

NAMA lessons for NDCs:

Financing, public participation, and sustainable development

December 2016



Introduction

Nationally Appropriate Mitigation Actions (NAMAs) have proven to be a good exercise that paved the way to national level mitigation and a move from project to sectoral based mitigation. Their evolution has developed one of the most valuable tools that developing countries have to pursue their national commitments towards limiting global warming to 2C in line with the Paris Agreement.

Since adoption of the Agreement, there is a question of how NAMAs fit in the future climate landscape. Certainly there is a prospect for them to continue beyond 2020 and at minimum provide valuable lessons and implementation tools for countries' Nationally Determined Contributions (NDCs).

NDCs face similar development and implementation challenges as NAMAs; learning is therefore crucial. This policy brief charts a path for how NAMAs can inform the NDCs.

The briefing outlines the current trends in NAMA development and implementation, deliberates on the future role of NAMAs and a prospect for them to continue beyond 2020 in the context of INDCs. Furthermore, the briefing defines how NDCs benefit from countries' experiences with NAMA development and implementation.

Key findings and recommendations

For NDCs to drive transformational change, supporting and implementing actors should:

- Build on the limitation of NAMAs by providing a system for sustainable development assessment, including publicly available sustainable development indicators, and requirements for sustainable development monitoring, and stakeholder engagement;
- Provide clear rules for defining the minimum group of stakeholders to be invited, means for inviting stakeholders' participation, information to be made available in the appropriate language, as well as how the consultations shall be conducted;
- Address financial risks and returns, public resources and leveraging of investments through establishment of rigorous financial mechanism.

1. Trends in NAMA development

NAMAs are a vehicle for developing countries to pursue national sustainable development and mitigation objectives. They can be implemented in a form of projects, policies, sectoral goals, or other nationally appropriate forms.

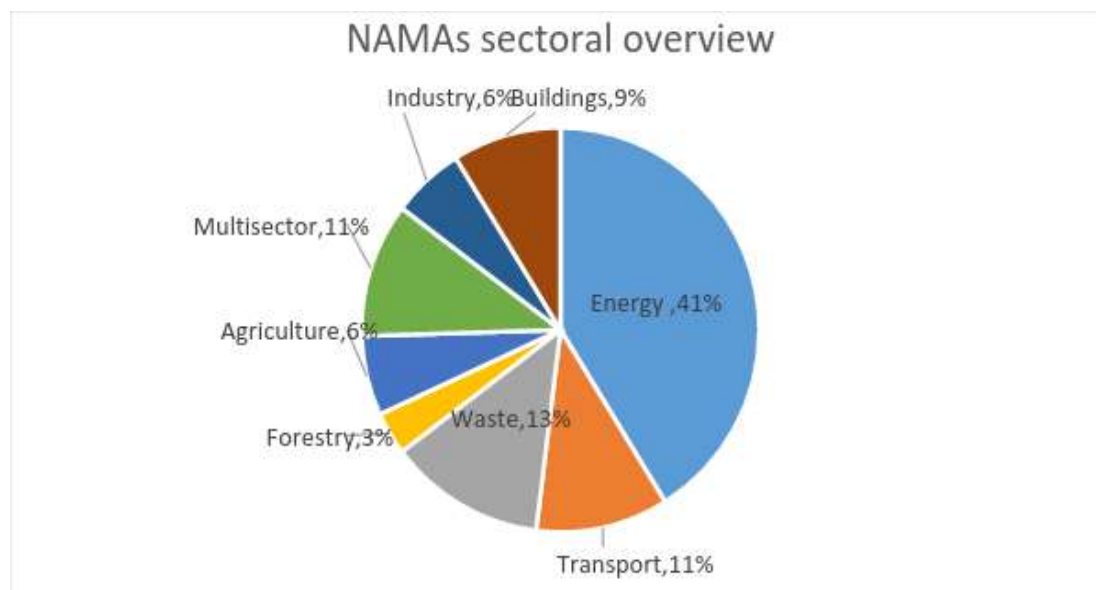
Intended as a tool to shift developing countries to a low emission trajectory and to drive transformational change, they were established as part of the Bali Action Plan in 2007. Since then, 220 NAMAs and 34 feasibility studies have been launched and are currently in development or implementation in 64 countries.¹ Development of NAMAs has been rising slowly but steadily.

NAMA implementation has however encountered obstacles with a huge discrepancy between developed and implemented NAMAs, largely related to a lack of financing and a lack of clarity regarding how NAMAs relate to the implementation of NDCs under the Paris Agreement. Less than 10% of all NAMAs - 19 out of 204 - have found financial and technical support for implementation. Since the Paris Agreement's adoption, only three NAMAs received funding for implementation.

In the meantime, almost all developing countries developed intended actions for meeting more ambitious national climate targets - the so called Intended Nationally Determined Contributions (INDCs) as the basis for the Paris Agreement, which in many ways can help propel and complement NAMA implementation (See section 2).

Sectoral and regional overview of NAMA development

NAMAs are mostly developed as sector specific policies and programmes with long term objectives. Most (41%) are developed in renewable energy and energy efficiency, which account for close to half of all NAMA activities under development. This is followed by the waste, transport and building sectors. NAMAs addressed mitigation potential in sectors that were not widely exploited or viable under the Clean Development Mechanism (CDM), such as transport and land use activities.



Source: Ecofys, NAMA Database, 2016

Currently Latin America is a NAMA development leader with 37% of all NAMAs developed, followed by Africa (31%) and the Middle East and Asia (25%). Some European countries, specifically Serbia and Bosnia and Herzegovina have also developed NAMAs, but none have been implemented yet. NAMA implementation is almost equally distributed between Latin America, Africa and Asia. In comparison, more than 80% of CDM projects take place in Asia and Pacific.²

NAMAs and the CDM: Similarities and Differences

In many ways NAMAs are associated with the CDM, a so-called flexible mechanism of the Kyoto Protocol. Both instruments aim to reduce emissions and contribute to sustainable development in developing world. However, NAMAs are distinct in many ways.

Unlike the CDM, NAMAs have the fundamental objective of addressing national or local needs for social, economic and environmental development. In principle, reducing emissions is part of a holistic approach to sustainable development in the developing country. On the contrary, GHG emission reductions are the only condition for receiving carbon credits under the CDM, while sustainable development benefits are often an afterthought or not comparably assessed.

NAMAs are financed from national and international sources and are generally not conceived of as a market mechanism that generates credits through implementation of projects. Parties have discussed the idea of 'credited NAMAs', but the concept has not yet evolved under the UNFCCC. Moving away from offsetting and project-based focus makes NAMAs better suited to drive long-term national strategies.

The scope of NAMAs moves beyond the project level to sectoral mitigation. NAMAs can be defined in any nationally appropriate way. They can be undertaken in the form of policies, programs or projects. For example, NAMAs can introduce a new set of standards (e.g. energy efficiency standard in housing), laws and regulations and financial incentives (e.g. energy tax).

Parallel developments

In addition to NAMAs, there are a number of other long-term country driven processes for GHG mitigation and sustainable development. NAMAs have a strong relationship to some of them or can inform development of others, such as:

Low-Emission Development Strategies (LEDS)

In general, NAMAs do not start from scratch but are born from a long-term process that can be based on existing policies and strategies. An example of this are Low-Emission Development Strategies (LEDS), which are used by Parties as strategies to reduce emissions and contribute to sustainable development across all sectors. There are several different synonyms used for instruments such as LEDS that countries implement (e.g. Low Carbon Development Strategy, National Climate Change Plan).

The mechanism to contribute to mitigation and support sustainable development in the Paris Agreement

Article 6 of the newly agreed Paris Agreement³ established a new mechanism built on the legacy of the CDM. This new mechanism is to 'contribute to the mitigation of greenhouse gas emissions and support sustainable development'. It will replace the CDM, and can be used on a voluntary basis by all Parties to meet their nationally determined contributions (NDCs).

The mechanism, unofficially referred to as the 'Sustainable Development Mechanism (SDM)', will still need to be fully moulded in future negotiations. For now it is still unclear how it will operate, assess sustainable development outcomes or deliver mitigation.



2. Hopes for NAMAs

NAMAs were formally created as actions to achieve a reduction in GHG emissions in comparison to 'business as usual' emissions in 2020.⁴ However, their potential to contribute to implementation of countries' NDCs makes them relevant for the post-2020 climate landscape in discussion.

While NAMAs are not formally mentioned anywhere in the Paris agreement, they should be understood as 'domestic mitigation measures' with the aim of achieving the objectives of NDCs' referred to in the agreement (Art 4, para. 2). The means for the implementation of the agreement will be decided upon in the following years, where NAMAs might find a more precise reference or continue to be presumed as one of the mitigation measures for meeting more ambitious national climate targets.

Given that the implementation of NAMAs in their current context is slow, countries' mitigation commitments through NDCs might provide a new impetus for NAMA implementation in the future.

A look forward: Countries' Nationally Determined Contributions

In the run up to Paris, Parties to the UNFCCC submitted post-2020 objectives and commitments for achieving their climate objectives to form the basis of action under the Agreement. The INDCs are used for countries to indicate how they plan to reduce their greenhouse gas emissions beyond their current efforts and contribute towards achieving the objective of keeping the global temperature increase below 2°C. However, they are not legally bound to implement them or achieve the goals. 190 countries submitted Intended Nationally Determined Contributions (INDCs), which represent more than 98 % of global GHG emissions.⁵ As countries ratify the Paris agreement, INDCs are transformed into Nationally Determined Contributions (NDCs). Parties need to communicate new, ambitious NDCs every five years.

Many lines can be drawn between the concept of NDCs and NAMAs. Both are to be designed in the light of national circumstances and development priorities. The commitments under NDCs are diverse, taking a form of economy wide targets, energy targets, policies and projects.

How can NAMAs inform NDC implementation

Providing lessons for defining INDCs

In many countries, NAMAs served as a starting point to structure their INDCs. Capacities and institutions built in countries for developing NAMAs, including monitoring, reporting and verification (MRV) systems, finance channels, identified baselines and barriers, helped start the process of developing their INDC. For example, Thailand's INDC was prepared on the basis of key lessons learned from Thailand's NAMAs.⁶

Implementation tool for meeting NDCs' commitments

Secondly, NAMAs can be used as a tool to implement the mitigation component of NDCs. NAMAs comprise concrete mitigation actions and can serve as a main channel for delivering emission reductions pledged through INDCs. In fact, out of 64 countries active in NAMA development, 46 have included explicit references to NAMAs as part of their NDCs.⁷

Learning from missteps

NDCs ultimately face similar challenges as NAMAs and the CDM, which have demonstrated how the absence of proper guidance and criteria can undermine the objectives of the mitigation action, have serious negative impacts on local communities and the environment. These include financing, all-inclusive stakeholder engagement, and oversight of sustainable development benefits. Actors in NDC implementation process can learn from these lessons.

3. Financing NDCs: lessons from NAMAs

Raising international financing for NAMAs has been a particular challenge. Most NAMAs officially 'under implementation' stage, have managed to leverage only a part of finance, but not enough to carry out complete actions.⁸

In their implementation, NDCs will have to face similar challenges and go through the same financing institutions, therefore it is critical to learn from the experiences of NAMAs in order to facilitate NDCs' access to climate finance.

Challenges in leveraging finance

Most NAMAs in development struggle to attract finance for their implementation. The Paris agreement recognized the need for adequate and predictable financial resources and encourages scaling up of climate finance from different sources. The availability of international climate finance has not changed drastically since Parties adopted the Agreement.

The availability of public climate finance is however not the only obstacle. A significant amount of international climate finance is expected to come from the private sector. But in order for NAMAs to attract private finance, they need to be 'bankable'. That means that they must be able to generate revenues with a sufficient level of certainty, and address policy and institutional changes.

The standing problem is that many NAMA developers pursue a project oriented approach and do not sufficiently address the components of NAMAs to attract private investment. That includes establishing a well-defined financing mechanism, which pins down financial sources and strategies to leverage additional finance, defining developing country's contribution, and clear long-term policy trajectory.⁹

Furthermore, there is often a discrepancy between developing countries' needs for long-term sustainable low-carbon development and investors' request for short term bankability of NAMAs. This indicates the need for a better collaboration between stakeholders in NAMA development process in order to better align the needs of developing countries with donors' requirements.

Sources of finance

There is a number of sources available for development and implementation of NAMAs. These range from domestic to international financial support and from public to private finance.

Support differs according to the type of NAMA. The UNFCCC distinguishes between domestic and supported NAMAs. While domestic NAMAs will rely solely on national support to implement mitigation actions, supported NAMAs seek international support in the form of financing, technology transfer or capacity building.

In both cases the initial bulk of finance will come from developing country's government, which is the principal initiator of NAMA development, and supports most low-emission activities in the country. Public budget is used to leverage additional private sector finance, without which NAMA implementation will be hard to carry out. Ideally, public finance should cover risk mitigation that private sector cannot take on.

In addition, support from international donors is needed. Multilateral, bilateral, development banks and supra-national bilateral funding agencies can play an important role in incentivizing private sector investments. They assist NAMAs by covering the risks and helping overcome technical, regulatory and financial barriers.¹⁰

So far the majority of finance has been provided by United Kingdom, Germany, Denmark and European Commission-funded NAMA Facility. A variety of other financial sources are available for NAMA support at all stages. These include:

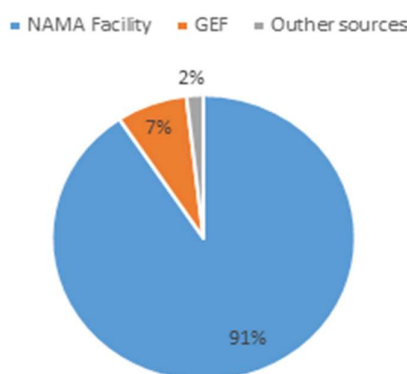
- Public initiatives: NAMA Facility , Germany through International Climate Initiative (IKI) and Climate-related Official development assistance (ODA) funding, Spain through Spanish NAMA Platform, Japan through ODA for Climate Change Measures, Australia through UNDP MDG Carbon, Nordic Environment Finance Corporation (NEFCO);
- Multilateral development institutions: World Bank, Asian Development Bank (ADB), Inter-American Development Bank (IDB);
- the Green Climate Fund (GCF);
- Global Environment Facility (GEF);
- European Union and European Commission: EU-Africa Infrastructure Trust Fund; Latin American Investment Facility (LAIF); Neighborhood Investment Facility (NIF).¹¹

State of finance for NAMAs

According to the NAMA Pipeline Analysis and Database by the UNEP Technical University of Denmark (DTU), by December 2016 **more than \$8,8 billion of support was requested for NAMAs**. Despite the increasing number of available climate finance sources only about **\$175 million has been offered** so far. This represents about 2% of total finance needed for development and implementation of NAMAs. Most of this - \$159 million – has been offered by the NAMA Facility.

Overall, only 19 out of 204 NAMAs have found support for implementation. 14 of these have been awarded funding by the NAMA Facility. Other 5 implemented NAMAs have benefited from funding from other sources, including the Global Environment Facility (GEF), United Nations Development Programme (UNDP) and Austrian government.

Graph 1: NAMA Support offered



The role of funders in promoting civil society participation

In the case of NAMAs, there is very little precise international governance, and unlike with the CDM, NAMAs are not bound by uniform requirements on stakeholder participation that can be applied across all NAMA activities.

NDCs will be implemented through many sub-plans and activities, such as NAMAs. Hence, they will face similar challenges in their development and implementation, and same actors will be brought into play.

The experience from September 2016 shows that only about a half of submitted INDCs (53.7%) mentioned involving stakeholders in the development phase, with less than one fifth (17%) referring to inclusion of civil society as one of the stakeholder groups, but failed to refer to indigenous peoples and affected local communities.¹² Furthermore, it is unclear how participation of civil society and populations affected by actions will be provided in the implementation of NDCs.

While criteria on stakeholder participation are generally defined on country level by the host government, with supported NAMAs, as will be the case with implementation of NDCs, the criteria will also be set by international investors, which provide their own environmental and social safeguard system. The funding institutions thus have the ability to endorse the environmental, and social integrity of mitigation actions.

Why civil society participation matters: lessons from NAMAs for NDCs

Engagement of civil society in all stages of NAMA process has been shown to be an added value to the sustainability of NAMAs. It increases accountability, local ownership and public acceptance of NAMA outcomes. Examples of NAMAs developed in Mexico, Georgia and Costa Rica¹³ have demonstrated that:

- Engagement of local civil society in NAMA development can lead to substantial economic, social and environmental benefits for the local population, such as education, training, and creation of jobs, gender empowerment, and empowerment of younger generations.
- Civil society can be a valuable stakeholder in the process, by being the best judge on which activities are the most realistic for the local or national context, identifying barriers to implementation and acting as a critic by providing feedback to the data from the MRV process.
- Public engagement is key to create country ownership and drive for transformational change and thus can have an important impact on the long-term sustainability of a NAMAs.



4. NAMA financing institutions

This section aims to provide insight into the public participation and sustainable development criteria of some of the key donors providing support for NAMAs; the NAMA Facility, GEF and GCF as a promising source of finance in the future.

a) NAMA Facility

The NAMA Facility was jointly established by the German Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB) and the UK's Department of Energy and Climate Change (DECC) as an outcome of the Doha negotiations in 2012. The Facility stepped forward when the GCF was not yet ready to allocate finance to projects. It does not have the capacity to fund NAMAs as such, but additional sources of finance need to be attracted from partner governments, banks and private sector. So far, the NAMA Facility has been the main contributor to NAMA implementation.

It was the first tailor made initiative for providing technical and financial support for NAMA project outlines that are ready for implementation. The Facility seeks to support game-changing proposals that reflect transformational change towards a low-carbon development path. That means that the proposals for the so called NAMA Support Projects (NSP) must indicate how they will contribute to the objectives in comparison to business as usual, and how they will achieve permanent change that can be replicable.

Given the success of the first two calls for projects in 2013 and 2014, two new donors joined the initiative in 2015 - the Danish Ministry of Climate, Energy and Building (MCEB), and Foreign Affairs (MFA) and the European Commission. Since 2013, the NAMA Facility has launched four calls for proposals, resulting in 14 NAMA Support Projects awarded more than €260 million.

Criteria for public participation

Initially, the project outlines had to fulfil feasibility criteria including whether key stakeholders have been identified and appropriately involved in the implementation process.¹⁴ For the 3rd call in 2015, human rights principles, and consideration of gender and environmental issues were added on. The feasibility criteria also inquired about goals and interests of the relevant stakeholders.¹⁵

While this provided a good basis, the Facility specified neither the groups of stakeholders to be included, did not include further requirements on multi-stakeholder consultation, nor the explicit need to include civil society, affected communities and vulnerable groups.

In preparation of the last call, the NAMA Facility revised the procedures of the NAMA Facility. The simplified selection criteria for the 4th call merely inquired about the roles and responsibilities of other stakeholders. They lacked the criteria about the involvement of stakeholders, their goals and interests, as well as a reference to human rights and gender issues.¹⁶

Sustainable development

Sustainable development benefits are considered at selection phase as well as in the monitoring and evaluation of the NSPs. Assessment criteria inquire about the potential for transformational change including sustainable development co-benefits

The monitoring and evaluation framework of the NAMA Facility entails mandatory core indicators, which all NSPs have to monitor and report on. This includes the number of people directly benefitting from the NSP and the number and type of co-benefits generated (economic, social, environmental).

b) Global Environmental Facility

The GEF was established in 1992 by the World Bank to among other things finance mitigation actions in developing and transition countries. It operates as an international partnership of 183 countries, international institutions, civil society organizations and the private sector. It provides grants and concessional funding as well as technical assistance and capacity building support for measuring and forecasting of emissions.

The GEF operates through its agencies¹⁷ which are responsible for managing the GEF projects. These include a number of United Nations and European Union agencies, which in collaboration with national governments and NGO develop and implement the projects.

For NAMAs, the GEF provides support for enabling conditions for their implementation, such as MRV related capacities. GEF has provided support for at least 9 projects with explicit NAMA support and has contributed to implementation of 4 NAMAs.¹⁸

Criteria for public participation

The GEF support requires public consultations and provides a clear definition of stakeholders to be consulted in the implementation of a NAMA¹⁹. These include project beneficiaries, groups of people who may be affected by project activities, and other groups in the civil society which may have an interest in the project. It obliges GEF partner agencies to work closely with governments and project executing agencies to involve stakeholders throughout the project cycle.

Moreover, the agencies are required to develop guidelines for public involvement in the project cycle of their own GEF financed projects. GEF allows a diversity in approaches to design of public involvement activities that is in line with the project context, but encourages developing modalities for incorporating public involvement and financing to support public involvement activities.

Sustainable development

GEF has several focal areas including biodiversity, climate change, land degradation, international waters, chemicals and wastes. Each focus area includes common quantitative and qualitative indicators and tracking tools. The indicators largely reflect GEF's mandate to deliver environmentally sustainable development and focus largely on environmental co-benefits.

While some indicators also measure social (e.g. number of rural households served by renewable energy) and economic co-benefits (per capita income),²⁰ the GEF is missing a more holistic approach to overseeing sustainable development impacts. In order to fully understand the impacts of GEF projects, it should embrace a more systematic approach that gives more importance to socio-economic factors in its evaluation, such as impacts on livelihoods and well-being.

c) Green Climate Fund

The GCF is becoming a major player in disbursing long-term climate financing for developing countries. It operates as an operating entity of the Financial Mechanism of the UNFCCC, and is accountable to the Conference of the Parties (COP). Over USD 1.3 billion in GCF resources was committed to funding proposals in 2016.²¹

Unlike previous major multilateral climate funds, the GCF is open to a broad base of funding sources, including both developed and developing countries, as well as private financial sources. It includes the Private sector facility with an aim to fully engage private sector and mobilize funding in clean investments, including climate change mitigation and adaptation.

The strength of the GCF lies in its ability to directly accredit national governments or their nominated national and subnational institutions and like this open direct access to the Fund.

While the GCF has not yet supported NAMA development, it is considered to be a key source of NAMA finance in the future. Developing countries see the GCF as a vehicle to finance ambitious NAMAs proposals, but are concerned with its slow and complicated disbursement.²²

Criteria for public participation

The Fund is guided by the Governing Instrument, which stresses the importance of stakeholder consultations and unlike the NAMA Facility identifies stakeholder groups important for participatory processes; including civil society organizations, vulnerable groups, women and indigenous peoples.

The instrument mandates the GCF Board to develop mechanisms to promote the input and participation of stakeholders in the design, development and implementation of the funded strategies and activities. So far this initiative has not been carried out.²³

The proposals must comply with the Fund's interim environmental and social safeguards (ESS), which the GCF has borrowed from the International Finance Corporation (IFC Performance standards), and are subjected to mandatory gender and social assessment. All funding proposals must obtain a no objection letter by the National Designated Authorities or focal points, which seeks to confirm that stakeholders have been appropriately consulted during the design of the project.

The Fund will develop its own ESS within three years and with multi-stakeholder engagement.

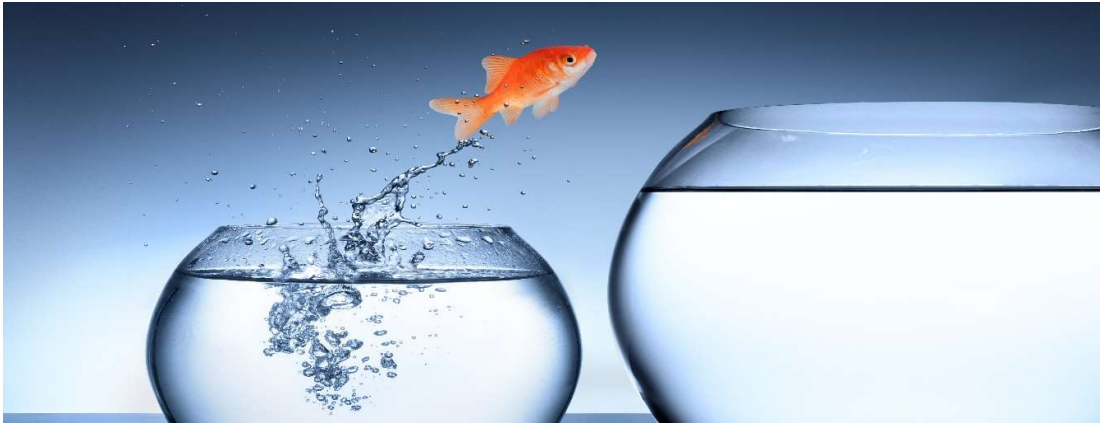
Sustainable development

In addition to GHG mitigation, the GCF also has a mandate to promote environmental, social, economic, and development co-benefits and take a gender-sensitive approach.

Proposals must comply with Fund's ESS and investment criteria. The Board proposes that projects report on at least one-co-benefit.²⁴

The Fund's initial Monitoring and Accountability Framework focuses on projects' compliance with ESS, fiduciary standards, and gender policy. Currently, the Fund lacks the mandate for participatory monitoring as devised by the governing instrument and accredited entities generally self-report.

It foresees an independent redress mechanism for complaints related to Fund operations as well as Board funding decisions.



5. Findings and lessons learned

NAMAs were established as a flexible climate policy tool without an official definition, governance or clear-cut rules. They proved to be a good exercise that paved the way to national level mitigation and provide valuable lessons in structuring national actions for sectoral transformation.

Now, as countries are preparing to implement NDCs both the Paris climate Agreement and the 2030 Agenda for Sustainable Development can help chart a path to sustainable low carbon future. INDC implementation must therefore take a holistic approach to mitigation and development and build on the NAMA experience.

The following lessons can help NDCs drive transformational, inclusive change:

I. Sustainable development

Rhetorically, sustainable development is a key factor in both NAMAs and INDCs. However many countries focus mainly on economic development and the institutional process does not adequately prioritize the oversight of sustainable development co-benefits of NAMAs.

If NDCs are to take a holistic approach to addressing multiple environmental problems simultaneously, they need to consider wider impacts of mitigation action in their design and implementation. Successful NDCs should outline how the proposed contribution matches the needs and priorities of various stakeholders.

These should be clearly endorsed by governments as well as financing institutions involved in the process.

NDCs should improve on the NAMA experience by providing a system for sustainable development assessment, including publicly available sustainable development indicators, and requirements for sustainable development monitoring.

II. Stakeholder participation

Public involvement has shown to be the key in development and implementation of efficient and sustainable NAMAs that reflected public ownership. Like NAMAs, NDCs should aim to build legitimacy and accountability of national action through public support. Moreover, neither NAMAs nor NDCs can drive transformational change without engagement of all actors in the process, especially those most affected by the impacts.

Therefore, stakeholder engagement should be a priority in the strategically planned and guided process. At minimum, individuals or groups or groups of stakeholders should be identified who are affected or likely to be affected by the project or may have an interest in the project.

The governments, as well as financial institutions through their established criteria, should clearly determine how they will ensure all-inclusive stakeholder consultation, respect for human rights, indigenous peoples' rights and gender equality.

NDCs should have clear rules for defining the group of stakeholders to be consulted, information to be made available in the appropriate language and medium, how to collect stakeholder input, and how stakeholder input will be taken into consideration.

III. Financing

Lessons from NAMAs show that in order to secure financing for national-level mitigation actions, developers must address the need to make their projects bankable and fundable. That in first line includes devising a financial mechanism that clearly sets out how national public budgets are to leverage additional sources of finance and provide the level of concessionality needed to make the project feasible. Also, the mechanism needs to address financial risks and returns, co-financing and the role of the private sector, and cost-effectiveness of proposed projects.

NDCs should address financial risks and returns, public resources and leveraging of investments through establishment of rigorous financial mechanism.

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- ³ Paris Agreement, 2015, [here](#)
- ⁴ Cancun Agreements, 2010, [here](#)
- ⁵ World Resources Institute. 2016. Climate Analysis Indicators Tool (CAIT): WRI's Climate Data Explorer, [here](#). Accessed December 5, 2016.
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- ⁹ CCAP, 2016, Technical assistance to enable bankable NAMAs, [here](#)
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This project action has received funding from the European Commission through a LIFE grant. The content of this section reflects only the author's view. The Commission is not responsible for any use that may be made of the information it contains.