to participants through a practical exercise in the DB-LX. Figure 4 illustrates the approach.

FIGURE 4: Weaving the logframe: Harmonisation of Gender Action Plans (GAPs), Environmental and Social Management Plans (ESMPs) and Stakeholder Engagement Plans (SEPs) on sub-activity levels



Source: SPC

33. Group activity reflections at DB-LX (Suva, Fiji) – 16 January 2025.

34. Ibid.

35. Dirk Snyman (SPC). Presentation at DB-LX (Suva, Fiji) – 14 January 2025.

When it comes down to granularity – ideas sound simple but they aren't. It comes back to how ... we figure out ideas, the technical components, [whether there are] indicators that need to be linked to the work and reporting

... So we review the work and see how we reflect this and operationalise it. As such, we need to understand the different aspects ... Teamwork and ownership are important.³⁶

Lesson 5: Strengthen climate finance partners' understanding of Pacific realities

The GCF recognises the importance of locally-led action and the role of communities, civil society, the private sector and indigenous people's organisations.³⁷ Whilst the GCF accreditation and proposal process can seem onerous, supporting countries through direct financing is arguably a prerequisite for claiming to be locally-led. According to the GCF IEU access study, direct financing is also a response to the issue that "international agencies ... have been criticized by local actors for their dominant role in negotiations and planning, often tailored to suit their business model rather than local needs."³⁸

Building the relationships with the GCF and other climate finance providers to understand the region is an important investment in developing contextualised, locally-led solutions.

We built the relationship over the years between government and GCF officials. Personal connections can open doors. Going to meetings is important for networking. We really wanted them to visit the outer islands so they could see the reality on the ground. It also really helped in clarifying things we didn't understand and to hear their explanations of the way they perceived things.³⁹

Climate finance institutions and partners may need to be further equipped with a stronger understanding of the Pacific reality. As an example, engaging the 'private sector' offers a unique operational definition given the private sector in the Pacific includes many small landholders, and land tenure differs across Pacific countries and affects

THE MOST AFFECTED TEND TO BE THE LEAST RESPONSIBLE...



access to finance. Loan products are designed to take this context into account, though the rationale for certain features of a product may not be immediately obvious and may require explanation. For instance, a participant at the DB-LX commented that "due to the large informal sector, MSMEs [micro, small and medium enterprises], extended family businesses – our communities include the private sector" and these current structures might not be immediately obvious when describing 'climate finance access' for Pacific communities.

In the DB-LX, further contextualisation was documented in the mapping exercise of the identified strengths, needs and priorities of Pacific Development Banks in GESI, ESS and MEL. As shown in Figure 5, the exercise found clear areas of convergence, surfacing both shared challenges and complementary capacities.

36. Elenoa Seniloli (Fiji Development Bank). Presentation at DB-LX (Suva, Fiji) – 16 January 2025.

37. IEU (2024). IEU Synthesis on Access in the GCF.

38. Ibid.

39. Teruautu Ringi (Bank of the Cook Islands). Presentation at DB-LX (Suva, Fiji) – 14 January 2025.

FIGURE 5: Development Banks Learning Exchange (DB-LX) mapping exercise in Gender Equity and Social Inclusion (GESI), Environmental and Social Safeguards (ESS), and Monitoring, Evaluation and Learning (MEL): Strengths, priorities, opportunities

Development banks (DB)	Strengths and experience	Challenges and priorities	Opportunities for engagement
Federated States of Micronesia Development Bank (FSMDB)	<ul style="list-style-type: none"> • Gender policy adapted for multi-state realities and anchored on common FSM values (<i>"Consultation is a must"</i>) • Sophisticated socio-cultural awareness (<i>"Different dynamics in society; status of women"</i>) • Established Performance Measurement Framework (PMF) for gender monitoring (<i>"Mechanism to monitor gender strategy"</i>) 	<ul style="list-style-type: none"> • Geographic and socio-cultural diversity (<i>"Geographical spread of FSM states: different culture, language, priorities"</i>) • Localisation complexity (<i>"Localising the 'international' views of gender into FSM context"</i>) • Variation in state-level gender and social norms 	Can share technical peer advice on localising gender equity and social inclusion (GESI) frameworks across complex socio-cultural settings for BCI, DBS, TDB, FDB
Fiji Development Bank (FDB)	<ul style="list-style-type: none"> • Environmental and Social Safeguards (ESS) mainstreamed into projects and lending operations (<i>"Mainstreaming ESS into FDB normal lending"</i>) • Monitoring, Evaluation and Learning (MEL) system integration and officer in place • Stakeholder engagement experience (<i>"Awareness of key stakeholders on GCF standards & processes"</i>) 	<ul style="list-style-type: none"> • Implementation of a 'new' gender policy (<i>"Low awareness internally; lack of technical staff and expertise"</i>) • Re-initiating ESS processes and indigenous stakeholder engagement when project sites change • Managing community expectations through Grievance Redress Mechanisms (GRMs) 	Can offer experience-based advice on MEL system design and ESS mainstreaming for BCI, DBS, FSMDB
Bank of the Cook Islands (BCI)	<ul style="list-style-type: none"> • Appropriate core banking system to support new initiatives • Capacity building for current staff and engagement of external expertise • Cross-government agency support 	<ul style="list-style-type: none"> • Aligning DB, GCF and government systems to meet multiple requirements • Developing new policies and enhancing reports on technical components • Absorptive capacity constraints 	Can share accreditation lessons on delivery partner engagement and early system alignment with DBS, TDB
Tonga Development Bank (TDB)	<ul style="list-style-type: none"> • Deep knowledge of land tenure and gender dynamics • Local empowerment focus (<i>"Community and private sector empowerment"</i>) • Internal foundations (<i>"Existing drafts of MEL policy"</i>) 	<ul style="list-style-type: none"> • Accreditation progress (<i>"Engaging a delivery partner for GCF (mini-)accreditation"</i>) • Completion and mainstreaming of technical component policies • Gaps in education and/or technical capacity and funding 	Can offer contextual insights on customary governance integration into GESI and ESS frameworks for FSMDB, BCI, DBS
Development Bank of Samoa (DBS)	<ul style="list-style-type: none"> • Accreditation pipeline building aligned to national strategies • Dedicated new division to research and development, policy and business advisory • Continued enhancement of institutional capacity 	<ul style="list-style-type: none"> • Systems under development • Constraints in technical expertise, dedicated resourcing for project development • Readiness resource optimisation (<i>"Need to add value and utilise readiness resources efficiently"</i>) 	Can share early-stage accreditation reflections and experiences with BCI, TDB

Source: SPC; DB-LX 2025

Socio-cultural adaptation was a common priority: FSMDB emphasised that *consultation is a must* across its multi-state jurisdictions; DBS and TDB pointed to local tenure and governance norms influencing women's access to finance; while FDB and BCI underscored the operational need to embed inclusive stakeholder engagement directly into project processes. Across institutions, strengthening internal systems rather than replicating donor structures was consistently prioritised. FDB's efforts to mainstream ESS into lending aligned with BCI's need to *bridge capacity gaps* for climate investment coordination, while FSMDB's phased approach to gender policy adaptation offered a model for others still developing GESI systems. Common bottlenecks included limited technical staff, MEL formalisation, and absorptive capacity constraints.

The mapping exercise also highlighted practical opportunities for peer support. FSMDB's gender policy experience offers direct lessons for banks initiating GESI integration, while FDB's MEL system provides a working model for others formalising monitoring frameworks.

These distributed capacities demonstrate that much of the technical expertise needed to strengthen climate finance access already exists within the region itself. Sustained partner engagement remains essential, but solutions grounded in Pacific knowledge are well-positioned to lead continued capacity strengthening.

*We also need to understand that we also need to teach and learn from each other. Do not undervalue your own expertise and we all can learn a lot from each other.*⁴⁰

Knowledge and expertise that already exist in the region can be strengthened to play a greater role in operationalising context-specific ESS, GESI and stakeholder engagement in accreditation, project design, implementation and MEL. Enabling climate finance institutions to fully understand and respond to the Pacific context – through the outcomes of modalities such as the DB-LX and tools such as this lessons learnt paper – is a strategic necessity to ensure that climate finance actions are truly locally-led, fit-for-purpose and effective.



40. Dirk Snyman (SPC). Presentation at DB-LX (Suva, Fiji) – 14 January 2025.

Recommendations

The following recommendations emerged from the discussions and peer-to-peer exchanges.

Support Pacific-led development by educating external partners of our context and using Pacific expertise.

The DB-LX stressed the importance of educating climate finance institutions about the realities of the Pacific context. This includes using local expertise to support Pacific-led development. The various requirements relating to ESS, GEDSI and MEL systems are often fulfilled through the contracting of external specialists who are not necessarily familiar with the context. There is a need to grow the number of Pacific experts with the experience and technical know-how to provide support to national and regional DAEs to develop strong, culturally relevant and context specific ESS, GEDSI and MEL systems. Additionally, there is a need to support external entities and personnel within funding institutions to understand the cultural and professional environment of Pacific Island countries.

For financing institutions and development partners

Prioritise the use of Pacific specialists and develop systems to grow the pool of specialists capable of meeting GCF and other financing agency requirements.

For national and regional direct access entities

Engage with financing institutions to nurture relationships and educate them about the realities of the region.

Consolidate Pacific-centred ESS, GESI and MEL knowledge to ensure projects build on existing resources and minimise duplication.

For small administrations, GCF requirements add another layer of ‘capacity gaps’ that stretched civil servants must address. Supporting National Designated Authorities (NDAs) and DAEs to streamline requirements by collating existing knowledge and information contained in ESS documents and GEDSI analyses can reduce duplication of time, effort and resources. These processes currently occur separately, and are often contracted out to external consultants without the ability nor opportunity to build on what has been developed previously.

For government ministries and NDAs

Ensure that previous knowledge is consolidated particularly as it relates to GEDSI and ESS by country so that each project-specific assessment builds on work that has already been done and tools that have already been tested.

Invest time in nurturing interpersonal relationships and trust those that understand the socio-cultural context.

The interpersonal aspect of working in the Pacific context was the subject of extensive discussions during the DB-LX – particularly the need to nurture the relationships that sit behind the paperwork. Relationships are everything in the Pacific. Relationships between multilateral financing institutions and small administrations or bank staff take time to develop. Trust takes time to build. Investing in these relationships means getting to know the people behind the paperwork and trusting those with a deep understanding of the socio-cultural context to know what works in their context. Using and supporting the growth of expertise from the region can improve the effectiveness of ESS, GESI and MEL systems. External experts should only be used as a last resort.

For national and regional direct access entities

Ensure that the opportunities for strengthening relationships and using Pacific expertise are integrated within each proposal. Integrate mentoring opportunities for emerging specialists where possible.

For government partners and the GCF

Support information and learning sessions for DAEs and ESS, GESI and MEL specialists (often consultants) from the region to understand the expectations for specific funding institutions and share learning.

Encourage designing for implementation and ongoing learning by adopting a ‘woven logframe’ approach to project MEL.

Adapting the format of the project proposal’s compulsory annexes and project MEL systems to an organisation’s existing systems could produce more integrated approaches. This would better support information sharing and also reduce the challenge of mainstreaming. Currently a separate Environmental and Social Impact Assessment and Framework/System/Management Plan, Gender Assessment and Action Plan, Stakeholder Engagement Plan, and MEL Plan promote the siloed expertise relating to proposal development, implementation and MEL. Using SPC’s woven logframe approach can support streamlined reporting. These approaches can promote integration but can also reduce the burden on stretched personnel in small island nations.

For external financing institutions including the GCF

Review the proposal’s compulsory annexes to ensure that opportunities for mainstreaming ESS and GESI are being taken and that reporting on MEL systems is streamlined.

For national and regional direct access entities

Examine how an integrated approach can be used to streamline design, monitoring and reporting across projects, for instance, using the woven logframe approach and tools (see Annex 1).

Strengthen peer-to-peer learning among accredited entities and those on their accreditation journey.

Participants found value in peer-to-peer learning approaches, which is indicative of the importance placed on interpersonal relationships in the Pacific – including in a professional context. Building on these relationships as a foundation is a convenient – yet important – part of improving Pacific Development Banks’ ability to promote learning across the region and to incorporate this learning as part of project delivery and MEL.

For regional entities

Maintain a database of in-country and Pacific specialists involved in climate finance work.

Enhance peer-to-peer learning opportunities across Development Banks and DAEs.

Map out where different areas of expertise on different topics are across the region. Bring in NDAs to also support this process and listen to reflections from DAEs.



Annexes

Annex 1: The ‘woven logframe’ approach and tools

The integrated logical framework or **woven logframe** is a project design approach that integrates GESI, ESS, stakeholder engagement and MEL frameworks directly into the main project logframe.

Instead of developing annex plans as separate or parallel documents, it aligns these elements at the sub-activity and indicator level from the outset, ensuring that environmental safeguards, gender actions and stakeholder commitments are built into core project activities, as shown in the following SPC Figure. This creates a single, coherent structure that supports clearer implementation pathways, reduces duplication and strengthens accountability. It is also applied iteratively, allowing project teams to revisit and refine these linkages during implementation as project realities evolve.

For Development Banks and National Implementing Entities preparing funding proposals, this offers a practical tool to structure project designs that are both compliant with climate finance donor requirements and operationally deliverable. By directly linking annex content – such as the Gender Action Plan, Environmental and Social Management Plan, and Stakeholder Engagement Plan – to project activities and indicators, the approach helps teams embed key commitments into delivery mechanisms from the start. It also enables institutions to contextualise international policy standards into national systems while clarifying monitoring responsibilities.

For more on the woven logframe and the latest version of tools, email climatefinanceunit@spc.int.

‘Weaving’ the logframe: Gender & ESS plans as not separate

Designing with Monitoring, Evaluation, and Learning (MEL) in mind

PROJECT ACTIVITY	SUB-ACTIVITY	GAP, ESMP and SEP ALIGNMENT			Assorted Columns: Output, Responsibility, Timeline, Budget	Progress for this Reporting Period	Planned Activities in the Next Reporting Period
		Gender-Responsive Sub-Activity	ESS-Specific Sub-Activity	Stakeholder-Related Sub-Activity			
OUTCOME 1.							
Output 1.1.							
1.1.1. xxx	1.1.1.1.	G.1.1.1.1.					
			ES.1.2.1.1.				
				SE.1.1.1.1.			
1.1.2.	1.1.2.1.						
	1.1.2.2.						
1.1.3.	1.1.3.1.						
	1.1.3.2.						
	1.1.3.3.						

Annex 2: Profiles of the participating Pacific Development Banks



Bank of the Cook Islands (BCI)

BCI is the Cook Islands' only locally-owned and operated bank, and is a state-owned enterprise. The bank was accredited to the Green Climate Fund (GCF) as a Direct Access Entity (DAE) in 2024. See: <https://bci.co.ck/>



Fiji Development Bank (FDB)

FDB was established under the Fiji Development Bank Act 1966 on 1 July 1967 and is an autonomous statutory body. The bank was accredited to the GCF as a DAE in 2017. It has one approved project and is actively working on others. See: <https://www.fdb.com.fj/>



Federated States of Micronesia Development Bank (FSMDB)

FSMDB is a subcomponent unit of the national Government of the Federated States of Micronesia (FSM). Shareholders are the national government, Chuuk State Government and Kosrae State Government. It started lending in 1982. The bank was accredited to the GCF as a DAE in 2023. See: <https://www.fsmdb.fm/>



Development Bank of Samoa (DBS)

DBS was established in 1974, starting with an agricultural focus, and since diversifying its mandate to cover all development sectors. As of July 2025, the bank was seeking accreditation to the GCF. See: <https://dbsamoa.ws/>



Tonga Development Bank (TDB)

TDB is mandated to promote economic development through the provision of finance and advisory services, and focuses on agriculture, fisheries, tourism and small-and medium-sized enterprises (SMEs). As of July 2025, the bank was seeking accreditation to the GCF. See: <https://tdb.to/>

Annex 3: The Pacific Community's (SPC's) role in enhancing access to climate finance for, in and with the Pacific

SPC has been a delivery partner for Green Climate Fund (GCF) Readiness Grants since 2016, and since 2019 has been accredited by GCF as a Regional Direct Access Entity (DAE).

As a DAE, SPC can support: readiness grants, micro- and small-sized projects (up to USD 50 million); project management and grant funding; and Category C and B environmental and social risks.

Operationally, this level of accreditation means SPC is authorised to:

- submit readiness applications and be the delivery partner for associated grants;
- develop/submit concept notes and funding proposals to GCF;
- access technical assistance from GCF on concept note development;
- access the Project Preparation Facility; and
- implement projects approved by GCF.

SPC has been a regional implementing entity for the Adaptation Fund (AF) since 2021, and is accredited to support small- and regular-sized projects and programmes (up to USD 10 million for single-country initiatives and USD 20 million for regional initiatives). It can also support project management and grant funding.

Operationally, this enables SPC to:

- develop/submit concept notes and funding proposals to AF;
- access Project Formulation Grants; and
- implement projects approved by AF.

More generally, SPC is a regional resource for providing assistance. It works with governments and institutions across the Pacific region, including with agencies that are National Designated Authorities (NDAs) for GCF, to address national climate change priorities.

SPC's support under the auspices of the GCF and AF is delivered by its Climate Finance Unit (CFU), within SPC's Climate Change and Environmental Sustainability (CCES) division.

Examples of CFU's achievements in this regard include (but are not limited to) its implementation of:

- NDA strengthening and country programming support (Phases I, II and III) for the Federated States of Micronesia (FSM) in the form of readiness grants.
- Strengthening the adaptive capacity of coastal communities to climate change through nature-based seawalls in Fiji in the form of an adaptation grant.
- Building capacity of regional DAEs and NDAs to foster climate action in the Pacific in the form of a readiness grant.
- Enhancing adaptation and community resilience by improving water security in Vanuatu via an adaptation grant.

Within SPC's CCES division is its Climate Change Flagship (CCF). CCF is designed to *strengthen internal, regional and global processes and partnerships and provide a clear investment platform for collective action that accelerates the climate ambitions of SPC's member Pacific Island countries and territories*. It seeks to draw together the range of knowledge and expertise from across SPC – including the work of CFU – in order to achieve the following “with and for SPC members” by 2031:

- adaptation and resilience
- mitigation and just transition
- loss and damage and climate security
- effective access and use of climate finance.

For more information on the Climate Change Flagship, see: <https://climatechangeflagship.spc.int/>

For more information on the Climate Finance Unit, see: <https://spc.int/CCES/CFU>

Annex 4: Glossary

Direct Access Entities (DAEs)

Sub-national, national or regional organisations that need to be nominated by developing country National Designated Authorities (NDAs) or focal points. Organisations nominated to become DAEs may be eligible to receive GCF readiness support. This funding is designed to help organisations in developing countries prepare to become Accredited Entities, as well as helping those that have already been accredited, to strengthen their organisational capacities.

See: <https://www.greenclimate.fund/accreditation>

Environmental and Social Safeguards (ESS) Risk Category

The environmental and social risk categories of activities supported by GCF are defined as follows:

- Category A. Activities with potential significant adverse environmental and/or social risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented.
- Category B. Activities with potential limited adverse environmental and/or social risks and impacts that, individually or cumulatively, are few, generally site-specific, largely reversible, and readily addressed through mitigation measures.
- Category C. Activities with minimal or no adverse environmental and/or social risks and/or impacts.

See: [Sustainability guidance note: screening and categorizing GCF-financed activities](#) (2019).

National Designated Authorities (NDAs)

Government institutions that serve as the interface between each country and the Green Climate Fund (GCF). They provide broad strategic oversight of the GCF's activities in the country and communicate the country's priorities for financing low-emission and climate-resilient development.

See: <https://www.greenclimate.fund/about/partners/nda>

Talanoa

The *talanoa*, according to Vaoleti, refers to “a personal encounter where people story their issues, their realities and aspirations”⁴¹ that “allows more *mo'oni* (pure, real, authentic) information to be available for Pacific research than data derived from other research methods”.⁴² Talanoa [...] offers “a cultural synthesis of the information, stories, emotions and theorising...will produce relevant knowledge and possibilities for addressing Pacific issues”.⁴³ It was for these very reasons that the *talanoa* was selected as the dialogic tool to gather information from stakeholders.

See: [Pacific Monitoring, Evaluation and Learning Capacity Strengthening *Rebbilib*](#) (2020).

Va'a

Va'a (or *waka*, or *wa'a*) are traditional canoes in the Pacific, used to journey across the vast ocean from one destination to another.

See: [Pacific Monitoring, Evaluation and Learning Capacity Strengthening *Rebbilib*](#) (2020).

41. Vaoleti, T. M. (2006) Talanoa research methodology; a developing position on Pacific research. *Waikato Journal of Education* 12:2006. <https://researchcommons.waikato.ac.nz/server/api/core/bitstreams/4d7849c6-d17c-44f7-8380-dc0b7e330028/content>

42. *ibid*

43. *ibid*

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