

RESEARCH REPORT

# Learning from Direct Access Modalities in Africa

– Executive Summary –

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## Imprint

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# Executive Summary

In the climate finance arena, the Adaptation Fund (AF) has pioneered direct access - an access modality that allows developing countries to receive funds for project and programme implementation directly without going through an intermediary. The international accreditation in 2010 of the Centre de Suivi Ecologique (CSE) in Senegal marked a milestone for the debate on channelling climate finance. The accreditation and subsequent approval of the first direct access project in a least developed country (LDC) in Africa – which Senegal is – offered a new narrative, which assumes that some national structures, even in poor countries, have the capacity to meet international best practice standards in managing funds and are able to submit tangible projects in the adaptation field.

To date, a number of national implementing entities (NIEs) in Africa have commenced the process of programming direct access funding domestically; moreover domestic climate funds (DCFs) in several African countries are similarly grappling with this challenge. These combined experiences provide rich lessons, useful for a decisive phase in the global climate finance architecture - determining how the provision of innovative financing mechanisms and direct access funding instruments will work in practice and allowing inferences about how direct access can be programmed more broadly.

The lessons learnt regarding challenges and enabling factors during accreditation, project development and approval, as well as project implementation can be used to strengthen support processes for the accreditation of future NIEs to the AF and also to the Green Climate Fund (GCF). This is increasingly relevant as the AF continues to operate and constantly expands its African portfolio, while the Green Climate Fund (GCF) is now close to funding operations with the aim to initiate a paradigm shift in climate policy. It is to be expected that such a paradigm shift will 1. need to work on the basis of state of the art in devising climate finance pathways, and 2. constantly try to advance the way funding is spent. A first step regarding this advancement of the international climate landscape to the next level of responsibility is already taken on the level of the AF - during its 24th meeting the Fund approved an enhanced direct access project for South Africa's NIE (SANBI)<sup>1</sup>.

The aim of this report is to support the debates in climate finance – from the AF to the GCF – by providing insights into the processes of programming climate finance domestically for 6 NIEs (NEMA-Kenya, SANBI-South Africa, CSE-Senegal, MINIRENA-Rwanda, ADA-Morocco and FNE-Benin)<sup>2</sup>, 2 MIEs (UNEP in Tanzania, AfDB with its head office in Tunisia)<sup>3</sup> and 2 RIEs (OSS and BOAD)<sup>4</sup> in Africa, as well as 4 domestic climate funds (FONERWA in Rwanda, the CRGE Facility in Ethiopia, the FNE in Benin and the Green Climate Fund in South Africa)<sup>5</sup>.

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<sup>1</sup> See: AFB 2014: Decisions of the twenty-fourth meeting of the Adaptation Fund Board.

<sup>2</sup> NEMA-Kenya (National Environment Management Authority Kenya), SANBI-South Africa (South African National Biodiversity Institute), CSE-Senegal (Centre for Ecology. French acronym for: Centre de Suivi Ecologique), MINIRENA – Rwanda (Ministry of Natural Resources Rwanda), ADA – Morocco (Agency for Agricultural Development. French acronym for: Agence pour le Développement Agricole), FNE-Benin (National Fund for Environment. French acronym for: Fonds National pour l'Environnement).

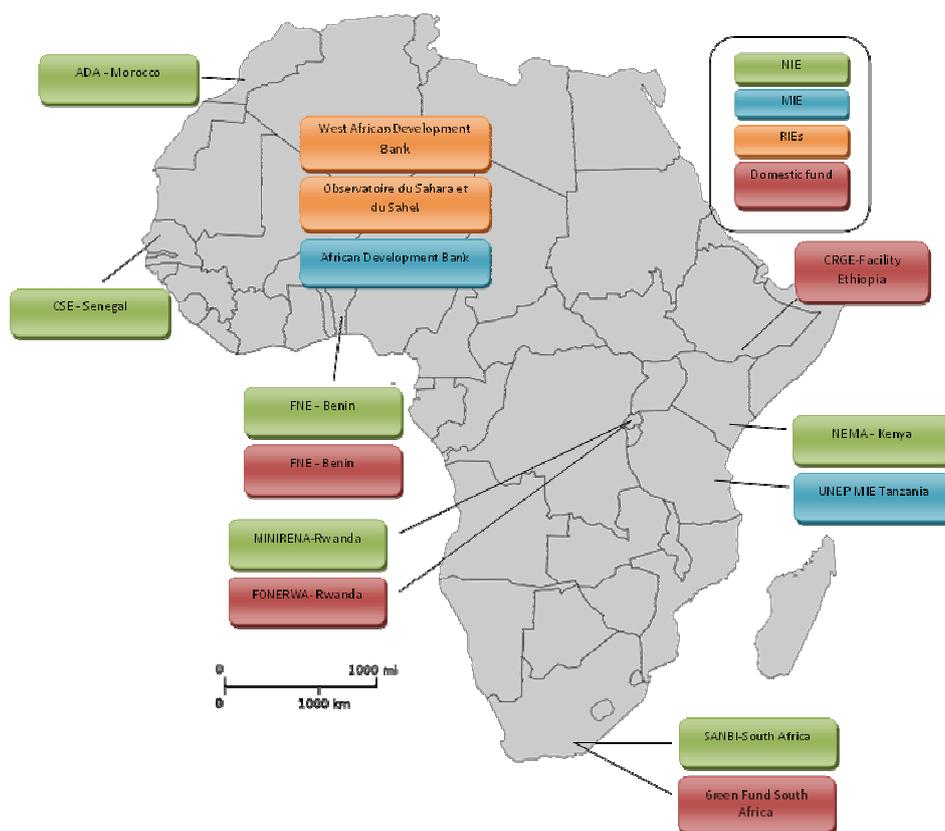
<sup>3</sup> UNEP (United Nations Environment Programme) in Tanzania, the only African country in the AF-Network that implements an MIE project and the AfDB (African Development Bank) with its head office in Tunisia

<sup>4</sup> OSS (Sahara and Sahel Observatory. French acronym for: L'Observatoire du Sahara et du Sahel with its head office in Tunisia), BOAD (West African Development Bank. French acronym for: Banque Ouest Africaine de Développement with its head office in Togo).

<sup>5</sup> FONERWA – Rwanda (Environment and Climate Change Fund Rwanda), FNE-Benin (National Fund for Environment. French acronym for: Fonds National pour l'Environnement), CRGE – Facility Ethiopia (Climate Resilient Green Economy Facility, Ethiopia), Green Fund – South Africa.

The main objectives of the research for this report were to:

- provide major input into the understanding of challenges, enabling factors and benefits related to direct access to the AF (from accreditation, project development and project implementation) as well as document the different ways in which stakeholders, especially vulnerable communities, have participated in the direct access process;
- synthesise success stories for climate-compatible development from the African accreditation processes broader than the immediate lessons for the AF;
- assess the interplay between different AF access pathways in relation to direct access;
- examine examples of DCFs, increasingly relevant conduit for climate finance and leadership, and explore their characteristics, and
- analyse the lessons that can be learned from the AF pioneering experience with direct access for the elaboration of the access modalities and the accreditation process of the GCF.



## The research methodology

In order to learn from the experiences of implementing entities (IEs) and DCFs, the research applied a mix of qualitative scientific methods, mainly using interviews as a research tool. In a first step, we conducted desk research on direct access. This was followed by expert interviews with the AFB Secretariat to identify challenges, gaps, impediments and expectations from the Accreditation Panel to the applicants, as well as challenges that accreditation applicants, particularly from Africa, encounter throughout the accreditation process. This contributed to the development of a guiding questionnaire. This questionnaire was tested on 5–6 May 2014 during a mission in Benin and was later used during the in-country research to conduct in-depth structured interviews. Interviews were conducted by national partner organisations (African members of the AF NGO-Network<sup>6</sup>), or by Germanwatch itself. The process helped collect the views of

<sup>6</sup> The Adaptation Fund NGO Network is a coalition of non-governmental organisations (NGOs) and interested stakeholders following the development of the AF and its funded projects. The Network strives for a sustainable dynamic influence on

relevant actors (representatives of the respective IE and designated authorities (DAs), environment and finance ministries, and civil society and other stakeholders in the project area) on challenges and best practice regarding all aspects of IE accreditation, project design and implementation.

### Adaptation Fund NIE experiences in Africa

This report describes various NIE experiences during the processes of accreditation, project development and approval as well as during project implementation. Moreover, the report highlights factors that are important for sustainability of the interventions, such as stakeholder consultation and involvement, as well as mechanisms to ensure that the needs and concerns of vulnerable groups are fulfilled and that gender issues are addressed. To provide an overview of these issues, all processes are analysed and structured along three categories and respective guiding questions: (a) Challenges: What kind of challenges did NIEs encounter in each phase? What did they find particularly difficult? (b) Enabling factors: What kinds of factors were supportive to successfully accomplish this phase? (c) Benefits: What kind of positive impacts did this process have? Both direct (for the NIE, the project) and indirect impacts (effects beyond the NIE scope, for the national level) are taken into account.<sup>7</sup>

**Accreditation process:** In retrospect (all consulted NIEs are accredited) NIEs identified capacity-related **challenges** as the greatest barrier. According to interviewees, there is a significant need for time to develop these capacities before the accreditation process is undertaken. Moreover, the duration of the process was identified as a problem, as were certain underlying problems (such as change of government, loss of key staff members). Other major challenges named by the interviewees were the language barrier for non-English speaking countries and the lack of ability to meet fiduciary standards, in particular the demonstration of measures and policies in place to promote transparency and combat corruption. When asked about any **enabling factors** that could guide NIEs still in the process of accreditation, NIEs highlighted that those are to be found both inside the NIEs (eg, experience in project development, management and implementation) and outside the reach of the NIEs themselves, namely domestic support and a committed DA. Respondents urged the need for participation of key institutions, stakeholders and forums in the selection process – ideally through a national climate change committee – in part to avoid claims of political interference. In addition to institutional capacity-building as a direct positive impact of the accreditation process, respondents noted that accreditation had significant indirect **co-benefits** for catalysing and revitalising scientific research on mitigation and adaptation at the country level moreover, helping to revitalise commitment to good governance and existing national adaptation plans.

**Adequacy of support from the AF during the accreditation process:** NIEs perceived the assistance from their contact person as well as site visits by the AF as very **helpful** in navigating the strict requirements and high volume of support in documentation requested. NIEs also indicated that the AF website was a good resource, providing a lot of information. However, they noted that the structure of the website could be overworked as information was sometimes hard to find. Interviews revealed that **weaknesses** exist mainly in regard to the process' duration as well as in communication, which is often unclear and inconsistent. It should be noted that many interviewees stated that NIEs perceived the process to be inflexible and intrusive. Respondents therefore recommended the AF to be more flexible about what qualifies as sufficient evidence of the application of policies and standards, as this is a challenge for newly established organisations and

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politics and the engagement of civil society. It is hopeful of contributing to a successful implementation of AF-funded projects in developing countries, for the benefit of those people and communities particularly vulnerable to climate change. For more information, see [www.af-network.org](http://www.af-network.org).

<sup>7</sup> It must be noted that the below presented insights are deliberately not assignable to specific NIEs as the NIE representatives asked us to not mention them by name. Statements may therefore reflect individual experiences and should not be generalized.

highly centralised entities that are subject to frequent political changes (eg, ministries). They also recommended to streamline the accreditation process so that it is shorter and does not require the involvement of as many people/entities in the recipient countries. It must be noted, however, that all interviewed NIEs have been accredited since 2012 at the latest and hence did not mention the AFB readiness programme, which was approved in November 2013<sup>8</sup> and aims to strengthen national and regional entities' capacity to receive and manage climate financing as they adapt and build resilience to changing conditions in sectors ranging from agriculture and food security to coastal zones and urban areas. This demonstrates that the AF has recognized the needs identified in this research report and taken a step in the right direction.

## Recommendations for the accreditation process

### For NIEs

- Conducting a self-assessment of compliance with AF fiduciary standards beforehand (and taking the necessary remedial measures) can save time and effort during the accreditation process.
- NIEs should plan in time for developing human and management capacities before the accreditation process is undertaken.
- During the accreditation process it is essential to engage national departments, align with national priorities, unlock domestic support and build on existing initiatives.
- DA play a significant role not only in ensuring the success of the accreditation process but also in assuring country ownership and providing leadership for the overall process
- NIE accreditation should be seen as a first stage in the long journey towards implementing adaptation projects and improving adaptive capacities. Where necessary, NIEs could establish partnerships with external service providers competent in key areas such as financial management and accounting in order to bridge capacity gaps.

### For the AF

- Information about the accreditation process should be communicated in clear, accessible language and through various channels/formats (eg, print and electronic versions). This includes information that explains that accreditation is not the end of the process, but only a milestone in securing AF resources.
- The AF should upgrade the accreditation toolkit and integrate the Fund's environment and social safeguards.
- The AF should enhance tools for self-screening of project proposals.
- The AF should provide applicants with examples of past accreditation submissions that meet different fiduciary standards and environment and social safeguards.
- Key documents should be translated into different languages.
- Findings from the readiness activities conducted by the AF and other stakeholders should be integrated into the operations of the Fund.
- South-South cooperation that extends beyond AF's readiness activities should be promoted.
- The AF should establish a network of practitioners for enhanced knowledge-sharing on the accreditation process and beyond.

<sup>8</sup> See: <https://adaptation-fund.org/node/3939> and AF 2014: Programme to Support Readiness for Direct Access to Climate Finance for National and Regional Implementing Entities.

**Project development and approval process.** After achieving accreditation, NIEs need to prepare for their core task as implementing entities, namely the development and implementation of adaptation projects. The post-accreditation stage is a decisive phase for the later success of project development and implementation. In order to be successful, project proponents must show how the activities contribute to resilience, how vulnerable people benefit from the intervention, how they will minimise negative side-effects, how to capture learning, etc.<sup>9</sup> Although major challenges lurk in the process, these are often underestimated by NIEs. The post-accreditation phase is, therefore, an important opportunity for NIEs to learn from other forerunners to successfully cope with these challenges.

For projects larger than US\$1m, the AF offers two possible routes to project development and approval: either the NIEs undergo a one-step process and directly submit a full proposal or they decide on a two-step process and submit a project concept first and then work on the full proposal only after the concept has received guidance and been approved by the AF. The fully developed project proposal is then reviewed and approved in a second step. Most countries indicated that they followed a two-step submission, as the AFB Secretariat advised this to be the most likely to deliver a positive result. They used this opportunity to better understand the process and its requirements hence concluded that for subsequent applications, they would be in a better position to use a one-step process. According to NIE interviewees, **challenges** during the proposal development and approval process could be attributed to two factors: on the one hand, the early stage of adaptation planning in most of the countries impedes effective planning. On the other hand, lack of clarity regarding the process, including when to expect decisions that advance the process, which would help NIEs to better prepare for and plan the process. NIEs noted that the main challenge of the post-accreditation process was the time lapse between accreditation and proposal endorsement. Some NIEs expressed their frustration with the fact that undergoing a thorough and time-consuming accreditation process did not result in the immediate disbursement of funds by the AF. Yet more time, effort and money was channelled into preparing project proposals that had to be approved by the AF before project financing would be disbursed. Without the Project Formulation Grant, many NIEs would struggle with proposal development in the post-accreditation phase. However, most respondents refer to the small sum disbursed by the fund compared to the cost of activities necessary to develop a proposal. NIEs noted ‘experience in project development’, ‘support from consultants’, ‘a consultation process including NGOs, community-based organisations (CBOs), academia and the private sector’ as well as ‘engagement of people on the ground through participatory needs assessment’ as **enabling factors**. Moreover, NIE interviewees emphasised that once the entity looked beyond their traditional scope regarding thematic sectors they work on and actors they work with, this became a major enabling factor during this phase.

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<sup>9</sup> AF 2013: Instructions for preparing a request for project or programme funding from the Adaptation Fund.

## Recommendations for the project development and approval process

### For NIEs

- The demands of the transition from accreditation to submission of the first project proposal are often underestimated. The process of identifying projects should start as early as possible to capitalise on the positive momentum from accreditation.
- There is no single recipe for identification of proposals to be submitted to the AF. Countries have been using different approaches, addressing an area of vulnerability in accordance with national plans and strategies, taking a problem-solving approach or making a nationwide call for proposals.
- On balance, an open and very transparent call for project proposals seems to yield more benefits than a closed internal process to identify and conceptualise projects (eg, the benefits include boosting innovative collaborations to deal with complex adaptation issues).
- A two-stage project submission to the AF (concept followed by a full proposal) is recommended for the NIE's first project; this creates a test-bed and richer learning experience for the NIE to familiarise itself with the process and allows accessing the project formulation grant.
- The Project Formulation Grant is a useful resource to finance feasibility studies, environmental and social assessments, and stakeholder consultations.
- Project design should take a holistic view of what is in the public interest instead of focusing too narrowly on the NIE's established *modus operandi*.
- Where possible, a multi-stakeholder steering committee spanning national and local levels should be established to guide NIE work. Doing so will increase ownership and help to reflect all views and concerns.
- The stakeholder consultation process should put the most vulnerable groups at the centre of the project (eg, women and youth); and should be an ongoing interactive and iterative process and partnership that starts, ideally, with the identification of proposals. It should also develop a stakeholder consultation plan, which should later on track the level of engagement of different stakeholders.

**Implementation of approved projects:** After projects have been approved, new challenges await the NIEs. Regarding African NIEs, so far only Senegal, Rwanda and recently South Africa and Kenya have reached successful approval of a project, to date, only Senegal is in the process of implementation. The **challenges** in the implementation phase therefore mainly refer to Senegal, reporting that they struggled with delay in project implementation, difficulties in coordinating and managing the range of information and people as well as the compliance with the AF Environmental and Social Policy (ESP). But we also asked NIEs not yet involved in the process about **anticipated challenges**. All of the respondents who gave input on this question expressed concerns that current developments may impede future project implementation, particularly national pressure to quickly work out a project proposal even though key processes take time (eg, identifying existing approaches to link into them). The interviewees anticipated that a rushed project design phase (due to lack of funds or other reasons) will later provoke delays in project implementation later on. NIEs

mentioned ‘regular meetings of NIEs’, ‘technical committees and executing entities’ and ‘the establishment of standing steering committee for projects early on’ as **enabling factors**. Furthermore, they recommended ‘building on existing structures and using existing capacities effectively’ and ‘leveraging existing governance and compliance practices to facilitate AF project implementation and reporting.’ **Benefits:** In general, respondents took the view that the project implementation phase in particular will be a learning process. For many NIEs, it is the first time they will have been responsible for projects – therefore, each project will have lessons for others.

## Recommendations for the project implementation process

### For NIEs

- It is strategic to establish an NIE steering committee, including key sectors, so as to ensure that the Adaptation Fund project can positively influence national adaptation strategies while at the same time national policies and processes are supported. A platform like this can lead to innovative collaboration and a new approach to dealing with the complexity of climate adaptation. For reasons of cost-effectiveness, an existing committee could be charged with this task.
- Meaningful adaptation takes time and truly consultative processes need careful facilitation to ensure that the needs of the most vulnerable are directing project identification and planning. Once this process is carried out thoroughly and there is true local ownership of the project, implementation can proceed without delays.
- It is important to create synergies in addressing adaptation – and to ensure that adaptation processes support national development pathways.
- Procurement procedures are time consuming: the earlier they are taken into account, ideally during the proposal development process, the less time will be lost in starting implementation. Given the importance of this process, it is advisable that NIEs employ staff dedicated to procurement.

### For the AF

- The AFB must be supportive of learning processes and build local processes and structures to support learning. This can be achieved through specific guidance in its Knowledge Management Framework, which should put more emphasis to knowledge sharing and gathering at community level.
- The Project Formulation Grant is critical to different studies, such as environmental and social assessments, as well as for conducting meaningful consultation. The AFB should review its policy, and should especially consider added requirements by project proponents. Specifically additional resources could be granted for ambitious adaptation projects, or projects with high environmental and social risk, as to allow further in depth consultation before submission of the fully developed projects.
- Case studies of, and communication tools for, good implementation practice under the AF will facilitate the work of NIEs.
- The AF should strengthen the networks and forums for NIE and practitioners to facilitate and encourage knowledge-sharing among members that have been build up as part of the readiness programme.

**Stakeholder consultation and integration.** Earlier research has shown that including civil society early in the NIE accreditation process is beneficial for later phases of project implementation. Consultation is necessary to understand potential obstacles and risks, define problems and identify their causes, get an overview of existing measures, maximise synergies, avoid duplications and ensure coordination. Consultation may show appropriate strategies and actions to address needs and achieve desired outcomes. Additionally, consultation helps save time, raise awareness, increase the participatory involvement of members of society and the project, share experiences and knowledge, reduce costs, and improve project performance and impact. According to the interviewees, stakeholder consultations have taken place in all six cases, although with varying extent and intensity. Stakeholders were: a) consulted regarding all relevant processes from the beginning to the end (accreditation, project identification, project development); b) consulted during particular processes (eg, elaboration of the project); c) involved in the call for proposal process, where they could hand in proposals. NIEs used different methods for stakeholder involvement, ranging from consultation through visits (field visits; community visits, household level visits); discussion groups and workshops or vulnerability assessments to real involvement through integration of stakeholders into steering committees and forums (eg, local steering committees, joint action development forum) or joint action development forums. NIEs perceived time and money as **major challenge** in the stakeholder consultation process. The formulation of projects including a wide stakeholder consultation process is expensive and takes time. Respondents described a tension between limited funding and participatory and integrated project design. The US\$30,000 for project formulation was less than actual cost (covering an estimated 25% of actual costs). Challenges were moreover the expectation management, asking the right questions and the lack of comprehensive guidance from the AFB regarding consultations. When asked for **enabling factors**, respondents reported that it is important to ‘adjust the consultation process according to local conditions regarding both selection of stakeholders and modalities of consultation’ and to ‘obtain permission for working at the community level from key authorities.’ As **benefits** of the consultation processes, NIEs highlight the ‘awareness raising process for projects at local level’, the ‘focus on most vulnerable’, the ‘inclusion of local knowledge and expertise’ and the ‘establishment of a relationship crucial for the later implementation process’. Respondents further described meaningful consultation as an opportunity to foresee and/or resolve potential obstacles, constraints and conflicts and distribute benefits equitably.

### Individual country success stories

To synthesize success stories for climate-compatible development from the African accreditation processes broader than the immediate lessons for the AF we took a detailed look at three NIEs: The Centre de Suivi Ecologique (CSE) in Senegal, the South African National Biodiversity Institute (SANBI) and the Rwandan Ministry of Natural Resources (MINIRENA).

**The example of the Centre de Suivi Ecologique (CSE) in Senegal shows that early inclusion of civil society can contribute significantly to successful accreditation and an efficient project development and implementation process.** In 2010, CSE was the first NIE to be accredited globally. According to interviewees from the CSE and civil society, one major factor contributing to both CSE's successful accreditation and its fast-track programme approval was the early inclusion of civil society. Senegal made great efforts to actively include civil society from the outset at all stages of the process. The nomination of CSE as NIE was based on a proposal by the national committee on climate change (COMNAC, French acronym for Comité National Changement Climatique), a national committee which, besides ministries, private sector, universities and research centres, is composed of NGOs, local communities and civil society associations. Close involvement was furthermore realised by meetings held with NGOs and CSOs and conducting stakeholder consultations during the accreditation phase as well as during the elaboration of the programme. According to respondents, four key effects of early civil society inclusion were crucial to the suc-

cess of accreditation and project approval: **(1) Establishing a relationship to build on:** Early inclusion of civil society helped to establish good contact with national civil society organisations. The relationships established at this stage were useful for making later decisions about adaptation projects. **(2) Using civil society as ‘early warning system’:** In its ability to publicly criticise and denounce NIE activities, NIE coordinator Dethie Soumare Ndiaye perceived civil society to be an ‘early warning system’<sup>10</sup> used by the NIE, anticipating what would be criticised by civil society and taking preventive measures regarding these issues. **(3) Striving for transparency and credibility:** Interviewees highlighted the advantages of civil society acting as an independent judge of NIE activities, adding to project credibility.

**In South Africa we moreover found an example for testing enhanced direct access.** The South African National Biodiversity Institute (SANBI) was accredited as South Africa's NIE in 2011. One of their recently approved projects is the Small Grants Facility (SGF), a pilot project to test a mechanism for enhanced direct access in South Africa. The main objectives of SGF funds are to understand climate change impacts and to identify local climate change risk. NIE director Mandy Barnett<sup>11</sup> has emphasised that the SGF prioritises active stakeholder engagement, in both its procedures and its funding decisions. The decision on three particular investment windows was based on a participatory vulnerability assessment identifying a set of stressors. The assessment process was characterised by a high degree of stakeholder involvement, facilitated by six community workshops, two community group meetings, and several meetings with organisations from different sectors (eg, health, water). Barnett describes the SGF as an effective and transparent way to channel money to communities. Through the NIE Steering Committee, there is support from government to explore how to scale up this process nationally should the pilot be successful. Barnett is very positive regarding SGF success so far. In South Africa, the small grant hence shows that the applicability of enhanced direct access may be tested on a local scale that later can be scaled up on national level.

**Finally, Rwanda was examined, where NIE adaptation efforts were scaled up with a domestic fund.** The Rwandan Ministry of Natural Resources (MINIRENA), Rwanda's NIE, was initially registered with the AF in August 2010; accreditation followed on 9 February 2012. In 2012, MINIRENA was able to access a grant of \$30,000 for project development from the AF, and the proposal development process took most of 2012. The proposal was revised twice before it was approved in 2013. A significant contribution to MINIRENA's success in the project development process was FONERWA, a direct access fund for NGOs, districts, private sector and government that aims to achieve development objectives of environmentally sustainable, climate resilient and green economic growth and to benefit affected rural communities. FONERWA was established as the national instrument through which environment and climate change finance for Rwanda would be channelled, programmed, disbursed and monitored. With its objective to channel resources to where they are most effective and to raise opportunities for climate change finance, FONERWA actively supported the process of project development in support of MINIRENA as the NIE. Fund Coordinator Alex Mulisa explained that FONERWA approached the NIE based on their experiences with project development processes, the potential to meet standards and related support needs of producing a quality proposal to AF.<sup>12</sup> During the process of project development, FONERWA supported the NIE with technical expertise, particularly for the consultation process as well as with financial support. With support from FONERWA, MINIRENA drafted a well-developed concept note. As a result there were no great differences between the concept note and the full proposal that was finally approved. The project approved by the AFB on 1 November 2013 is entitled ‘Reducing

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<sup>10</sup> Interview with Dethie Soumare Ndiaye (CSE).

<sup>11</sup> Interview with Mandy Barnett (SANBI).

<sup>12</sup> Interview with Alex Mulisa (FONERWA).

vulnerability to climate change in north-west Rwanda through community based adaptation'. Of the total grant of US\$9,969,619, an amount of US\$3,249,920 has been transferred to date.

### MIEs and RIEs in Africa and their role in direct access

Ideally, direct access and internationally intermediated access should not be mutually exclusive – recipient countries should be in a position either to choose the access modality that best fits their circumstances (in which case, direct access is an option, but not a priority) or to utilise internationally intermediated access in the early stages, and later make a transition to direct access (in which case, direct access is the overarching priority.) In this chapter, we seek to shed light on the role of internationally intermediated access and direct access in Africa. We compare insights from Tanzania – the only African country in the AF-Network that implements an MIE project – with discussion with representatives and staff members of other MIEs such as the AfDB. These views are complemented with arguments from literature and international discussions at the AFB level.

**Discussion of advantages and disadvantages of internationally intermediated access:** The section will attempt to explain why MIEs, despite the possibility of direct access offered to countries by the AF, have dominated the AF portfolio in term of projects approved. What's a country's motivation to choose internationally intermediated over direct access? Interviewees named "bridging capacity bottlenecks" as main **advantage** of internationally intermediated access. Government officials in Tanzania confirmed that the decision on MIE project implementation came about because accreditation of an NIE was not achievable at that time. There was high expectation of securing AF funding through an MIE. The specific choice to submit the project through UNEP as the favoured MIE was based on several factors. Synergies in the implementation of National Adaptation Programmes of Action (NAPA) projects funded by the Least Developed Countries Fund (LDCF) was among the highest ranked. The project focuses on a similar problem and follows a similar implementation arrangement, including the same Project Steering Committee. In addition, there was already experience around the UNFCCC-mandated Technology Needs Assessment for Tanzania that was implemented through UNEP. Also, according to country officials, UNEP has a track record in overseeing similar projects and expertise in the field of coastal adaptation measures. Representatives from MIEs, responding to the question of why to engage with countries on MIE projects, mentioned capacity bottlenecks – especially in LDCs – as the major motivation. In order to swiftly respond to urgent adaptation needs, countries with low capacity, and also small islands states, will be using the MIE pathway in the near future. Representatives confirmed that the project development phase benefits from technical support that can be facilitated either directly through technical teams at headquarters or regional level, or through international consultants. Major factors determining the exact forms of support are, for example, the language in the country of operation.

Moreover, interviewees named two particular **disadvantages** of internationally intermediated access. (1) MIE project management fees are consistently higher than those of comparable NIE projects. MIE management and execution fees are roughly 1.5 times higher than those of NIEs. Moreover, the implementing fees for NIEs are consistently lower than those charged by MIEs, with three NIEs charging less than 5.5%. For the ten countries in the SSA region, UNDP and UNEP have charged an 8.5% management fee in all cases, while the Ministry of Natural Resources in Rwanda charged 6.4% and CSE in Senegal charged 5.1%, the lowest management fee rate recorded so far under the AF. This difference between MIE and NIE fees may be a contributory factor behind the political interest in the direct access model. The findings provide an indication that NIEs are more cost effective than MIEs; however, it is yet to be seen how they will perform and achieve their objectives. As all AF projects are in the implementation phase, it is not possible to reach any general conclusions at this stage. (2) There are additional and prolonged communication, decision-making and project reporting requirements from MIEs resulting in delays in the project development and implementation that are, at least in Tanzania, due to MIE centralisation. Project coordi-

nation is done at headquarters with only light engagement in Tanzania (one officer). Respondents felt that issues with communication and decision-making processes contribute to the delays. While generalising from the Tanzania example should be avoided, observation by the AFB Secretariat seems to suggest that there is a difference in the time that NIEs and MIEs take from proposal endorsement to project inception. This is not necessarily a fault of the MIE agencies. Statements by MIE representatives say that delays are often caused by key personnel changes (at both political and technocrat level) in the host country. It was also reported that the level of responsiveness in national ministries is often very low and bureaucracy is high. Additionally, the DAs are often not politically empowered to take certain decisions – if they were empowered, this could facilitate a smoother implementation phase.

Based on the research, it can be assumed there are several reasons, why – despite the opportunity of direct access to the AF– developing countries have approached MIEs to submit and implement projects on their behalf. As the services provided by MIE are demand driven, it stands to reason that there is an ongoing need for African countries to harness the expertise of the MIEs. This is particularly relevant in cases where the accreditation of national entities in the near future is not realistic because of a range of potential shortcomings. The choice of MIEs to submit and manage projects funded by the AF seems to be part of a short-term strategy of developing countries to address urgent adaptation needs. In the long-term, however, there is an understanding that countries are striving to accredit their own institution and strengthen the national climate finance institutional set-up so as to be better equipped themselves to address the impacts of climate change.

**Active transition from multilateral to direct access:** One of the main issues that came up in the interviews and during the workshop held in Nairobi relates to the question of how the transition from multilateral to direct access in developing countries could be more purposeful and better managed. As seen, the choice of an MIE to implement a project on behalf of a country does not mean that this country does not wish to accredit its own institution or explore other access modalities beyond intermediary access. The AFB is relatively silent on this topic. There is neither guidance nor internationally formulated expectation on this particular issue. Based on the mandate, the AF is to finance concrete adaptation projects and not necessarily provide capacity building support for NIE accreditation. However, the AF has to some extent been funding capacity building, although integrated as a component of concrete adaptation projects and not directed at institutional capacity building for NIEs. While Tanzania is a real case of a transition to direct access, interviews did not give an indication that this process was actually actively managed by the MIE in the country. It remains to be seen how things will evolve, once Tanzania's NIE is accredited. Generally, however, many MIEs such as UNEP are in a strategic position to facilitate a transition. First, they are familiar with the landscape of actors in the country and work with them on a regular basis. Secondly, they have their own accreditation and project implementation experience. And thirdly, they often have a support mandate and, in many cases, resourced capacity building projects. The UNEP representative described this strategic space as 'the role to connect the dots.' The steps for an active transition from multilateral to direct access under the AF could include general steps such as a NIE (accredited or prospective) playing an active role in the project development cycle of a MIE project in the relevant national boundaries. It could include a regular exchange on the operation of the projects or a role in the preparation of the annual performance report. Importantly, the NIE would be included in the knowledge management processes, including monitoring and evaluation missions.

**RIEs – still defining their role for Africa:** The discussion on the matter of RIEs was initiated at AFB level in 2010 at the 13th meeting of the AF. RIEs are positioned between MIEs, and NIEs. So far, the AF does not allow regional projects, yet the idea of a regional pilot project was approved at the

24th AFB meeting in October 2014.<sup>13</sup> In its 24th meeting, the AFB decided to initiate steps to launch a pilot programme on regional projects and programmes, not to exceed US\$ 30 million. This pilot programme will be outside of the consideration of the 50% cap on MIEs and the country cap. RIEs and MIEs that partner with NIEs or other national institutions would be eligible for this pilot programme. The AFB will request the AFB Secretariat to prepare, for the consideration of the AFB before the 25th meeting of the AFB, a proposal for such a pilot programme based on consultations with contributors, MIEs, RIEs, the Adaptation Committee, the Climate Technology Centre and Network, the Least Developed Countries Expert Group and other relevant bodies, with the view of making a recommendation on possible options on approaches, procedures and priority areas for the implementation of the pilot programme.<sup>14</sup>

So far, two African institutions have acquired RIE status under the AF: the West African Development Bank (BOAD), and the Sahara and Sahel Observatory (OSS).<sup>15</sup> An interview with a representative of the OSS was conducted to obtain a self-assessment of an RIE and to draw conclusions regarding this AF pathway. The interview revealed that the OSS sees three roles for its institution: **(1) Facilitating access of member countries** to the AF by submitting project proposals to the AF on their behalf. **(2) Capacity-building on climate change adaptation** in member countries by sharing its experience and knowledge in the development and implementation of regional programmes and projects. **(3) Implementing regional, cross-border projects** for cross-border problems (eg climate migration). There are many issues that require regional coordination, such as rangeland or water resource management, as the problems are not confined by national boundaries but defined through natural boundaries determined through the climate, the water basin, the geomorphology, etc. One point to consider is that one regional project alone submitted by a RIE, such as OSS on behalf of 10 countries, could potentially exhaust all the funding available within the AF. In addition, funding regional projects will require much more guidance from the AF because regional projects, in the strict sense, are very few in the field of adaptation. Furthermore, the AF will need to clarify the implementation arrangements for regional projects, the disbursement and allocation criteria of resources among participating countries, as well as the application of the country cap in the context of regional projects.

### Domestic climate funds: example from Africa

The international climate finance landscape is fragmented, with a number of funds established under and outside the UNFCCC pursuing different objectives, applying different allocation frameworks and eligibility criteria and offering different access modalities. In response to difficult access to climate finance, and to a growing need to better integrate climate policy and action in the overall government portfolio, some countries have created DCFs with hope that their intervention will help the countries and their different stakeholders to set national priorities and implement them with international and national sources of finance for climate change. Importantly, DCFs often lessen the divide between mitigation and adaptation, and instead support greater green growth and climate resilience objectives.

This chapter takes a deeper look at **DCFs in four African countries: FONERWA in Rwanda, FNE in Benin, CRGE-Facility in Ethiopia and the Green Fund in South Africa**.<sup>16</sup> It was found that the four

<sup>13</sup> See decision B.24/30 in: AFB 2014: Decisions of the twenty-fourth meeting of the Adaptation Fund Board.

<sup>14</sup> Ibid.

<sup>15</sup> The Sahara and Sahel Observatory (OSS) is an independent intergovernmental regional organisation officially established in 1992 based in Tunis, Tunisia. OSS, composed of 22 African and five non-African member countries, as well as ten member organisations, acts as an initiator and facilitator of partnerships around common challenges related to the management of shared water resources and the implementation of multilateral environmental agreements, including those on desertification, biodiversity and climate change.

<sup>16</sup> FONERWA – Rwanda (Environment and Climate Change Fund Rwanda), FNE-Benin (National Fund for Environment. French acronym for: Fonds National pour l'Environnement), CRGE – Facility Ethiopia (Climate Resilient Green Economy Facility, Ethiopia), Green Fund – South Africa

domestic fund models in Rwanda, Benin, Ethiopia and South Africa do not focus only on adaptation policies. Rather, they centre around the vision of a green economy and highlight a strong development relevance. Often, they are supported by a national vision endorsed at high political level on elements of achieving economic development and a healthy status of different natural resources. In terms of securing funding for green policy initiatives, both domestic and international sources have a role to play. Benin and South Africa, for instance, have both channeled national resources but have not yet successfully managed to tap into international climate finance flows. Ethiopia and Rwanda, however, are examples where international climate finance (predominantly bilateral) has been disbursed. Benin is remarkable in earmarking a national tax for funding environmental programmes. Also, the newly created DCFs often emerged from previously established environmental funds with a subsequent change in mandate to accommodate climate change considerations.

In terms of **policy guidance**, leadership of the institution often lies with the Ministry of Environment. All researched domestic fund arrangements included strong elements of inter-ministerial coordination in governance arrangements. In some cases, the fund is directly connected to general national governance arrangements on climate change, eg, a national committee on climate change. In terms of vertical integration, however, there seems to be no concerted effort by the four domestic funds to integrate fund operations towards municipal and local levels. Governance arrangements mostly represent considerations of horizontal integration between different line ministries. There are different levels of stakeholder participation in the four examples, with CSO representatives present, for instance, on the governing board or the management committee of the funds. The application of social and environmental safeguards is not clear in all funds. In the case of South Africa the system relies on the safeguards applied by the host institution of the fund, the DBSA. This is similar for the grievance system. In terms of grievance system more generally, there is room for improvement, with it not being communicated as one of the core features of the fund. Different models exist in terms of finance disbursement, including both active and passive calls for proposals. Often, portfolio allocation according to themes, were applied. Financial management differs between the funds. While Ethiopia, Rwanda and Benin operate grants-based only South Africa

As **soft factors for successful establishment** we could identify e.g. (a) the presence of anti-corruption policies; (b) a cross-sectoral nature of a domestic fund as well as the inclusion of a range of government stakeholder inputs in the design of operational modalities; (c) operational arrangements that have already, and will continue to be, subject to continual review and revision, to ensure they align fully with evolving circumstances and needs; (d) the considerable appetite by the government to change and innovate to take advantage of new funding opportunities, reflecting the transformative ambition of the domestic fund; (e) the establishment of domestic fund units within the existing structures of line ministries; (f) the use of the existing public financial management system, which is cost effective; (g) high-level buy-in (especially the Prime Minister's engagement regarding climate change); (h) the quick capitalization of the fund by developing partners.

In addition, we aim to highlight **elements that are specific to the DCF**, yet which allow for wider conclusions in the discussions around domestic funds. For Ethiopia, we highlight the DCF and its impact on mainstreaming the climate change imperative into the development agenda. South Africa has the only domestic fund that owns blending abilities, which require different, more complex and specified financial capacities – that is, banking functions – therefore restricting the type of institutions at national level that can be involved. Benin should be explored in terms of its funding mobilisation through a national eco-tax. And in Rwanda, finally, we highlight the institutional arrangement between MINIRENA, REMA and FONERWA allowing close cooperation and the support of the national NIE by the fund.

### What is next for direct access?

In this chapter, a closer look is taken at the lessons that can be learned from the AF pioneering experience with direct access for the elaboration of the access modalities and the accreditation process of the GCF as they are finalized. Over its last several meetings, the GCF Board has made significant progress in defining its accreditation framework and initial environmental and social safeguards (ESS) and elaborating fiduciary principles for GCF-accredited institutions as well as an approach that will differentiate accreditation procedures based on the risk, scale, complexity and financial nature of the projects and programmes to be implemented by each respective accredited organization (the 'Fit-for-purpose' accreditation approach). The GCF Board has also started to discuss the possible modalities that would further enhance direct access and is preparing a pilot phase for such modalities. It has also defined how country ownership, a guiding principle for the GCF, can be operationalised, including through the provision of readiness and preparatory support to enable direct access of countries to the Fund and in support of National Designated Authorities (NDAs) or focal points. These most recent decisions are observed and their implications for the ability of African NIEs to take on a strong implementing role for the GCF are analysed, through which discussion of challenges and recommendations for strengthening their involvement in both the AF and GCF contexts are presented.

The report found that the GCF could learn the following three points from the AF:

**1) The accreditation process:** In summary, the guiding principles for the GCF accreditation process stress the dynamic nature and continued update of its standards and safeguards based on international best practices which are evolving and on accountability, transparency, fairness and professionalism. It aims to balance reliability and credibility and robustness of its standards while retaining flexibility to accommodate different institutional capacities and national realities. These principles – while short of implementation experience – in theory address many of the concerns raised in the research for this paper. For instance, the GCF in its Barbados decision on the accreditation framework components acknowledged the severity of the language barrier for countries where English is not an official language. The Board therefore requested the GCF secretariat to work on a way to allow for the submission of applications in other United Nations official languages with due consideration of implications in terms of cost and complexity.<sup>17</sup> This rule to address the language barrier should not only apply to the accreditation process, but such a level of flexibility should also be granted for the submission of project and programme proposals, particularly by national and sub-national implementing entities. At this stage, in which decisions are still largely on the conceptual level but have not yet been implemented, it is difficult to assess the extent to which the GCF accreditation framework will be able to overcome some of the identified shortcomings from the AF experience and which new GCF-specific obstacles might become apparent. The good intentions by the GCF to accommodate in its framework for accreditation the realities in developing countries as well as the lessons learnt from other funds by giving due attention to the capacity constraints in developing countries are apparent. The accreditation-focused component of the GCF readiness programme, the 'Fit-for-purpose' approach, in combination with a scaled-risk programme and project categorization and a fast-track accreditation mandate are illustrative attempts to address this. At this stage of the process, all of the implications of the accreditation decisions of the 8th Board meeting of the GCF cannot be considered in full detail due to a lack of detailed decision documentation (specifically, the annexes to the decisions, which include the operational part of the Board's decisions, were not yet available as of mid-November). As the GCF is also not yet fully operational an analysis of the implementation of the accreditation process will have to wait.

However, it is to be expected that the challenges African NIEs have faced with their accreditation to the AF could be repeated for new domestic African entities looking to work with the GCF. As the

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<sup>17</sup> Decision B.08/06. In: GCF 2014: Application Documents for Submissions of Applications for Accreditation, para (c).

research and analysis on the experiences of the African NIEs to the AF has shown, there is no single template for successful accreditation. Self-assessment tools should be made available to give interested entities a good first estimation of their respective strengths and weaknesses, and to gauge the prospect of accreditation success as well as help with expectation management. Learning from the AF experience, the GCF Secretariat should thus focus particular attention on the development of such a self-assessment tool as part of a broader accreditation tool-kit, which should provide step-by-step guidance to countries on how to find the right institutions. In contrast to the AF, where developing countries generally accredit only one institution (given the reality of the AF country cap of US\$ 10 million), the GCF (with an expected significant initial funding endowment) will allow a single country to accredit a range of institutions and entities from both the public and the private sector, in line with the 'Fit-for-purpose' approach for a vast variety of activities and implementation approaches.

**2) Country ownership:** Based on the findings of the NIE research, it is now important to highlight the critical role the NDA (Nationally Designated Authority) will have in the selection of national and sub-national implementing entities and intermediaries to be accredited. However, the selection of candidates should be based on technical experience, implementation track record in climate-relevant sectors and activity areas under consideration of GCF requirements for fiduciary standards and ESS, and not be politically motivated. Accredited NIEs should also be committed, once accredited, to strive to expand their areas of expertise and the range and scale of their project and programme implementation, so as to better respond to their country's needs. Besides the role of the NDA or the focal point in serving as the liaison for a recipient country's communication with the Board and the Secretariat, and of acting as an authoritative interface that can ensure country ownership of projects and programmes to be funded by the Fund through the implementation of the no-objection procedure, NDAs and focal point in the GCF are providing another important role in domestic country coordination and multi-stakeholder engagement efforts. The GCF Board meeting in Barbados in October 2014 endorsed initial best-practice options and noted that specific guidance on multi-stakeholder engagement in the context of the development of funding proposals is also included and addressed in the Fund's ESS.<sup>18</sup> The NDA should play a pivotal role in coordinating priorities and activities in the country and facilitating convergence towards those priorities in a very consultative manner. Country coordination and multi-stakeholder engagement is relevant at two different but complementary levels: (a) at the level of strategic frameworks, national priorities, plans and strategies; and (b) for the country-owned development of funding proposals.<sup>19</sup> Drawing on the experience from the Adaptation Fund (as described in earlier chapters of this study), the role of NDAs – as seen in the case of Benin – can be catalytic in advancing the country's perception about and engagement level with any fund and play a key role throughout the accreditation process of national and sub-national implementing entities and intermediaries. Although it is at the discretion of the recipient country to decide on the institutional nature of the NDA or the focal point and the level of involvement of multi-stakeholders in country coordination efforts, it is important to institutionalize the role played by the NDA or the focal point regardless of the nature of the ministry or institution they may emanate from. In addition, it is also critical for smooth implementation and achievement of tangible impacts on the ground to have a multi-stakeholder representation in the NDA endowed with the necessary right to influence the process. This is the critical finding of this NIE study: the deeper and more comprehensive and meaningful the consultative process is, the smoother the subsequent implementation processes will be within the countries, as a level of country ownership which extends beyond the government is established as a best national practice at the very beginning of a recipient country's engagement with the respective fund.

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<sup>18</sup> GCF Decision B.08/10.

<sup>19</sup> GCF 2014: Investment Framework, p.5.

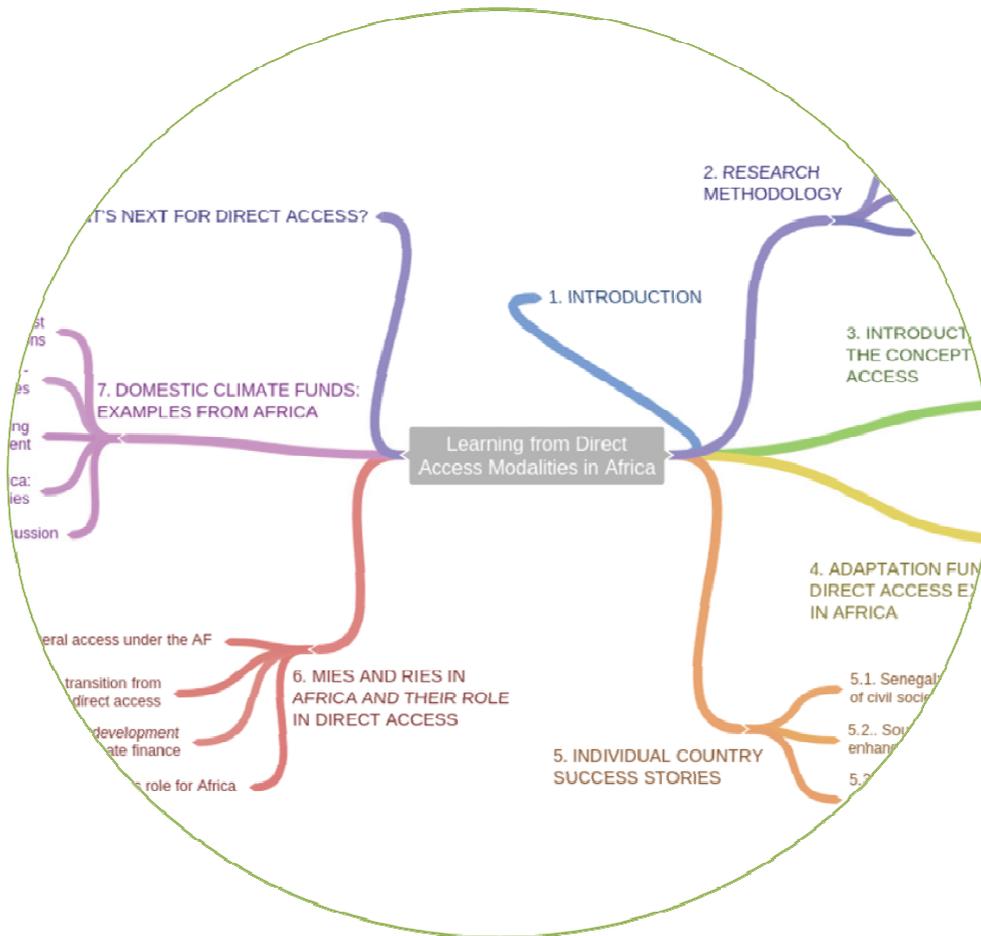
**3) Stakeholder consultation:** The experience from the AF has highlighted the critical importance of consulting all relevant stakeholders in order to ensure sustainability, ownership of the project and implementation by those the project aims to target, particularly vulnerable groups and gender considerations. Consultation of often marginalized vulnerable people, including women, may show appropriate strategies address specific needs and achieve necessary outcomes. Consultation improves the effectiveness and efficiency of project preparation and implementation by preventing timely project adjustment, raising awareness and increasing the participation and involvement of all relevant members of society in the project, sharing experiences and knowledge which often help reduce implementation costs and improving project performance and impact.

While in the GCF, as in the AF, a NDA is in the driver seat to determine which national implementing entity is to be accredited or which project proposals is to be submitted, it is clear from the AF experience that in order to address the broader needs of a country and advance its strategic planning, the engagement of a multitude of stakeholders is required. Such engagement should bring together an inter-ministerial working group with a national committee on climate change, the private sector, and representatives of NGOs and key civil society groups, paying particular attention to the gender-sensitive involvement of women and vulnerable groups, including indigenous peoples.

Although the AF's strategic priority gives special attention to the most vulnerable group and gender, the AFB Secretariat has not developed any specific consultation guidelines. There is also no guidance for ongoing or continuous consultation throughout the project or programme cycle including in the form of participatory monitoring during project or programme implementation. Rather, the AF requests meaningful, inclusive and participative stakeholder consultation only in the context of the formulation of project/programme proposals. In contrast, the GCF Governing Instrument explicitly encourages the role of participatory monitoring involving stakeholders as part of its monitoring and results measurement approach (para. 57). In its best-practice options endorsed at its 8<sup>th</sup> meeting in Barbados, the Board acknowledges this by suggesting that country coordination mechanisms and multi-stakeholder engagement may support the on-going monitoring and evaluation of the Fund's projects and programmes throughout various stages of the project cycle.<sup>20</sup> A further development of the initial proposal approval process in the Fund, particularly with respect to post-approval implementation, should pay particular attention to this aspect of GCF stakeholder input and participation.

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<sup>20</sup> Ibid.



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