

NO-OBJECTION
PROCEDURE FOR THE
NDA TO THE GCF

ST. VINCENT & THE GRENADINES



GREEN
CLIMATE
FUND



Caribbean Community
Climate Change Centre



Deliverable:

The No-Objection Procedure for the NDA to Approve Funding Proposals and PPF Applications

Project:

NDA Toolkit & No-Objection Procedure and the Establishment of a Monitoring, Reporting and Verification System (MRVS) - St. Vincent and the Grenadines

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ACRONYMS

AE	Accredited Entity
CCCCC	Caribbean Community Climate Change Centre
DAE	Direct Access Entity
EMF	Environmental Management Framework
EPD	Economic Planning Division
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Safeguards
GCF	Green Climate Fund
GoSVG	Government of St. Vincent and the Grenadines
IRM	Independent Redress Mechanism
MFEPIIT	Ministry of Finance, Economic Planning, and Information Technology
NESDP	National Economic and Social Development Plan
NAP	National Adaptation Plan
NDA	National Designated Authority
NDC	Nationally Determined Contribution
NTACCC	National Technical Advisory Committee on Climate Change
PPF	Project Preparation Facility
PSIPMU	Public Sector Investment Programme Management Unit
SDU	Sustainable Development Unit
SDG	Sustainable Development Goal
SPCR	Strategic Program for Climate Resilience
UNFCCC	United Nations Framework Convention on Climate Change

GLOSSARY OF TERMS

ACCREDITED ENTITY (AE): An entity that is accredited by the GCF Board in accordance with the Governing Instrument and relevant Board Decisions to act as an intermediary between the GCF and recipient governments in the development and implementation of projects.

CONCEPT NOTE: A document that provides essential information about a project idea to seek feedback on whether the concept is aligned with the objectives, policies and investment criteria of the GCF. The concept note is not mandatory but strongly encouraged to promote early technical dialogue with the GCF Secretariat, engage work with the Project Preparation Facility (PPF) towards the development of a full proposal, and to allow for a faster review process. The concept note template can be downloaded from the GCF website.

COUNTRY PROGRAMME: Countries are requested to develop “Country Programmes” outlining the needs of their country under climate change and how the funding will be used to address these needs, both in terms of mitigation and adaptation. Well-constructed country programmes represent an essential tool at the Fund’s – and countries’ – disposal to achieve transformational impact, while enhancing and ensuring country-driven approaches.

DELIVERY PARTNERS (DP): Institutions selected by the NDA or Focal Point to implement activities approved under the Readiness and Preparatory Support Programme. Readiness Delivery Partners provide services such as: development of readiness request proposals; implementation and supervision; fiduciary management; progress reporting; and project completion and evaluation. Readiness Delivery Partners may be AEs or other institutions that meet the financial management capacities requirements of the GCF. Readiness Delivery Partners that are not AEs must pass the Financial Management Capacity Assessment (FMCA) to be approved for managing Readiness support to countries.

EXECUTING ENTITY (EE): An entity through which accredited entities channel GCF proceeds for the purposes of a funded activity or part thereof; and/or any entity that accredited entities work with to execute, carry out or implement funded activities, or any part thereof. An accredited entity may carry out the functions of an executing entity, though it is preferable if local and national actors execute projects/programmes.

FIDUCIARY STANDARDS: Refers to the basic and specialized fiduciary requirements of the GCF that AEs and Readiness Delivery Partners need to comply with depending on the nature of the activities funded by the GCF.

FOCAL POINT: An individual or authority designated by a developing country party to the United Nations Framework Convention on Climate Change (UNFCCC) to fulfil all functions of a National Designated Authority (NDA) on a temporary basis, until it has designated an NDA.

FUNDING PROPOSAL: A document that is submitted by entities who want to get access to GCF resources for climate change projects and programmes. Full Funding Proposals can be submitted to the GCF at any time or as a response to a Request for Proposals (RFP) issued by the GCF. Funding Proposals that are submitted to GCF are subject to a review process, culminating in a decision by the GCF Board as to whether to approve and finance the project. A no-objection letter from an NDA is required before the GCF will review a funding proposal.

GREEN CLIMATE FUND: The Green Climate Fund (GCF) is a global fund created to support the efforts of developing countries to respond to the challenge of climate change. GCF helps developing countries limit or reduce their greenhouse gas (GHG) emissions and adapt to climate change. It seeks to promote a paradigm shift to low-emission and climate-resilient development, taking into account the needs of nations that are particularly vulnerable to climate change impacts.

NATIONAL DESIGNATED AUTHORITY (NDA): The core interface and main point of communication between a country and the GCF. The NDA seeks to ensure that activities supported by the GCF align with strategic national objectives and priorities, and help advance ambitious action on adaptation and mitigation in line with national needs. Among the various roles and responsibilities of the NDA, a key function is to provide letters of no-objection to accompany project proposal submission and letters of nomination for direct access entities to start their accreditation process.

PROJECT: A set of activities with a collective objective(s) and concrete outcomes and outputs that are narrowly defined in scope, space and time; contributing to the recipient country's priorities, and that are measurable, monitorable and verifiable.

PROJECT PREPARATION FACILITY (PPF): The PPF is a financial support window of the GCF that provides support to Accredited Entities (AEs) in developing and preparing projects and programmes for submission to the GCF. It is especially targeted at supporting direct access entities, and micro-to-small size category projects.

PROGRAMME: A set of interlinked individual sub-projects or phases, unified by an overarching vision, common objectives and contribution to strategic goals, which will deliver sustained climate results and impact in the GCF result areas efficiently, effectively and at scale.

RESULTS MANAGEMENT FRAMEWORK (RMF): A life-cycle approach to results management through measurements to improve decision-making, transparency and accountability. The approach is in line with improving the way the GCF functions by achieving outcomes through implementing performance measurement, learning and adapting, in addition to reporting performance.

REQUEST FOR PROPOSALS (RFPs): On occasion, the GCF Board may call for RfPs to guide the development of the GCF portfolio in specific areas in accordance with the initial strategic plan. RfPs have specific eligibility standards. Entities that are not yet accredited by the GCF can submit proposals to the GCF as a response to RfPs.

SIMPLIFIED APPROVAL PROCESS (SAP): A process for small-scale low risk proposals, which allots less time and effort from both the entity and GCF to go from project conception to implementation.

1. NO-OBJECTION PROCEDURE

1.1. Purpose and Background of the No-Objection Procedure

Formally adopted by the GCF in its Eighth Board Meeting in October 2014, the no-objection procedure is a core element of the funding proposal and approval process. The procedure has two key purposes:

- To ensure that projects and programmes put forward for the Board's approval are consistent with national climate strategies and plans and country-driven approaches; and
- To provide for effective direct and indirect public and private sector financing by the Fund.

[A Letter of No-Objection by the NDA](#) - the result of a successful no-objection procedure - is a mandatory condition for the approval of all funding proposals submitted to the Fund.

Prior to communicating its no-objection for proposals each country, through their NDA, is required to determine its own nationally appropriate process to vet funding proposals. The broad components of a no-objection procedure include an assessment to ensure that the project idea meets the GCF requirements and the GCF investment criteria, has a potential climate rationale, and fits within the country program. This process should be developed in accordance with the country's capacities and existing procedures, regulations, and institutions to ensure a meaningful yet efficient procedure that avoids duplicity and additional burden for already capacity-constrained NDAs. Following this procedure, each funding proposal will also be accompanied by a detailed description of how the country ownership was ensured and, if this process is not satisfactory, the Board has the option to reject it.

The NDA or focal point communicates its no-objection to the GCF Secretariat in conjunction with every submission for approval of a funding proposal by an intermediary or implementing entity. The no-objection letter will be signed by the official representative of the NDA or focal point registered with the Secretariat (see [Annex 2: Template for the Letter of No-Objection for Funding Proposals](#) and [Annex 3: Template for the Letter of No-Objection for the Project Preparation Facility](#)).¹ The letter should be included as an annex to the submitted funding proposal.²

There are three occasions in which a No-Objection from the NDA may be requested:

1. The No-Objection Letter is **required** for the approval of all funding proposals submitted to the Board. In cases where funding proposals are not accompanied by a No-Objection Letter, the funding proposal will not be processed for the Board's consideration until the NDA provides a Letter of No-Objection.

This must be done within 30 days of the GCF Secretariat notifying the NDA of the missing letter, otherwise the proposal will be suspended, and the Secretariat will notify the Accredited Entity (AE) or intermediary of the suspension. This will be based on the assumption that the proposal does not meet the national requirements and therefore does not have the support of the NDA.

2. No-Objection is also **required** for Concept Notes when an application to the Project Preparation Facility (PPF) is submitted. The GCF guidance specifies that the Accredited Entity should make PPF

¹ Decisions of the Eighth Board meeting of the GCF: [GCF/B.08/45](#)

² If a proposal is submitted without a no-objection letter, the GCF Secretariat will notify the NDA of its inability to consider the funding proposal without expression of no-objection. The NDA will then have a maximum of 30 days to provide the Letter of No-Objection, with failure to do so resulting in the suspension of the proposal.

applications after consultation with the relevant NDA. [A Letter of No-Objection for the PPF](#) request should be included in the PPF application.

3. A Letter of No-Objection is **optional** for Concept Notes of full funding proposals that are submitted to the GCF Secretariat for feedback, but the AE must inform the NDA about its submission of a concept note to the GCF. Further to this, it is recommended that, in consultation between the AE and NDA on the concept note, the requirements of the no-objection procedure should be taken into consideration at this stage.

1.2. Importance of the No-Objection Procedure

A high level of importance has been accorded to the No-Objection by GCF Board Decisions and by developing countries in order to ensure that submitted proposals are not only consistent with national climate change strategies and plans, but also have genuine country ownership and stakeholder buy-in. Therefore, a nationally appropriate and meaningful procedure is fundamental in ensuring and promoting ownership and a country-driven approach – the cornerstones of the Fund’s operations.

In 2015, the GCF Board recognized the importance of enhancing the role of the NDA to guarantee country ownership and country-driven processes. This culminated in the Fund adopting guidelines and within that decision, the Board request the GCF Secretariat, AEs, Delivery Partners, and NDAs to follow these guidelines. These guidelines have subsequently been updated through the Board’s [Decision GCF/B.17.14 – Guidelines for Enhanced Country Ownership and Country Drivenness](#), and is consistently highlighted as the defining and differentiating feature of the work of the Fund. In addition, all Parties to the UNFCCC have an obligation to demonstrate progress towards achieving national climate change goals in partnership with key stakeholders. The application of the meaningful procedure should support this process.

Communication of the no-objection to the GCF Secretariat will communicate that the government has no objections to funding proposals; that the submitted proposal demonstrably confirms the country’s national priorities, strategies and plans and relevant national laws and regulations; and that the submitted funding proposal is in accordance with the GCF’s environmental and social safeguards. The no-objection procedure also serves as a mechanism to:

- a. Guarantee genuine country ownership, including through stakeholder participation mechanisms;
- b. Ensure projects are in line with particular calls for proposals;
- c. Validate that the planned outcomes of the projects/programmes support St. Vincent and the Grenadines’ efforts in meeting its commitments and pledges to the UNFCCC and its Paris Agreement;
- d. Maximize synergies with broader development strategies and achievement of the SDGs;
- e. Ensure clarity of communication lines and modalities with the AE throughout the development of the project proposal and its implementation;
- f. Ensure there is no conflict with ongoing projects/programmes, any duplication of efforts, or crowding out of planned or future investments or funding;
- g. Prevent flawed projects/programmes from advancing to the GCF Board for consideration;
- h. Ensure that the project/programme fully incorporates gender into the proposal and provides equal consideration and opportunity to males and females;
- i. Validate that the project/programme has been assessed for potential environmental and social risks, and these risks were shared and discussed among stakeholders to identify an agreed approach to address such risks;

- j. Assure the international community that the project/programme is welcome by their host communities and are of the highest caliber, and do not impose any undue harm or costs upon the host communities and their environment; and
- k. Ensure projects/programmes are consistent with the GCF requirements (including, but not limited to, the GCF Investment Criteria).

1.3. Project Development and Appraisal in St. Vincent and the Grenadines

The NDA has designated the Economic Planning Division (EPD) as the division responsible for project review, as it relates to NDA responsibilities with regard to GCF projects. The officers responsible for the GCF Portfolio within the EPD/PSIPMU will review proposals on an ongoing basis as they are submitted. The Economic Unit within the Ministry of Finance, Economic Planning, and Information Technology (MFEPIT) shall serve as the lead agency for the execution of the procedure, and the coordination of related activities.

The no-objection procedure for the GCF, as outlined in the following sub-sections is built upon the existing frameworks and is designed to leverage the existing processes, capacities and competencies of the MFEPIT, and particularly those of the EPD and PSIPMU.

1.4. No-Objection Procedure for St. Vincent and the Grenadines

The existing modus operandi within the NDA for reviewing climate change projects is largely informal, with projects and programmes developed and appraised on an ad-hoc basis. The Sustainable Development Unit (SDU) currently executes most of the work on national climate change projects. While the National Technical Advisory Committee on Climate Change (NTACCC) — led by the SDU — is proposed as a consolidated entity for all national climate change decision-making and action, the Committee is yet to be operationalized. The NTACCC is envisioned to play a key supporting role in the execution of this No-Objection Procedure. To fulfil the GCF requirements, the procedures below for various approaches to GCF project development and appraisal will be followed.

1.4.1. For Nascent project ideas – Climate Change screening of ideas by AE and NDA:

In a situation where an AE or a project proponent has an early-stage project idea, the following steps should be followed:

STEP 1: COMPLETENESS CHECK BY AE AND/OR PROJECT PROPONENT

The AE and/or project proponent screens its project idea against the climate change priorities of the Government of St. Vincent and the Grenadines (GoSVG), which can be found in relevant documents and policies such as the NESDP, National Climate Change Policy, National Climate Change Strategy and Implementation Plan, NDC, NAP, EMF, SPCR and other relevant policies and documents. The purpose of this exercise will be to ensure that the project idea/concept fits within the priorities of the country and country programme.

The AE and/or project proponent should also identify climate change vulnerabilities that the project addresses, and should complete the checklist found in [Annex 1: Template for the Technical Review of GCF Funding Proposals by the NDA](#) to ensure that the idea:

1. Meets the broad GCF requirements and can address the 6 GCF investment criteria;
2. Has a potential climate rationale; and
3. Fits within the country programme.

In particular, the AE will submit their project concepts in the [GCF Concept Note Template](#) to the NDA. The AE can also review the checklist in [Annex 1: Template for the Technical Review of GCF Funding Proposals by the NDA](#) to ensure that that the relevant GCF requirements have been met.

STEP 2: AE APPROACHES THE NDA FOR DISCUSSION

Once this initial screening and completeness check is done by the AE and/or project proponent, the entity will then approach the NDA via letter to request a discussion on the project idea.

STEP 3: SCREENING OF PROJECT IDEA/CONCEPT BY NDA

Once the NDA receives a request for discussion of the concept/idea from the AE and/or project proponent—alongside all relevant documentation—the NDA will conduct an initial screening of the idea. This is to assist the NDA with identifying the climate change rationale at an early stage of project design, and to enable project developers to further build climate change resilience into their projects from the design stage.

The screening will also aim to confirm that the project idea is in line with the national climate change priorities and development strategies, as well as be informed by the GCF priority result areas and investment criteria. The screening is to be facilitated by the documentation provided by the AE and/or project proponent, which shows that the AE has done its due diligence with regard to the idea potentially meeting the GCF criteria for projects/programmes. Furthermore, the core documents guiding St. Vincent and the Grenadines' climate change activities will be critical at this stage.

Timeline: This initial screening should take no more than 20 business days after receipt of all information.

STEP 4: NDA COMMUNICATION OF SCREENING OUTCOME

Provided that the initial screening of the project is satisfactory, the NDA will communicate such to the AE/project proponent. In the case of a project proponent that is not already an AE and has not identified an appropriate AE, the NDA may recommend an appropriate AE to the project proponent to facilitate further development and refinement of the proposal. If, based on this initial screening, the AE/project proponent wishes to further develop the idea into a concept note or proposal, the entity can submit an official concept note or full funding proposal, which will undergo a full technical review as described below in Sections 1.4.2. and 1.4.3.

If the initial screening of the project does not satisfy the minimum requirements, the NDA will inform the AE/proponent and provide feedback on the areas of the project that need clarification, or on how to improve the project idea, in line with the GCF requirements and investment criteria.

Timeline: The NDA should communicate the results of the screening to the project proponent within 3-5 days of completion of the initial screening.

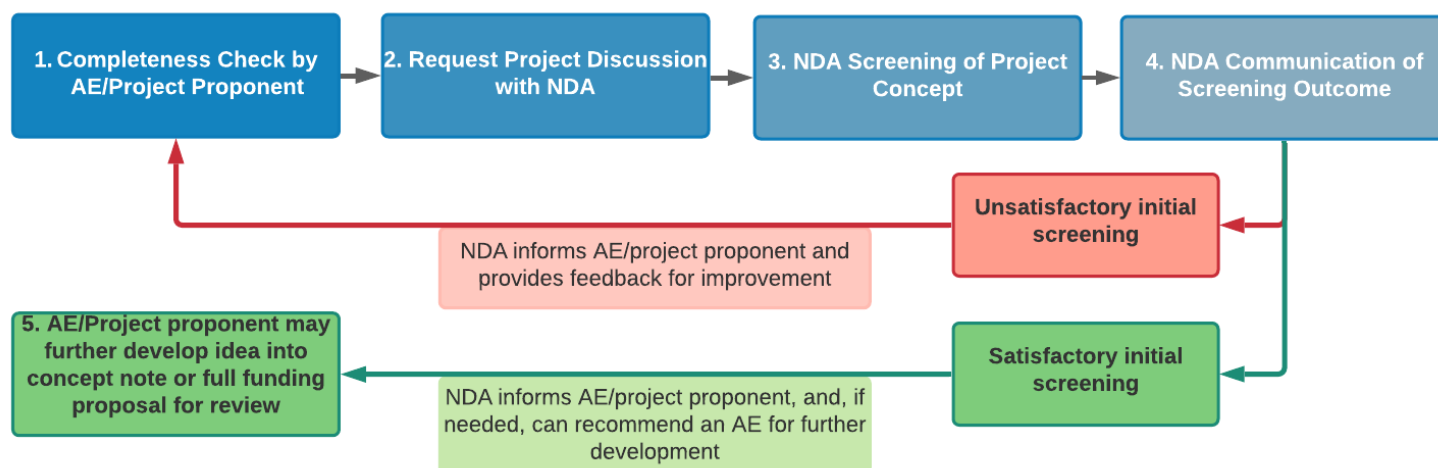


Figure 1: Outline of Process for Nascent Project Ideas (Climate Change Screening of Ideas by AE and NDA)

1.4.2. Concept Note Review Process

The following steps will be utilized to review concept notes:

- If an AE wishes to seek an optional letter of no-objection from the NDA when they are seeking feedback and consultation with the GCF Secretariat; and
- If an AE submits a concept to the PPF for funding.

Completion of the climate change screening of nascent project ideas, as described in Section 1.4.1. is not a pre-requisite for the concept note review process. In other words, an AE can submit a concept note for a no-objection letter from the NDA without having undergone the process in section 1.4.1. However, if the AE has already undergone the climate change screening process, this review below may utilize information presented and discussed during the climate change screening.

STEP 1: COMPLETENESS CHECK (LED BY THE NDA)

AEs who intend to submit a project for funding from the GCF will submit their project concepts in the GCF Concept Note Template to the NDA. The AE will ensure that their concept note meets the requirements of the checklist in [Annex 1: Template for the Technical Review of GCF Funding Proposals by the NDA](#), which confirms that the concept:

1. Meets the GCF requirements and can address the six GCF investment criteria;
2. Has a strong climate rationale; and
3. Fits within the country programme.

This checklist and relevant documentation should be submitted to the NDA alongside the concept note. The NDA will conduct a completeness check to ensure that all information as required by the concept note template is included along with accompanying documentation.

Timeline: The completeness check should take no longer than 5-7 Business Days from the receipt of all information.

STEP 2: TECHNICAL REVIEW (LED BY THE NDA)

Upon completing Step 1 and finding all the required components to be present, the NDA shall send the concept note to the NTACCC to conduct a technical climate change review and evaluation. As the entity responsible for national climate change coordination, the NTACCC is institutionally well-placed to support in the review of GCF projects.

The NTACCC will convene a GCF-specific technical working group to execute the evaluation.³ The NDA shall serve as the Chair of the technical working group, while the SDU will serve as its Secretariat. In terms of membership, the GCF-specific technical working group shall comprise, at the minimum, of:

- A representative from the Ministry of Finance⁴
- A representative from the Economic Planning Division
- At least one representative from the SDU⁵
- A representative from the relevant Government agency responsible for gender
- Representatives from the sector Ministries being targeted or that will benefit from the interventions in the concept note, i.e., Fisheries, Agriculture or Energy
- A representative from civil society
- A representative from the private sector

Depending on the proposal being reviewed, the technical working group shall also have the option to invite additional representatives and/or non-government experts from relevant sectors or thematic issues on an ad hoc basis. The invitation to additional reviewers should be determined at the discretion of the NDA and SDU as the Chair and Secretariat respectively. The existing structure and institutional arrangements should be leveraged to convene the necessary stakeholders.

The GCF-specific technical working group will conduct an initial review of the project concept using the Project Checklist as outlined in [Annex 1: Template for the Technical Review of GCF Funding Proposals by the NDA](#). The review will seek to ensure that:

1. It is consistent with at least one of the GCF Priority Result Areas;
2. It has a clear and strong climate rationale i.e., that the problem that it is responding to has a climate change origin, and that addressing it will contribute to St. Vincent and the Grenadines' response to climate change;
3. It has the potential to meet the GCF investment criteria of Impact Potential and Paradigm Shift Potential;
4. Environmental and Social Safeguards (ESS) are in place; and
5. The impacted stakeholders have been sufficiently consulted.

³ It should be noted that the NTACCC's Terms of Reference do not currently articulate a GCF-specific technical working group. The NTACCC will need to be fully operational for this working group to function, and further development of its precise modalities include its leadership, membership, convening procedures, and the mechanisms through which the EPD and SDU will collaborate to overcome institutional arrangement hurdles.

⁴ In part, this representative's role is to review the proposal in light of the Tenders Board requirements.

⁵ In part, this representative's role is to review the concept note or funding proposal in relation to national climate change frameworks, strategies and priorities.

Timeline: The review of the concept note by the NDA should take no more than 30 Business Days from the receipt of all information.

STEP 3: NDA DECISION (LED BY NDA)

Upon completion of Step 2, the outcome of the technical review and recommended decision (based upon the Appraisal Criteria for the Evaluation of GCF Concept Notes) is submitted to the NDA by the GCF-specific NTACCC technical working group, alongside any relevant accompanying documents. The NDA will take a decision on whether to issue a Letter of No-Objection based upon the recommendation from the technical review.

Timeline: The GCF-specific technical working group should submit the outcome of the technical review (Step 2) to the NDA focal point within 1-3 Business Days from the review being completed.

STEP 4: NOTICE OF APPROVAL OR REJECTION (LED BY NDA)

If, at the completion of the review of the Concept Note by the NDA and NTACCC, the NDA finds the concept note successful, it will clear the project for development into a full project proposal or submission to the PPF. The NDA will notify the AE accordingly.

If a concept note is rejected, the NDA will notify the AE, and can share the project evaluation checklist at their discretion.

Concepts that are approved by the NDA may be issued a Letter of No-Objection by the NDA for submission to the GCF Secretariat. The no-objection letter may also be shared with the AE for their records, and is also usually attached as an annex to the submission. However, the Concept Note is addressed to the GCF.

[Annex 2: Template for the Letter of No-Objection for Funding Proposals](#) contains templates for the Letter of No Objection for the Concept Note to be submitted by the NDA to the Project Preparation Facility and GCF Secretariat.

Timeline: The NDA should notify the AE of the outcome no more than 3-5 Business Days after arriving at the decision on the outcome.

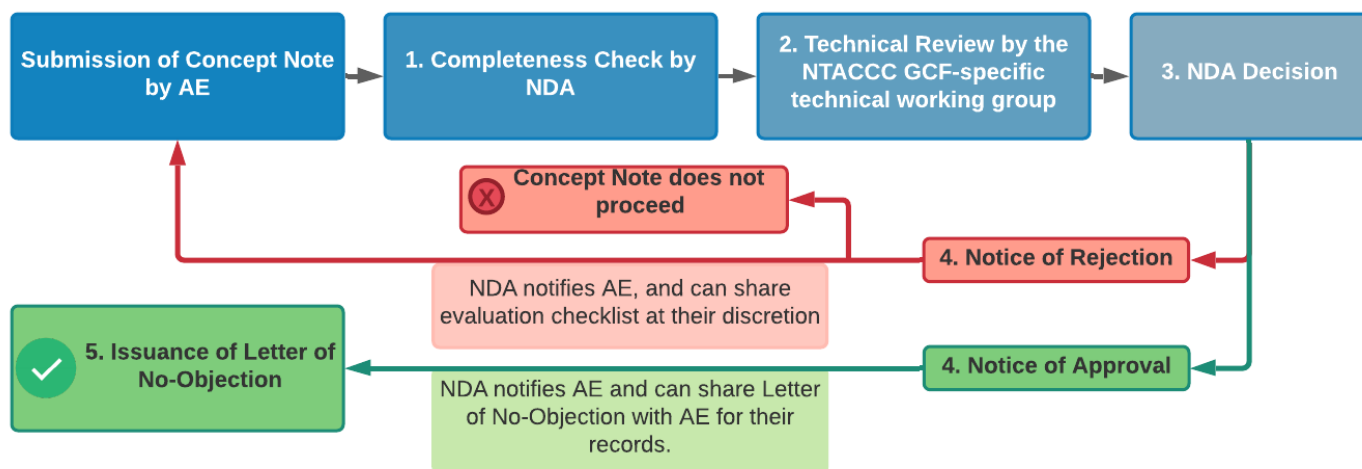


Figure 2: Outline of Process for Concept Note (for optional Letter of No-Objection, or PPF Funding Concept)

1.4.3. Full Funding Proposal Stage

For full funding proposals for projects and programmes, the NDA will follow similar procedures to those for a Concept Note (see Section 1.4.2.) to support the assessment of whether the NDA should provide the AE with a Letter of No-Objection for the funding proposal. The analysis will assess the extent to which the proposals and implementation arrangements meet the requirements set by the GCF.

While the concept note requires a certain level of detail with regards to how the project/programme aligns with the GCF investment criteria, climate rationale, and how the project fits with the country programme and country priorities, a full funding proposal requires much more detail and several supporting documents. The checklist found in [Annex 1: Template for the Technical Review of GCF Funding Proposals by the NDA](#) should be utilized by the AE and NDA respectively to evaluate the completeness of proposals, while following the steps outlined in Section 1.4.2. above.

Satisfaction of the relevant criteria assessed by the NDA will result in a decision to accept the proposal and to issue a Letter of No-Objection. The NDA will then formally notify the AE of the decision taken, and issue a Letter of No-Objection.

[Annex 3: Template for the Letter of No-Objection for the Project Preparation Facility](#) contains a template for the Letter of No-Objection for the Funding Proposal to be submitted by the NDA to the GCF Secretariat. Like the no-objection procedure for a Concept Note, the letter may be shared with the AE for their records, and is attached as an annex to the funding proposal submission.

In the case of a multi-country project, e. g., a regional project, the above procedures apply. A funding proposal submitted to the GCF for a multi-country project requires a no-objection letter from each of the countries to be included as an annex to the proposal. This means that all the AEs must ensure that stakeholders from all countries in the project are consulted throughout project concept and design, and that the project fits with the country programmes of each of the countries involved. The procedures for granting a Letter of No-Objection, however, remain the same.

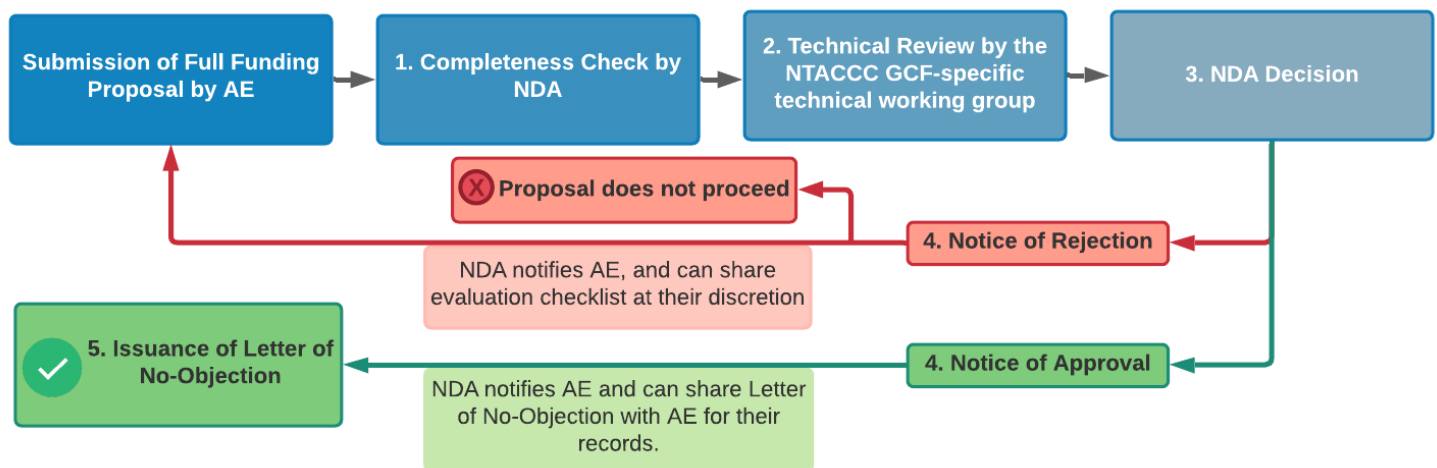


Figure 3: Outline of Process for Full Funding Proposals

1.5. Transparency and Publication of the No-Objection Procedure

To maximize the efficiency of the No-Objection Procedure, it is essential for AEs and project proponents to be familiar with the key processes, components, and requirements for attaining a letter of no-objection. Doing so will facilitate smoother screening and review processes, while also reducing the likelihood of GCF-incompatible proposals being put forward to the NDA.

In particular, the national criteria for assessing a project should be made publicly available. This entails information on national documents, gender-related considerations, and the final authority – the NDA – that would grant a no-objection letter. The key components and process for obtaining the no-objection letter and relevant templates should be made public, but screening components and actual project ideas and checklists should remain as internal information.

The NDA should determine the communication modalities through which such information can best be published and accessed. This can include publishing the information on a website, routinely convening relevant stakeholders to raise awareness of such procedures, or simply providing the resources upon request.

1.6. Implications of the No-Objection Procedure for St. Vincent and the Grenadines

The importance of the no-objection procedure, and the role of the NDA in it, cannot be understated; it confirms that the NDA has completed its due diligence—technical, financial, and legal—to ensure country ownership and stakeholder buy-in for a project/programme. The procedure requires technical input, substantial coordination, oversight, and management. The NDA should not sign the Letter of No-Objection unless the full procedure has been completed, documented, and all relevant documents are completed and accompany the request. The implementation of the national no-objection procedure requires the NDA to have technical, human, and financial capacity to manage and provide oversight of the process that results in genuine ownership, or a position to co-opt this expertise.

THE LETTER OF NO-OBJECTION CONFIRMS THAT:

- a. The GoSVG and all relevant stakeholders endorse the project in concept and design, and in doing so, confirm that the project reflects national development priorities anchored in the NESDP and other guiding policies and documents;
- b. For public sector DAEs, on behalf of the GoSVG, the MFEPIT – as the Ministry in which the EPD is housed— will be responsible for any financial risks or otherwise inherent in the proposal and any liability resulting thereon;
- c. The no-objection letter implies that St. Vincent and the Grenadines has accepted all obligations, including relevant support and all other obligations that may stem from the overarching relationship with the GCF;
- d. The Letter of No-Objection implies that St. Vincent and the Grenadines is committed to implementing the project as designed, and can be held accountable for any issues that may arise during the implementation of the project or programme;
- e. For public sector Direct Access Entities (DAEs), if any legal challenges arise from any project approved and provided with a letter of no-objection from the NDA, the GoSVG will take on responsibility and act on behalf of the project/programme; and
- f. The project/programme contributes towards achieving St. Vincent and the Grenadines' obligations under the UNFCCC and the Paris Agreement.

LEGAL IMPLICATIONS: The no-objection procedure and resulting signed letter have two main legal implications:

1. **Legal implications for the NDA:** The NDA should put in place—or adapt existing—procedures and arrangements to address potential complaints from relevant stakeholders and appeals of decisions of the NDA on granting or withholding a no-objection letter. For persons who wish to share issues regarding the environmental and social safeguards, ahead of providing a no-objection letter, they may contact the NDA at:
Ministry of Finance, Economic Planning, and Information Technology
1-784-457-1746
cenplan@svgcpd.com
1st Floor Administrative Building Bay Street, Kingstown St. Vincent and the Grenadines
2. **Legal implications for other stakeholders:** The no-objection procedure is mandated to include stakeholder consultations. The feedback from these consultations should feed into the decision of the NDA regarding the Letter of No-Objection. If, however, any person or a group of persons, or a community has been, or may be affected negatively by a GCF project or programme (including those being actively considered for funding by the GCF), they may file a complaint through the GCF's Independent Redress Mechanism (IRM).

The affected person(s) can authorize their government or representative to file and pursue the complaint on their behalf. Further information on this can be found at the IRM's website: <https://irm.greenclimate.fund/case-register/file-complaint>

TECHNICAL IMPLICATIONS: While there is an importance placed on efficiency and mainstreaming of procedures, to ensure the baseline requirements are met, sufficient time is required to allow for substantive consultations and additional technical, legal, or financial reviews, if necessary. It is very important that the NDA—or the bodies that will be conducting the technical review of the proposals—have the full technical capacity and knowledge to evaluate proposals within a variety of sectors, and across both mitigation and adaptation themes. If the technical capacity is not available, then the review bodies will require the ability to co-opt this expertise on an as-needed basis to ensure a comprehensive review is conducted.

FINANCIAL AND CAPACITY IMPLICATIONS: The coordination of the process, ensuring the technical, legal, and financial review, and the convening of consultations required, will have budgetary implications on top of the capacity required to manage this process. This will need to be taken into consideration by the NDA, and incorporated into budget proposals

2. ANNEXES

2.1. Annex 1: Template for the Technical Review of GCF Funding Proposals by the NDA

Completeness Check and Project Evaluation Sheet for the Technical Review by the National Designated Authority of GCF Concept Notes and Funding Proposals

2.1.1. Completeness Check

The following documents are required to initiate the review process for the issuance of a Letter of No-Objection. Have they been submitted along with the proposal?

General:

- A letter of request from the official representative of the AE for a letter of no-objection for the project/programme signed by the focal point for the AE.
- A full project proposal in GCF template with all sections completed
- Letters of support from relevant stakeholder groups (*optional*)

Concept Note⁶: *Optional* supporting documents to be attached to the submission of the concept note:

- Map indicating the location of the project/programme
- Diagram of the theory of change
- Economic and financial model with key assumptions and potential stressed scenarios
- Pre-feasibility study
- Evaluation report of previous project
- Results of environmental and social risk screening

Full Proposal⁷: Supporting documents *required* by the GCF to be attached to the submission of a full project proposal:

- Feasibility study - and a market study, *if applicable*
- Economic and/or financial analyses in spreadsheet format
- Detailed budget plan ([template provided](#))
- Implementation timetable including key project/programme milestones (template provided)
- Environmental & Social document corresponding to the E&S category (A, B or C; or I1, I2 or I3): ([ESS disclosure form provided](#))
 - Environmental and Social Impact Assessment (ESIA) or Environmental and Social Management Plan (ESMP) or Environmental and Social Management System (ESMS)
 - Others e.g., Resettlement Action Plan, Resettlement Policy Framework, Land Acquisition Plan etc.
- Summary of consultations and stakeholder engagement plan
- Gender assessment and project/programme-level action plan ([template provided](#))
- Legal Due Diligence (Regulation, Taxation and Insurance)
- Procurement plan ([template provided](#))
- Monitoring and evaluation plan ([template provided](#))
- AE fee request ([template provided](#))
- Co-financing commitment letter, if applicable ([template provided](#))
- Term sheet including a detailed disbursement schedule and, if applicable, repayment schedule

⁶ All of the supporting documents for the submission of a Concept Note are optional. This list may vary in the case of a Simplified Approval Process (SAP).

⁷ This list may vary in the case of a Simplified Approval Process (SAP).

Full Proposal⁸: Supporting documents **as applicable** to be attached to the submission of a full project proposal:

- Evidence of Internal Approval ([template provided](#))
- Map(s) indicating the location of proposed interventions
- Multi-country project/programme information ([template provided](#))
- Appraisal, due diligence or evaluation report for proposals based on up-scaling or replicating a pilot project
- Procedures for controlling procurement by third parties or executing entities undertaking projects financed by the entity
- First level AML/CFT (KYC) assessment
- Operations manual (Operations and maintenance)

2.1.2. Project Evaluation Checklist

GENERAL INFORMATION	
1.0 Full Name of Project (Acronym)	
2.0 Name of Accredited Entity	
3.0 Name of Executing Entity	
4.0 Focal area	<input type="checkbox"/> Adaptation <input type="checkbox"/> Mitigation <input type="checkbox"/> Cross-cutting
5.0 Does the project fall within the pipeline and priorities outlined in SVG's GCF Country Programme?	<input type="checkbox"/> NO <input type="checkbox"/> PARTIALLY <input type="checkbox"/> YES Comment:
6.0 Is the proposal compatible with the objectives of the Paris Agreement and SVG's climate change objectives?	<input type="checkbox"/> NO <input type="checkbox"/> PARTIALLY <input type="checkbox"/> YES Supports: <ul style="list-style-type: none"> • National Climate Change policy • NDC • NAP • Goal 4 of NESDP - climate resilience • Other:
PROJECT DESIGN	
7.0 Has there been stakeholder participation? What were the strategies and methods used to engage stakeholders? Proof of this is required.	<input type="checkbox"/> NO <input type="checkbox"/> PARTIALLY <input type="checkbox"/> YES Comment:
8.0 Does the project provide a strong climate rationale?	<input type="checkbox"/> NO <input type="checkbox"/> PARTIALLY

⁸ This list may vary in the case of a Simplified Approval Process (SAP).

<p><i>This includes: details on climate change scenarios based on the most up to date and available national climate change data; and adequately take into account climate change consideration.</i></p>	<p>() YES Comment:</p>	
GCF INVESTMENT CRITERIA		
<p>9.0 Impact potential (Does the proposal support a shift to low-emission climate resilient development? How was it calculated?)</p>	<p>Mitigation</p>	<p>Adaptation</p>
	<ul style="list-style-type: none"> • Low-emission energy access and power generation 	<ul style="list-style-type: none"> • Enhanced livelihoods of the most vulnerable people, communities, and regions
	<ul style="list-style-type: none"> • Low-emission transport 	<ul style="list-style-type: none"> • Increased health and well-being, and food and water security
	<ul style="list-style-type: none"> • Energy efficient buildings, cities and industries 	<ul style="list-style-type: none"> • Resilient infrastructure and built environment to climate change threats
	<ul style="list-style-type: none"> • Sustainable land use and forest management <p>Comment:</p>	<ul style="list-style-type: none"> • Resilient Ecosystems
<p>10.0 Paradigm Shift (Does it provide a theory of change? Is it designed to ensure the project impacts will be sustained after financial support?)</p>		
<p>11.0 Sustainable Development Potential (Does it maximise synergies with broader development strategies and achievement of the SDGs?)</p>		
<p>12.0 Needs of the recipient (Is the proposal addressing vulnerable groups and addressing barriers to financing?)</p>		
<p>13.0 Country ownership (Is the project aligned with national priorities? Will the planned outcomes of the proposal support SVG's efforts in meeting its climate change goals as outlined in the NDC, NAP and National Climate Change Policy?)</p>		
<p>14.0 Effectiveness and Efficiency (Is it value for money, is co-financing secured upfront?)</p>		
<p>15.0 Does the proposal conflict with ongoing projects and programmes?</p>	<p>() NO () PARTIALLY () YES Comment:</p>	
<p>16.0 Does the proposal duplicate efforts of an already-existing project or programme?</p>	<p>() NO () PARTIALLY () YES Comment:</p>	
PROJECT FINANCING		

17.0 Total project financing				
18.0 GCF contribution	Grant	Loans	Equity	Other
19.0 Co-financing (if any, please list contributors)				
20.0 Is co-financing new and additional	() NO () YES	If no, then this is not allowed. No parallel financing may be included.		
ACCREDITED ENTITY				
21.0 What is the status of the Accredited Entity?	() Basic Fiduciary () Project management () On-granting () On-lending			
22.0 Is the proposal aligned to the Accredited Entity's capability? <i>This includes: size, focus area and project experience. If not, the entity should collaborate with another entity that fits the appropriate role.)</i>	() NO () PARTIALLY () YES Comment:			
OTHER				
23.0 Are there any exceptional circumstances which would make it important to fund the project? What is the rationale for GCF involvement?	() NO () PARTIALLY () YES Comment:			
ENVIRONMENTAL AND SOCIAL SAFEGUARD				
24.0 Has the proposal assessed potential environmental and social risks? Please describe in detail the methods used to assess the potential risks and how those risks will be mitigated.	() NO () PARTIALLY () YES Comment:			
25.0 Have these risks been shared and discussed among stakeholders to identify an agreed approach to address such risks? Please provide as much detail as possible	() NO () PARTIALLY () YES Comment:			
GENDER				
26.0 Does the proposal fully incorporate gender considerations into outcomes and indicators and provide equal consideration and opportunity to males and females?	() NO () PARTIALLY () YES Comment:			

DECISION & RECOMMENDATIONS

<ul style="list-style-type: none"> The NDA approves the project with no-objection. 	[Please provide a short explanation of the decision made.]
<ul style="list-style-type: none"> The NDA will approve and provide no-objection letter once conditions are met. 	[Please provide a short explanation of the decision made.]
<ul style="list-style-type: none"> Rejected. The NDA objects to the projects and requests a number of changes. 	[Please provide a short explanation of the decision made.]

Additional Comments:

Date:

[SIGNATURE BLOCK OF NDA]

2.2. Annex 2: Template for the Letter of No-Objection for Funding Proposals

[Letterhead of the Government of St. Vincent and the Grenadines]

Executive Director
The Green Climate Fund ("GCF")
G-Tower, 24-4 Songdo-dong, Yeonsu-gu
Incheon City, Republic of Korea

[Place], [Date]

Re: Letter of No-Objection for funding proposal for the GCF by [name Accredited Entity] regarding [name project/programme]

Dear Executive Director,

We refer to the project [or programme] [name project [or programme]] in St. Vincent and the Grenadines as included in the funding proposal submitted by [name Accredited Entity] to us on [date].

The undersigned is the duly authorized representative of the Ministry of Finance, Economic Planning and Information Technology, the National Designated Authority of St. Vincent and the Grenadines.

Pursuant to GCF decisions B.08/10, the content of which we acknowledge to have reviewed, we hereby communicate our no-objection to the project [or programme] as included in the funding proposal.

By communicating our no-objection, it is implied that:

- The Government of St. Vincent and the Grenadines has no-objection to the project [or programme] as included in the funding proposal;
- The project [or programme] as included in the funding proposal is in conformity with St. Vincent and the Grenadines' national priorities, strategies and plans; and
- In accordance with the GCF's environmental and social safeguards, the project [or programme] as included in the funding proposal is in conformity with relevant national laws and regulations.

We also confirm that our national process for ascertaining no-objection to the project [or programme] has been duly followed.

We acknowledge that this letter will be made publicly available on the GCF website.

Kind regards,
[SIGNATURE BLOCK OF NDA]

2.3. Annex 3: Template for the Letter of No-Objection for the Project Preparation Facility

[Letterhead of the Government of St. Vincent and the Grenadines]

Executive Director
The Green Climate Fund (“GCF”)
G-Tower, 24-4 Songdo-dong, Yeonsu-gu
Incheon City, Republic of Korea

[Place], [Date]

Re: Proposal for the GCF Project Preparation Facility by [name Accredited Entity] regarding [name of PPF Proposal]

Dear Executive Director,

We refer to the Project Preparation Facility Proposal [name of PPF proposal] for preparation of [Description of underlying project of programme] in St. Vincent and the Grenadines as included in the PPF proposal submitted by [name Accredited Entity] to us on [date].

The undersigned is the duly authorized representative of the Ministry of Finance, Economic Planning and Information Technology, the National Designated Authority of St. Vincent and the Grenadines.

Pursuant to GCF decisions B.08/10 and B.13/21, the content of which we acknowledge to have reviewed, we hereby communicate our no-objection to the Project Preparation Facility activities as included in the PPF Proposal.

By communicating our no-objection, it is implied that:

- The Government of St. Vincent and the Grenadines has no-objection to the Project Preparation Facility request as included in the PPF Proposal;
- The PPF Proposal is in conformity with St. Vincent and the Grenadines’ national priorities, strategies and plans; and
- In accordance with the GCF’s environmental and social safeguards, the PPF activities as included in the PPF Proposal is in conformity with relevant national laws and regulations.

We also confirm that our national process for ascertaining no-objection to the PPF Proposal has been duly followed.

We acknowledge that this letter will be made publicly available on the GCF website.

Kind regards,
[SIGNATURE BLOCK OF NDA]