Climate Governance Integrity: A Handbook for Getting Started

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© Cover photo: A tribal girl and a goat walk over a parched paddy field on the outskirts of Malwa, India. The drought, considered to be man-made, has led to both hope and a sense of frustration on the part of locals. Protests advocating for drought aid have brought some attention to the dire situation in some villages, and have also prompted steps to divert water use by non-essential industries to necessary uses, such as drinking water. However, there is still a sense of helplessness as the government and state leaders fail to disentangle themselves from corrupt deals relating to water and land rights, giving preference to larger companies, and ultimately failing to recognise the struggle of farmers and local villagers living with the drought conditions every day. On a global scale, as extreme weather patterns continue to cause instability a more collective effort will be needed to effectively address both the causes and the consequences of climate change. (2015). Photo by David Rengel, from "Capture Corruption", a global photo competition, which sought to collect the most powerful images of corruption and its devastating impact on lives around the world.

Every effort has been made to verify the accuracy of the information contained in this handbook.

All information was believed to be correct as at July 2015. Nevertheless, the Transparency International Secretariat cannot accept responsibility for the consequences of the use of this information for other purposes or in other contexts. The case studies presented in this handbook reflect circumstances in the past. It is possible that policies have changed with the passing of time.

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1. INTRODUCTION

The global response to climate change will demand innovative international cooperation, profound economic transformation and resource transfers on a significant scale. In this context, early analyses in the Global Corruption Report on Climate Change (2011) showed that corrupt interests in new and existing climate finance institutions, laws and policies, could exploit grey areas and loopholes.

These corruption risks, together with complex and relatively untested funding mechanisms, make it challenging but necessary for civil society groups to effectively engage with, monitor and influence climate finance, to guarantee that the money is spent fairly. In response to these challenges, Transparency International established its climate governance integrity area of work in 2011. The overall goal of this work is to ensure that public money for climate change actions achieves its intended environmental and social benefits. This work has been evaluated and recommendations are already being implemented.

The aim of this handbook is to assist the broader Transparency International movement and other civil society groups, which may want to engage in making a contribution to, and ensuring, good climate finance governance. It provides relevant information about climate governance, and aims to raise awareness about the needs for improved transparency, accountability and integrity in climate finance, as well as some of the corresponding tools for doing this. It sums up experiences and lessons gained through Transparency International’s global and national climate governance integrity work over the past years. The handbook includes a range of case studies from our chapters in Kenya, Mexico, Peru, Bangladesh, the Maldives and Papua New Guinea to present strategies and best practices for civil society groups seeking to prevent corruption.

Introductory video – Global Corruption Report: Climate Change
2. THE IMPORTANCE OF CLIMATE FINANCE

As the magnitude of the harm that will be caused by climate change becomes clearer, and as scientific evidence underlines the urgent need to take action, climate finance has now become one of the greatest governance challenges in the modern world. In this context, leaders of developed countries have pledged to deliver up to US$100 billion in climate finance per year by 2020, and more than US$30 billion in public funding has been spent on climate change adaptation and mitigation projects in developing countries since 2010. While the numbers speak for themselves, efforts to expedite investment in climate change defences have led to a burgeoning of new bodies tasked with channelling, allocating and spending climate finance. These bodies now take their place alongside older institutional architectures. The scale of investment that is required to tackle climate change will also generate new hybrids of public–private financing models, inevitably resulting in an accountability trade-off: there is a risk that corporate secrecy will trump state requirements regarding accountability. Therefore, an increasingly complex and fragmentary funding landscape will complicate efforts to track financial flows, and to ascertain who should be held accountable for decisions and results.

The main elements of corruption risks in climate finance are nicely summarised in this short discussion between Transparency International Managing Director Cobus de Swardt and Kumi Naidoo, Executive Director of Greenpeace.

In this video our chapters that have been working on climate governance integrity over the last couple of years present the main arguments regarding why it is important to tackle corruption and climate change.
By promoting transparency, accountability and integrity in climate finance governance, globally and nationally, corrupt behaviour can be prevented and social as well as environmental rights/interests can be protected. If we consider the scale of climate change and the huge and growing volume of climate finance the urgent need to strengthen climate finance channels against corruption become clear. However, based on the evidence contained in our Corruption Perceptions Index it is evident that countries that are recipients of climate finance face significant corruption challenges. In this context, more than 72 per cent of international public climate finance from multilateral funds has been channelled to mitigation and REDD+ (Reducing Emissions from Deforestation
and Forest Degradation) activities, totalling US$5.46 billion between 2003 and September 2014. The current top five recipients of mitigation finance are Morocco, Mexico, South Africa, India and Indonesia; for REDD+ the top five are Brazil, Democratic Republic of the Congo (DRC), Costa Rica, Mexico and Burkina Faso. These countries scored between 22 and 44 in our 2014 Corruption Perceptions Index (where 0 means a country is perceived as highly corrupt and 100 that it is very clean). Only two – Brazil and South Africa – scored above 40.

On the national level, climate finance will be destined for sectors – such as forestry, construction, public works, utilities and power generation – that are globally some of the most susceptible to shadow practices like bribery or bid rigging (see our GLOBAL CORRUPTION BAROMETER for your country). In this context, major governance and corruption challenges associated with climate finance, as well as complex and relatively untested funding mechanisms, make it challenging but necessary to stop corruption before it starts.

Transparency International started working on climate governance in response to these corruption risks, to enhance transparency, accountability and integrity in climate finance at all levels: from global to national, and from policy choices to project implementation. In this way, it is hoped that systems and processes will be strengthened and opportunities for corruption greatly reduced.

To bring about this kind of effective and sustainable change requires both a clear identification of the required changes and widespread public and stakeholder support for implementing those changes. In countries that are recipients of climate finance, our chapters work to monitor the use of climate funds within their countries, engage and increase public understanding, and ensure that appropriate institutional and legal frameworks exist. They do this through targeted research, using data and information from citizens’ complaints and project monitoring activities, and engaging stakeholders in problem and solution identification.

In this context, Transparency International chapters have been monitoring climate finance as it enters and is distributed throughout their countries. Where they detect a risk that mismanagement or corruption might occur, they call for necessary reforms. In addition, these chapters work together with communities to help ensure that their voices are heard when decisions are made that could seriously impact their futures.

Our work on the issue of climate governance continues to seek to build widespread support for the needed changes through open engagement with a wide range of private sector and civil society stakeholders. Our chapters engage with their governments as well as international institutions, to ensure that they are supporting transparency and accountability measures within climate finance.

MORE INFORMATION ABOUT OUR WORK ON CLIMATE GOVERNANCE HERE.
TRANSPARENCY INTERNATIONAL CHAPTERS ARE WORKING ON CLIMATE GOVERNANCE IN THE FOLLOWING COUNTRIES

AFRICA
Kenya, Cameroon, Ghana, Zambia, Zimbabwe, and (through our contact points) DRC and Republic of Congo.

ASIA
Bangladesh, Maldives, Indonesia, Papua New Guinea, Vietnam.

LATIN AMERICA
Mexico, Peru.

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To start working on climate governance integrity and to understand the need for improved transparency, accountability and integrity, acquiring some basic knowledge on the issue is helpful. Therefore, the handbook starts with an overview of relevant online resources, databases on climate finance flows, existing initiatives and relevant reports.
3.1 E-LEARNING

As a first step, one way to establish a solid foundation on the issue is Transparency International’s e-learning platform relating to the governance of climate funding. On this platform free courses on related topics are available in English, French and (partly) Spanish. We developed these courses in light of the fast pace of developments in climate finance governance and the emerging risks of corruption. These online courses allow participants to gain a better understanding of the topic, and learn about the risks of, and solutions to, corruption. One course is dedicated to the REDD+ initiative. The courses take approximately 12 hours to complete and participants receive a certificate for each course completed.

Upon course completion, participants will be able to:

- explain why there is a need for a greater focus on ensuring that climate finance is spent effectively
- understand key climate finance terms, institutions, funds and distribution channels
- explain the main elements of good governance, corruption and how these may play a role in reducing the effectiveness of climate finance
- select from a range of possible solutions to tackle corruption
- identify the main national challenges to ensuring good governance in climate finance
- explain the main corruption challenges for REDD+ and how these may play a role in reducing the effectiveness of REDD+ efforts
- understand the scope of actions already undertaken to protect REDD+ from corruption
- identify possible measures to tackle corruption in REDD+ and the role they can play in these

For further guidance, numerous materials are provided in the complementary resources section of the e-learning platform. These can be of use on a day-to-day basis.

FIND HERE THE LINK TO THE E-LEARNING PLATFORM
3.2 RESOURCES

A number of databases and organisations collect and present information on climate finance, climate governance and on REDD+. As noted earlier, our e-learning platform offers comprehensive additional resource sections where you can access further information to develop your capacity on this topic and to gain a better understanding of how you might want to engage. Additionally, there is a selection of useful additional online information, databases and publications in Annex I of this handbook.
4
MEASURING CORRUPTION RISKS IN CLIMATE GOVERNANCE

Since 2011 Transparency International’s Secretariat and our chapters working on climate governance integrity have undertaken a variety of actions to work towards their goal of preventing corruption in climate finance. Methodologies that have been used have included:

(1) research-based activities, to get to grips with the specific challenges in their countries and to form a foundation for their advocacy
(2) monitoring activities, to gather real life on-the-ground experience of the challenges that are being faced on a day-to-day basis
(3) advocacy activities to put pressure on decision-makers to implement much needed reforms and capacity building
(4) outreach to build up a network of like-minded and knowledgeable individuals and organisations that stand with us in our work to make climate finance clean.

Some examples of what Transparency International has done in terms of each methodology are further outlined below.

Before starting with the practical part of the handbook we want to provide some insights regarding the biggest challenges that chapters experienced when they first started working on the issue. Below you can find a video in which our Maldives, Cameroon and Zimbabwe chapters talk about the major challenges they have faced.
In order to start to work on the issue of climate governance, it is necessary to acquire an overview of the main actors. If this is not yet available in your country, this toolkit can help you to identify, describe and prioritise the governance risks within key national entities engaged in channelling, managing, delivering or overseeing climate finance. The toolkit provides a generic methodology for exploring both the remedial and preventative measures in place to safeguard climate finance against corruption.

1. CLIMATE FINANCE MAPPING

As a first step, the climate finance mapping addresses three key aspects of climate finance at the national level:

1. Who are the actors involved in dealing with climate finance at the national level and what are their roles?
2. What are the relationships between these actors and what bodies are responsible for anti-corruption oversight?
3. What is the flow of finance between actors?

This methodology recognises the significant scale of climate finance flows, the complicated nature of climate finance management at the national level and the urgent need to ensure the effective use of these funds to mitigate and adapt to the damaging effects of climate change in countries. We have developed this mapping tool in order to provide a clearer view of the actors in the climate finance landscape at the national level.

The completed map has been useful to help climate and anti-corruption stakeholders in countries under review to understand the roles and accountability arrangements for public, private and civil society actors receiving, coordinating, implementing and overseeing climate finance. By identifying the actors responsible for the greatest percentage of climate finance in the country and those that have been subject to corruption-related concerns in the past, the mapping also facilitates prioritisation regarding which actors need to be investigated at the second step of the process (the governance assessment) through a deeper analysis of the safeguards they have in place that could act as barriers against corruption.
2. INSTITUTIONAL ASSESSMENT

As a second step, an institutional assessment of key actors is compiled against a set of indicators under four criteria (transparency, accountability, anti-corruption and capacity). This process involves desk research of secondary sources (websites, commentaries, policies, procedures and decisions, minutes or summaries of meetings, evaluations) combined with a multi-stakeholder approach which, depending on the country, could consist of multi-stakeholders workshops, focus group discussions, questionnaires and interviews with experts from civil society, donors and watchdogs.

You can find the Governance Risk Assessment Toolkit HERE.

COUNTRY REPORTS

Six of our chapters (Mexico, Bangladesh, Kenya, Maldives, Dominican Republic and Peru) have assessed the climate finance landscape in their countries, and they have offered recommendations to ensure that these vital funds achieve their aims and are not lost to corruption. In ANNEX II:) you can find summaries of the main findings from each of the countries assessed.

Links to the full report for further information can be found HERE.

Case study 2:
TI Bangladesh: National research to assess climate finance governance

As a starting point for its climate governance integrity work in Bangladesh, the chapter undertook a number of research studies, to better understand the national climate governance landscape, assess the governance of key climate fund actors, examine funding flows, as well as the quality of climate fund utilisation in Bangladesh. A case study of TI Bangladesh’s experience during its research of analysing the national climate finance architecture and funding flows, based on the methodology of the Governance Risk Assessment Toolkit, is given below.

The initial research methodology, “National Climate Finance: A Governance Risk Assessment Toolkit” was developed by Transparency International and involves a two-step process. Through the first step of the research, TI Bangladesh developed a national Climate Finance Governance (CFG) Map. This mapping exercise examined three key aspects of climate finance at the national level: (1) the actors involved in climate finance at the national level and their respective roles; (2) the relationship between climate finance actors and the duties of integrity oversight institutions; and (3) the financial flows between climate finance actors. The second step involved a governance assessment of the key actors who are primarily responsible for managing the bulk of the climate finance in the country. This methodology assessed the governance of key climate finance actors (both the government and NGOs) in terms of transparency, accountability, integrity and capacity. TI Bangladesh selected for this analysis the Bangladesh Climate Change Trust Fund (BCCTF) and the Bangladesh Climate Change Resilience Fund (BCCR)

This research provided TI Bangladesh with an extensive overview of the key public and private actors involved in climate finance governance, the amounts of money that were flowing, and to where, as well as an evaluation of potential corruption risk areas. The research formed the basis of the chapter’s extensive and successful evidence-based advocacy (see Case Study 10).
TOOL 2: KEEPING REDD+ CLEAN

KEEPING REDD+ CLEAN is a manual, developed by Transparency International, that is designed to help interested parties understand and address corruption risks associated with forest carbon accounting – particularly REDD+ – programmes and strategies at the national level. By reading the manual users will learn how to identify corruption risks, and the instruments to address these risks within the development of national REDD+ action plans and strategies, as well as the implementation of REDD+ and other forest carbon projects.

The manual is principally designed for civil society actors who may work with other NGOs, governments and the private sector in order to help design systems that are transparent, accountable, responsive – and thus effective. It will help inform and guide forest carbon risk assessments, but should be adapted by users to fit their country contexts.

More information on the tool can be found HERE.

RELATED ACTIONS:

– In Indonesia, a specific Facebook group, ‘FREDDI Watch’, was created in relation to the REDD+ fund in Indonesia, to enable people to exchange information and raise issues of common concern (the Facebook group can be found here). Moreover, an animated film was produced, illustrating the corruption risks inherent in the country’s awarding of forest licences. The film aimed at building momentum for multi-stakeholder discussions about preventative measures (the film can be viewed here).

– Transparency International Indonesia also produced an animated short highlighting corruption concerns in the forestry sector (link here).

– Our chapters in three major REDD+ recipient countries (Indonesia, Papua New Guinea and Vietnam) have researched potential risks for corruption in REDD+. All three project-countries have identified a worrying lack of knowledge among REDD+ affected communities about REDD+ and the risks and opportunities it presents. To address this knowledge gap, an education campaign regarding REDD+ risks and realities was developed. This campaign was designed to be appropriate and impactful in all country contexts, including among illiterate stakeholders. The education campaign can be found here.
Three of our chapters have implemented the REDD+ step-by-step guide at the national level, namely Indonesia, Papua New Guinea and Vietnam. In ANNEX III you can find a brief overview of areas of concern and lessons learned from these chapters’ national REDD+ risk assessments. Further assessments are under way in Cameroon, Ghana, Zambia, and Zimbabwe.

Other countries have also undertaken corruption risks assessments in regard to REDD+, as follows:

**KENYA** A corruption risk assessment for REDD+ in Kenya was commissioned by the National REDD+ Coordination Office in the Ministry of Environment, Water and Natural Resources, and the UN-REDD Programme, in collaboration with the U4 Anti-Corruption Resource Centre. Transparency International Kenya also provided input.

The report of the risk assessment can be found [here](#).

**DRC AND PHILIPPINES** An issue paper looks at two corruption risk assessments conducted for REDD+ in the country contexts of DRC and the Philippines.

Transparency International inspired the method used in these assessments.

The report can be found [here](#).
RAISING AWARENESS AND BUILDING CAPACITY

Given the limited awareness of corruption risks in climate finance, one major aspect of our work on climate governance is capacity building. The goal of this work is to raise awareness and to reach across boundaries, in order to bring together actors who traditionally have not cooperated with each other (for example, environmental and governance actors) and to raise their capacity on integrity issues.

CAPACITY BUILDING AND TRAINING COURSES

As introduced in Section 3.1, our climate finance governance online training course can be used for capacity building. This course explains the key international climate finance institutions and climate finance decision-making processes in terms of their transparency, accountability and integrity. It reviews specific governance and corruption risks, and explores a range of prevention measures and solutions. You can disseminate this online course to your national stakeholders and also design training sessions for them based on the tool. Several Transparency International chapters have organised training courses to engage national stakeholders in climate governance integrity work.

Below you can find an outline of a training course designed by TI Kenya and links to the module presentations. This course could be built on using the climate /REDD+ material provided in this handbook.
THE PRESENTATIONS CAN BE DOWNLOADED BELOW:

**Module 1:**
Definitions of corruption and examples of corrupt activities

**Module 2:**
Causes of corruption

**Module 3:**
Effects of corruption

**Module 4:**
General corruption prevention strategies

**Module 5:**
Some measures already taken to address corruption in Kenya

**Module 6:**
Diagnostic corruption in organisations and problem-specific anti-corruption strategies

**Module 7:**
Tools for measuring corruption

**Module 8:**
International, regional and national anti-corruption legal frameworks

**Module 9:**
Social accountability tools and anti-corruption work by CSOs

**Module 10:**
Strengths and weaknesses of anti-corruption institutions in Kenya
Other Transparency International chapters, such as our chapter in Maldives, have used the e-learning tool to encourage civil society participation in national climate finance decision-making processes, as outlined in the following case study.

Case Study 3: Transparency International Maldives: E-learning training on climate finance governance for youth groups

TI Maldives published a national assessment of climate finance governance in 2013. This assessment revealed a lack of civil society participation in climate finance decision-making processes. In response to the assessment, TI Maldives has been targeting major national youth NGOs engaged in important policy issues at the national level, with the idea of spreading the word about the importance of addressing climate governance and its critical link to national climate change and sustainability challenges.

After identifying and selecting the most active national youth NGOs working on the ground, TI Maldives held a training workshop, using the Transparency International e-learning course on climate finance governance. Additionally, TI Maldives included a separate learning component on climate finance governance in the Maldives, to brief participants on the assessment of national-related issues. By including the national component, participants could link the overall content of the course to the current situation in the Maldives and were able to understand the impacts of corruption in climate finance on the future of their vulnerable island state. The workshop was fruitful because it was the first time that the attention of the youth groups was drawn to the importance of climate funds being used effectively. The goal of the training was to act as a platform for youth groups to spread the message of good climate finance governance in the country. As a result of the workshop, participants recognised the underlying problem of corruption prevalent in all areas of society as an obstacle to national development and understood the importance of advocacy campaigns, to ensure that the “next generation” grows up as responsible citizens that refuse corruption in all areas.
6 TOOLS FOR CLIMATE GOVERNANCE INTEGRITY

Policy may take some time to put in place, and once in place may not represent best practice or may not be implemented adequately. If this is the case, there are a number of other activities that can be undertaken to fill the gap. A sample of such activities is set out below.

6.1 ADVOCACY AND LEGAL ADVICE CENTRES

Our Advocacy and Legal Advice Centres (ALACs) provide free and confidential legal advice to witnesses and victims of corruption. Offering a simple, credible and viable mechanism for citizens to pursue their corruption-related complaints, ALACs empower citizens in the fight against corruption and play a critical role identifying corruption hotspots that demand reform or official action. Harnessing the powerful, real life data gathered by ALACs on the consequences and mechanisms of corruption, our chapters engage in strategic advocacy to bring about systemic change in public policy and practice. ALACs offer a hotline that any person who believes s/he has experienced or witnessed corruption can call to receive legal advice on how to deal with the problem, to help people to understand corruption issues better and to increase their capacities to address inequities. By tracking the types of complaints received and the institutional responses to dealing with these complaints, ALACs also serve as an important source of empirical data on how and where corruption is experienced within each country, and how effective public institutions are in addressing these concerns. ALACs can help to engage citizens in climate finance policy and project monitoring. More information about ALACs can be found here.

In response to the particular corruption risks faced by communities that are involved in, or impacted by, climate finance projects, Transparency International chapters engaged in climate governance integrity work have begun to use their ALACs to offer targeted support to potential victims and witnesses of corruption in this area. The ALAC teams are thus reaching out to areas where climate projects are being implemented: for example, working with remote forest communities.
Case study 4: Supporting victims and witnesses of corruption in the forestry sector

In Papua New Guinea people own land through a customary land ownership system that is enshrined in the Constitution. Despite this, indigenous landowners are extremely vulnerable to corruption and land grabbing by foreign corporations in collusion with local and national government officials. Between 2002 and 2011, for example, 5 million hectares of customarily-held land was sold off by the government for large-scale agricultural development through a “Special Agricultural and Business Lease”, which allowed companies to circumvent the constitutional rights of indigenous landholders. This massive land grab covers an area that is 12% of the country’s landmass.

In reaction, Transparency International Papua New Guinea has used its ALAC to reach out to remote communities in forest areas that are especially vulnerable to corruption in the land and forestry sectors.

In 2012, for example, TI Papua New Guinea received and took up a corruption case that was brought to them regarding a logging company that had breached its contract with landowners and the terms of the concession, as their logging activities encroached on a protected area. The chapter followed up on the case and provided the community with training and awareness-raising activities related to land rights. With the support of the chapter, the community rallied a coalition of actors made up of civil society, students and professionals from the province in Port Morseby to campaign on the case. TI Papua New Guinea continued to follow up with the community on the case. At last report the pressure exerted by the collective action resulted in the logging company withdrawing from the area and ceasing illegal logging activities. The community have applied to establish an Incorporated Land Group to better protect their constitutional rights to customary land in the future.

As well as campaigning and supporting the individuals and communities affected by corruption, TI-PNG has used the cases they have documented and addressed through their Legal Advice Centre on land rights to advocate for systemic change at the central government level. In recent years the Chapter has received more complaints related to land than any other sector (70 of the 443 cases dealt with by the ALAC since 2009), so the Chapter brought this evidence to the responsible government Department and sought to define ways to address the endemic problem of corruption in the lands sector. Following TI-PNG’s on-going advocacy and constructive engagement, the Department of Lands launched an official complaints desk to improve access and support to individuals and communities affected by corruption in the sector. TI-PNG provided technical support in the setting up of the complaints desk and will continue to provide an advisory and monitoring function as the Department has agreed to share reports on the complaints received, and progress in addressing them, on a quarterly basis.

Above is a video about a case handled by TI Papua New Guinea’s ALAC, involving a community that was not consulted when a logging company breached the terms of its contract.
The Integrity Pact is a powerful tool developed by Transparency International to help governments, businesses and civil society fight corruption in public contracting. It consists of an agreement between a government or government agency (“the authority”) and all bidders for a public sector contract, setting out rights and obligations to the effect that neither side will pay, offer, demand or accept bribes; and that bidders will not collude with competitors to obtain the contract, or bribe representatives of the authority while carrying it out. An independent monitor who oversees Integrity Pact implementation and ensures all parties uphold their commitments under the Integrity Pact brings transparency and invaluable oversight to all stakeholders in the contracting process, from the authority to the public.

The Integrity Pact clarifies the rules of the game for bidders, establishing a level playing field by enabling companies to abstain from bribery by providing assurances to them that their competitors will also refrain from bribery, and that government procurement, privatisation or licensing agencies will commit to preventing corruption (including extortion) by their officials, and to following transparent procedures. Integrity Pacts are legally binding contracts, breaches of which trigger an array of appropriate sanctions, including loss of contract, financial compensation and debarment from future tenders. These potential sanctions act as powerful disincentives to corrupt behaviour, ensuring Integrity Pacts are never simply goodwill gestures. Rather, they enable governments to reduce the high cost and the distorting impact of corruption on public procurement, privatisation or licensing, and to deliver better services to citizens.

Further information can be found here: IMPLEMENTATION GUIDE FOR INTEGRITY PACTS IN PUBLIC PROCUREMENT.
THE FOLLOWING CASE STUDY shows how Integrity Pacts were implemented in two large-scale hydropower projects in Mexico – El Cajón and La Yesca. This study can help other government agencies, NGOs and project implementers learn from this past experience.

Case study 5:
Transparency International Mexico: The implementation of an Integrity Pact in Mexico’s El Cajón and La Yesca project

TI Mexico has extensive experience in monitoring contracting processes and sees Integrity Pacts as a tool that provides assurance to the society and participants regarding how contracting procedures take place. This is achieved by making public relevant information about the conditions under which the contracting procedure has occurred.

Key to TI Mexico’s approach is the “Testigo Social” or “Social Witness”, which is the name given to the person (individual or legal) who acts as the independent external monitor of the process. This is an expert who, together with TI Mexico, monitors and oversees the transparency and integrity of contracting processes. In 2002 the Comisión Federal de Electricidad (CFE) approached TI Mexico to implement an Integrity Pact in the contracting process for the construction and equipment of the 750MW El Cajón hydroelectric project in north-western Mexico. At that time, no regulation existed on Social Witnesses, so TI Mexico established the terms of the pact’s implementation through a service agreement in which the Social Witness is engaged in the process through TI Mexico. Four years later, the CFE initiated procedures to contract the construction and equipment of a similar project, the La Yesca dam, with estimated costs of US$760 million. When the construction work for La Yesca was being planned, the CFE again asked for a Social Witness, and as the legislation regulating Social Witnesses had been enacted in 2004, it requested that the Public Administration Department assign the same Social Witness as for El Cajón, due to its experience, credibility and high-quality work.

An important outcome in the Mexican case is that it was possible to complete two projects of strategic, economic and social importance while protecting their credibility and legitimacy. The absence of scandal is crucial in projects that span long periods of time.
At the international level, some tools for tracking climate finance flows already exist to provide regularly updated information on the sources, destinations and categories of climate finance flows. The UN Framework Convention on Climate Change (UNFCCC) is also working on an international registry and the Rio markers have been developed to tag Organisation for Economic Co-operation and Development (OECD) funding. These tools can help to increase transparency and enable people to scrutinise financial flows in greater detail. At the national level, however, there is still a lack of clarity about where funds are coming from and where they are going. In order to track the money flows, there is a need for greater transparency and budget categorisation to classify climate financing.

In this context, limited access by citizens to information on the use of climate finance at the national and local levels is a problem. Information on how climate finance is used and whether it is reaching its intended beneficiaries is not transparent or accurate in most countries. National governments and CSOs have advanced a number of initiatives to create clarity on these issues and to promote transparency and accountability. TI Mexico is working to identify the portion of the public budget allocated to climate change activities at the federal level.
Climate projects are often implemented in remote and difficult to access locations, far from country capitals. Our chapters have uncovered multiple cases of corruption and mismanagement of climate funds at the local level. In order to address governance failures at the project level, as well as to gain hard evidence and case studies to help make the case for national level governance reforms, our chapters have developed monitoring tools to support communities to monitor the projects that affect them, and to speak out when corruption occurs.

In the following section we introduce two tools which were developed by Transparency International chapters:

1. TI Bangladesh’s Adaptation Monitoring Tool
2. The REDD+ Community Monitoring Tool
1. TI BANGLADESH’S ADAPTATION MONITORING

TI Bangladesh has developed an approach to evaluating the governance of adaptation projects in climate-vulnerable regions of Bangladesh.

TI Bangladesh’s climate governance research team adopts a combination of secondary and primary research methods to track, monitor and assess the implementation of climate adaptation projects, identify corruption and governance weaknesses.

Through this project tracking and monitoring approach, TI Bangladesh has uncovered numerous cases of mismanagement and corruption in climate adaptation projects, identified governance weak-spots and solutions to improve standards in the project planning, implementation and evaluation stages. TI Bangladesh has used the evidence and case studies gathered through this monitoring work to advise the government and international adaptation funds on needed reforms to improve standards.

MAIN STEPS OF THE TOOL

1. MAPPING OF PROJECTS

First the research team developed a research “map” of climate adaptation projects in the country through a desk study of documents and data from national and international institutions (including but not limited to climatefundsupdate.org, multilateral development banks, the UN Framework Convention, the Ministry of Environment, Ministry of Planning etc.

2. FIELD VISITS AND INTERVIEWS

Information on planning, implementation and supervision of adaptation projects were collected from local communities in selected areas through project site visits and direct interviews with community people. These interviews intended to establish clarity regarding the roles and responsibilities of particular institutions, examine the level of independence by key actors in the decision-making process, and determine the degree of community involvement in the planning and implementation of projects.

3. INTERVIEWS WITH KEY INFORMANTS

The research team also conducted interviews and collected opinions of key informants who are involved in the funding, implementation and administration of adaptation projects. Investigative journalists in the project locality also provided important insights into local-level governance of projects. The diversity of key informants helped the chapter to capture a wide range of information regarding the viability of the projects and their potential/actual value to local communities.

4. RELEVANT PROJECT INFORMATION

Information, including rules related to the utilisation of the funds, project proposals record and reports, and credible news reports, etc., was reviewed. Additionally, information was collected from other organisations affiliated with the fund recipient organisation. Where concerned authorities were reluctant to share/disclose such information, the team employed the Right to Information Act to gain access to key documents.
One adaptation project TI Bangladesh visited in 2012 is described below:

The project was to provide cyclone resilient housing. However, the required consultations with the local community did not occur, no monitoring or complaints system was in place, and the building supplies were sold off by local contractors, leaving the houses unfinished.

These pictures show the same house before (picture 1) and after TI Bangladesh’s engagement and advocacy to put pressure on the government to implement reforms and complete the project in 2015 (picture 2).
2. REDD+ COMMUNITY MONITORING TOOL

In order to reduce the risks of corruption in forest protection programmes in Vietnam, TI Vietnam developed community-monitoring approaches to increase citizen participation and oversight of how forest finance projects (like REDD+) are delivered and implemented on the ground. To implement these monitoring approaches, TI Vietnam worked with local CSOs with long-standing histories of outreach and engagement with the affected communities in the target provinces.

PUBLIC EXPENDITURE TRACKING SURVEY (PETS) AND COMMUNITY SCORE CARD (CSC)

PETS is a set of tools to help local people understand financial flows from central level to provincial and grassroots level, and to detect instances when money goes missing. CSC, on the other hand, is a useful tool to promote community participation in the on-going evaluation of the implementation of forestry programmes.

When adapted to the forestry sector, these community-monitoring tools provide an opportunity for local people to raise their voice and offer their perspectives regarding the suitability and effectiveness of projects as regards matching the national forestry and REDD+ strategy. Through cooperation with local partner organisations, TI Vietnam organises discussion forums and a “training of trainers” approach, to allow local leaders to train their communities on the use of these tools, creating a space for practice and encouraging dialogue between local communities and local authorities.

TI Vietnam’s approach to developing and implementing these community monitoring tools involved six major steps, to introduce PETS and CSC to local communities, as follows:

The handbook TI Vietnam have developed on the implementation of the PETS and CSC monitoring tools can be found here.
OUTCOMES

Following the implementation of the community monitoring tools, TI Vietnam organised consultations between local people and forestry protection authorities in Quang Binh and Lam Dong provinces. During the consultations, local citizens raised issues related to the distribution of benefits, delays in payments and alleged misuse of payments by the local authorities. In both provinces, authorities reacted positively, revising elements of the project implementation, including the reviewing the allocation of funds. Despite achieving some initial successes, however, challenges remain in regard to accessing information about forestry programmes, as well as ensuring the on-going commitment of local authorities and maintaining the motivation of local people.

Understanding these challenges, TI Vietnam decided to work closely with local partners and authorities to support the development of a provincial forestry-monitoring plan and to achieve a commitment from the authorities to improve the transparency and accountability of this plan. As a result, without any further support on the part of TI Vietnam, local people and authorities continued to independently work on monitoring forestry programmes.

The video below explains TI Vietnam’s approach to supporting forest protection funding in Vietnam, by keeping projects corruption free.
INTERNATIONAL CLIMATE FUNDS

TI'S ASSESSMENT OF THEIR ANTI-CORRUPTION PERFORMANCE

Ensuring space for, and the active participation of, civil society in decisions on climate policy and funding allocations is critical to the effective use of climate finance on the ground. Transparency International chapters have been fighting to secure a place for independent oversight of national climate funds and other major decision-making bodies, with some significant successes!

Experiences around the world demonstrate the extent to which the impacts of climate change and corruption are felt at the local level and particularly affect the poor. Corruption or corrupt behaviour can undermine climate-financed mitigation and adaptation programmes or projects, and can weaken environmental and social safeguards.

People who suffer from these consequences or even witness corrupt action need to have avenues to raise their voices and bring violations to the attention of those who can act to resolve them. Yet reporting such cases may be, and often is, complicated and risky. One reason for this is that the projects in question may be financed by a number of multilateral, bilateral and national public funds. These projects may also be financed through private investments. Knowing who is in charge, and to whom one should and can safely submit a report of a complaint, may be confusing. One may even fear retaliation, which in some cases may be life threatening.

In this context, the following section aims to introduce and explain the complaints and investigation mechanisms for international climate funds. However, it is clear that it is preferable that those cases of corruptions and violations of environmental and social safeguards be avoided in the first place. Effective preventative measures should therefore be put in place. One method is to ensure that civil society and local stakeholders are consulted meaningfully throughout climate project cycles. Again, given the multitude of different climate finance sources and conduits, understanding how such consultative process works will be useful. This section thus therefore also aims to explain the civil society consultation mechanisms of multilateral climate funds and existing policies to enable independent civil society actors to participate meaningfully in the fund processes.
IN FIVE DIFFERENT ASSESSMENTS, Transparency International has examined the anti-corruption practices and internal accountability mechanisms of seven major climate funds. The aim of these assessments was to analyse the policies and practices that the funds have in place to prevent corruption and enable accountability. The purpose of this study, reported in five reports published in 2014, was to contribute to the positive development and strengthening of the funds in regard to supporting the effective achievement of their objectives to deliver adaptation finance and results for developing countries.

LINKS TO THE REPORTS

- The Adaptation Fund
- The two Climate Investment Fund Trust Funds
- Two of the Global Environment Facility Funds
- The UN-REDD Programme
- The Forest Carbon Partnership Facility

ANNEX IV PROVIDES COMPREHENSIVE INFORMATION ON HOW TO GET ENGAGED WITH THESE FUNDS AND HOW THE FOLLOWING POINTS ARE ADDRESSED:

- Complaints and investigation mechanisms
- Civil society consultation
- Observer participation
Case study 7: Transparency International Korea’s Green Climate Fund pre-board meeting and observer activities

The Green Climate Fund (GCF) was adopted as a financial mechanism of the UN Framework Convention at the end of 2011 and is expected to become the main multilateral financing mechanism to support climate action in developing countries. Since GCF’s inception, Transparency International has been advocating ensuring transparency, accountability and integrity are embedded in the guiding principles, policies and practices of the fund.

In this context, TI Korea (South) collaborates with a coalition of international CSOs in monitoring the development of the fund’s policies and processes. The chapter attends CSO meetings hosted in advance of the GCF’s Board meeting in Songdo. In these meetings, relevant GCF documents are studied and their contents discussed, with the goal of agreeing on interventions with one united civil society voice. These meetings are vital for gathering support for Transparency International’s cause of strengthening the transparency, integrity, and accountability of the fund.

Whilst all CSOs, groups or individuals that are accredited by the GCF can attend general board meetings as observers, they are excluded from executive sessions. Civil society have only two active observers – one representing CSOs from the global North and one for the South – which present the coalition’s collective input to the fund. CSO observers seek to influence board members’ decisions by challenging the contents of the documents presented and offering alternative views and suggestions.

Some progress has already been achieved: strong provisions for transparency and accountability have been embedded in various policies and processes under GCF. We will continue to seek to influence the development and creation of three independent units in the GCF, which will have great influence in pushing the GCF and making its projects more transparent and accountable – namely the Independent Redress Mechanism, Independent Integrity Unit and Independent Evaluation Unit. As well as contributing to collective civil society inputs to the GCF, in the future, TI Korea will serve as an independent observer to the GCF’s Procurement Committee and will offer knowledge and tools relating to transparent and accountable procurement processes.
Case study 8: Bangladesh: National advocacy and policy influencing

Climate change presents a host of new challenges for Bangladesh’s citizens. Floods, tropical storms and prolonged droughts change day-to-day living conditions, especially for the poorest groups in society. The government of Bangladesh is responding to the challenges presented by climate change, however, and climate-related expenditure already accounts for a significant share of its national budget. This money is channelled through a dedicated climate change fund – the Bangladesh Climate Change Trust Fund (BCCTF).

As a reaction to the expanding national climate finance governance landscape, TI Bangladesh undertook multiple studies between 2011 and 2014 in which, based on monitoring adaptation and low carbon mitigation projects, the chapter analysed the existing climate finance architecture, assessed the governance of key climate fund actors and examined funding flows as well as the quality of climate fund utilisation, using a climate finance governance assessment.

Several research methods were applied for the assessment: surveys and direct interviews with affected and beneficiary communities, national and local level officials from various government departments, and implementing agencies.

TI Bangladesh’s evidence-based advocacy has produced significant results in regard to improving the transparency and accountability, and addressing corruption risks, in climate finance in Bangladesh. One key finding of the assessment was that no guidelines to evaluate the impacts of completed BCCTF projects were available. Following the evidence-based advocacy by TI Bangladesh, however, the BCCTF Trustee Board agreed to evaluate 62 completed projects and carry out special audits of 26 projects. A breakthrough in this important issue was also that BCCT issued a notice to make public hearings in each project implementation area available, in order to implement complaint mechanisms and receive suggestions from the community. To find out more about TI Bangladesh’s work on how to push the climate governance agenda with their advocacy work, please refer to case study 10.
8
PUSHING FOR CHANGE: ADVOCACY

This chapter gives a brief introduction to advocacy by providing information, lessons learned and tools, to plan advocacy, frame the national debate and influence decision-makers. Ultimately, the chapter’s aim is to help users plan and deliver effective advocacy that can place climate governance on the agenda of national decision-making processes and to promote increased accountability, transparency, and integrity in climate finance.

Case studies 8 and 9 illustrate how TI Bangladesh and TI Kenya could influence governments through direct engagement with relevant ministries, and demonstrate in which ways national policies can be influenced through advocacy.

8.1 ADVOCACY: DEFINITION AND CONTEXT

The word advocacy is defined by most dictionaries as the process of speaking on behalf of someone, and can be described as a process of influencing the attitudes and behaviour of targeted people in order to change the policy and practice of governments and other institutions.

Today the concept of advocacy has evolved to include work undertaken by development agencies, civil society groups, and individuals to bring about positive change. Advocacy encompasses work to raise the awareness of the public, activities related to the creation or reform of policies, and activities to ensure the effective implementation and enforcement of policies.

In cases where government policies exist but are not implemented, advocacy also plays an important role – by inducing a government to change policy. Processes of change such as these are effective from the community level through to national and international levels. The local level is perhaps the most important for advocacy: individual and community investment in issues that are important to them is the seed from which change begins. It is this desire for change, focused through advocacy, that can place climate finance governance on the agenda of national decision-making processes and promote increased accountability, transparency, and integrity in climate finance.

FOR FURTHER INFORMATION TAKE A LOOK AT THE TRANSPARENCY INTERNATIONAL CLIMATE GOVERNANCE PROGRAMME ADVOCACY TOOLKIT.
Governments have the primary authority to set policies and make laws to guide the economic, social and political norms for society. The decisions they take today on consumption, energy use, environmental and natural resource protection, adaptation programmes, loss and damage and budget allocations will have a critical influence and impact on what our planet will look like in decades and centuries to come. Ultimately, influencing policy and decision-makers in government is a crucial part of advocacy work on climate finance governance and it is important to do it effectively.

In planning advocacy towards governments, it is essential to understand their functional structure as well as where and how decisions are made. It is also necessary to understand the political dynamics – where the power actually resides. It is important to remember that the people in government do not have a single viewpoint in relation to your issues. We can have both allies and opponents in the same structure and we need to engage with them strategically.

Case study 9: Kenya – laws and policies influenced

In March 2015 the Kenya National Assembly unanimously passed the Climate Change Bill, making 2014 a major milestone in the quest for Kenya’s attainment of a specific law to coordinate climate change activities.

The journey towards a coordinating legal framework had already begun in 2009, however, when the National Climate Change Response Strategy was drafted. It was later launched in April 2010. The strategy suggested establishing the robust measures needed to address the challenges posed by climate variability and change. Later, an action plan was developed after 20 months of analysis and consultations with a wide spectrum of stakeholders, including TI Kenya. The action plan was launched in March 2013. The action plan aimed to implement the strategy, addressing options for a low-carbon climate-resilient development pathway, enabling aspects of finance, policy and legislation, knowledge management, capacity development, technology requirements and monitoring and reporting.

During the development of the action plan, TI Kenya was actively engaged in the first formulated climate change bill, calling for provisions on transparency, accountability and public participation through strategic advocacy among government entities and other CSOs. The bill was passed by parliament in December 2012 and sent on to the president for assent. The president vetoed the bill citing a lack of public participation in the formulation. The CSO network largely disputed this since they had conducted public hearings across the country prior to the tabling of the bill in parliament.

Despite this setback, steps were taken to re-commence the development of climate change legislation in 2013. In this context, the cabinet secretary for environment and natural resources appointed a national steering committee to undertake the development of the draft legislation. TI Kenya engaged in the drafting of the 2014 climate change bill and was nominated to sit on the taskforce on the bill. The bill was unanimously passed by the parliament in March 2015 and forwarded to the senate for debate. The senate called for a public hearing of the bill in April 2015. TI Kenya submitted a memorandum with a raft of proposals and we are keenly following the situation to see if they will be considered during the debate and in the final bill.
INFLUENCING CLIMATE AND REDD+ POLICY GUIDANCE FOR NATIONAL CHAPTERS

At the chapter meeting held in Kenya in May 2015, TIS delivered a session on influencing global policy and the link to national level work. As a result of this session it was proposed that a guidance note could be prepared to support chapters in assessing and inputting on policies being developed in their countries. This document attempts to do so.

Much of the content set in the document can be applied to any policy, process or practice that you wish to review. In all instances TI is looking to ensure that the policy, process or practice demonstrates best practice in terms of transparency, accountability and integrity. If you don’t want to get completely overwhelmed, you may have to make some choices in terms of where you want to spend your time and for that you may need to prioritise by asking yourself, how important is this policy/process or practice to REDD+ / Climate in my country? How much pay back will I get back on this for the effort I put in? What happens if I don’t input at all?

PLEASE FIND THE WHOLE DOCUMENT HERE.

This photo was taken in the Prey Lang forest in Cambodia. Kul, 58, is a farmer and community activist. She belongs to a group of women fighting to regain their land – land she says the government evicted them from so that it could sell that land to foreign companies. In this photo, Kul is on top of hundreds of kilos of wood that once formed the forest where she has lived since her childhood. Once the wood from the forests has been sold, foreign companies use the land to grow sugarcane and rubber, which ultimately benefits politicians and the military (2013). Photo by David Rengel, from “Capture Corruption” – a global photo competition that sought the most powerful images of corruption and its devastating impact on lives around the world.
8.3 ENGAGING PEOPLE

The following section provides details of ways that civil society can engage local communities in national climate finance governance, and the tools that can be used for this purpose. It provides details of success stories relating to establishing national networks on climate advocacy and climate governance. After the national climate architecture has been understood, awareness of the underlying problem of corruption in climate finance flows has been carried out, and steps have been taken to prevent these risks, it is important to push for change by collaborating with national policy-makers and supporting local voices.
I. COLLABORATION WITH POLICY-MAKERS

To work in collaboration with national policy-makers and to frame the issue of climate governance, it is important to get the balance right – being strong on anti-corruption reforms but careful not to be seen to be blocking climate finance or following a “western” compliance agenda. One way of introducing the issue of transparency in climate change is to use the e-learning course to build understanding and trust in the government and key agencies before speaking loudly about corruption as a challenge. However, it is vitally important that chapters as well as any other CSOs adopt assurances regarding their legitimacy, credibility and accountability in every possible way. To do so, a good starting point is to adopt an ethical framework and a commitment to uphold integrity core principles as well as a conflict of interest policy.

SEE FOR EXAMPLE TRANSPARENCY INTERNATIONAL’S POLICIES:

TRANSPARENCY INTERNATIONAL CODES OF CONDUCT AND CONFLICT OF INTEREST POLICY.
II. SUPPORTING LOCAL VOICES

Climate change is a particularly pressing issue for the poor and vulnerable. They are often the worst affected by climate change impacts, and yet they contribute least to the problem. With decisions relating to climate finance made largely by governments and those in power, civil society is increasingly looking to ensure that the poor and vulnerable are able to reach and influence decisions and are not excluded from policy-making processes. It is not only a matter of justice and rights that policy-making and the design, management and monitoring of projects should involve those who are affected; it is also the case that those projects and programmes will be more effective with community involvement.

Below is a video from Transparency International Indonesia that discusses existing corruption risks in forest governance due to a lack of transparency and insufficient supervision by local communities. This video highlights the importance of information disclosure and community involvement.
COMMUNICATING SUCCESS

Most CSOs work with the media to educate the public, promote their work or highlight important news and events. Furthermore, engaging the media and getting coverage of advocacy messages can be a very important part of the advocacy strategy because:

1. Media can influence government officials and decision-makers directly. Seeing climate governance issues being covered in the media can encourage policy-makers to give them more attention and can make them more responsive to advocacy messages.

2. Media can also influence policy-makers indirectly by helping to shape public opinion and build public pressure. Whether or not it is possible to reach policy-makers directly through lobbying, getting coverage in the media for advocacy messages is likely to strengthen the overall influence.

MEDIA USE:

- raise the profile of climate finance governance and potentially increase the importance that people give to it
- transmit information to a wide audience and help explain complicated issues such as climate finance in a simpler way
- investigate the local/national implications of climate finance that an individual would not have time or resources to research themselves
- influence public opinion through editorials and news coverage to get involved
- question the government, organisations and institutions on behalf of citizens and thus encourage public debate on climate finance, integrity, and accountability
- expose issues or problems that certain people or organisations do not want to be made public or want to avoid discussing (climate finance)
- give visibility to networks and organisations working on the ground.

Generally speaking, an overall communication strategy should be in line with the advocacy approach, so that the media engagement supports advocacy objectives and influences the selected target audiences. In this context it is worth thinking about which media should be engaged. This choice should be mainly driven by who you want to reach and which media your target group reads/watches/listens to. Furthermore, it is important to decide what kind of
coverage is desirable and to understand the type of story that the chosen media are interested in.

It is also important to ensure that your organisation has a media spokesperson who is available when a journalist needs them – which is often at short notice. Spokespeople should inspire trust and transmit a clear message. It is important to have comprehensive knowledge of the issue of climate finance and related corruption risks. This knowledge can be gained by, for example, using the e-learning tool. It is also essential to cultivate relationships with journalists over time – it can be too late to get to know a journalist when you have some urgent climate change news you want to disseminate. To build these relationships, try to identify which journalists are interested in climate governance by seeing who is writing or presenting related articles, and compile a list or database of national media contacts and their affiliations, special interests and contact details. Maybe even organise a training workshop for journalists interested in climate governance, where the chapter can explain the issues and background science, help clear up any misunderstandings journalists might have and suggest angles for stories. This might also be a good occasion to introduce the e-learning tool, which can be completed individually and afterwards discussed in a group. To collaborate with journalists, it is also possible to take them to the field to give them grounded material on which to base their stories (see case study 8 on Bangladesh and the BCCTF).

Even though this handbook can provide a brief idea about how to communicate with the media, it is important to keep in mind that EVERY COUNTRY IS DIFFERENT. However, a rough generalisation is that politicians and ministry officials will often read and be influenced by the main daily newspapers in your country. Urban middle classes will watch TV and read daily newspapers (and may also access news online). People living in rural areas, on the other hand, are more likely to listen to FM radio than watch TV or read newspapers.

TOOLS, METHODS, RESOURCES

This section provides resources that can help civil society groups to successfully communicate their work on climate finance governance. Generally speaking, there is an art to making the issues of concern “newsworthy” in order to attract others’ attention. In this context it is important to keep in mind that stories must compete with huge amounts of available information and to get into the news a story should be new and significant. It is also important to remember that pictures have the potential to be more powerful than words and that television relies on pictures – and often has no time for complex or detailed messages. Campaign Strategy, for example, provides useful guidance on communication, such as using pictures (on the basis that images are more powerful than words).
MAKING CLIMATE GOVERNANCE ACCESSIBLE:

The issue can be perceived as technical and abstract given the complexity of the organisations involved, and the mechanisms and channels through which money is flowing, and it can also seem difficult to get involved in at the local level. Therefore, it is important to translate this issue into “simpler language” that can be understood by the target group.

BELOW ARE SOME USEFUL GUIDELINES AND RESOURCES:

- Our blogging guidelines
- Our writing style guide
- Our Climate Governance Integrity Communication Kit
- TI Flickr library
10. STAKEHOLDERS

Once the research on the national climate finance governance has been done, the next step is to map the key stakeholders. In this context it is important to understand: 1) who is already engaged in the issue of climate finance governance; 2) who you should consider cooperating with; and 3) who needs to change. Therefore, the next chapter presents ways to identify key stakeholders that need to be considered when starting to work on climate governance integrity, and tools for doing so.

The following case study demonstrates the importance of coalition, showing how Transparency International Peru got engaged with stakeholders to build and enforce a national network on climate governance integrity.

10.1 STAKEHOLDER ANALYSES

Stakeholders are all those individuals who affect or are affected by policies, decisions or actions within a particular system. Stakeholders can be single individuals, groups of people, organisations and/or institutions, at different levels – international, regional, national or local. A stakeholder analysis is used to identify the key actors, assess their knowledge, interests, positions, alliances and importance in relation to a policy or decision-making process. Conducting a stakeholder analysis makes it possible to effectively and strategically target advocacy activities to the stakeholders that will be most influential in achieving your objective.
EXAMPLES OF STAKEHOLDERS

GLOBAL/INTERNATIONAL:
International agencies, donors, business lobbies

NATIONAL:
National governments, NGOs

REGIONAL:
Police departments, regional authorities

LOCAL:
Local communities, local authorities and the local population

CLICK THE LINK FOR FURTHER INFORMATION ON THE METHODOLOGY USED IN THE CLIMATE GOVERNANCE PROGRAMME ADVOCACY TOOLKIT. OR TAKE A LOOK AT OUR PRESENTATION ON STAKEHOLDER MAPPING AND ANALYSIS.

10.2 NETWORKS

Climate governance networks are platforms that can be used to enable shared-learning, information exchange, collective advocacy and research activities. Furthermore, they have the potential to enable communities of practice or technical expertise on climate related issues, such as mitigation, REDD+, adaptation, loss and damage, climate funds and technology transfer. Networks also have the potential to generate more resources and to increase the credibility and visibility of projects and actions on the ground. In addition, networks can potentially broaden the base of support and create opportunities for learning, as well as peer support and motivation.

Depending on the context of the country, different approaches have been taken: some Transparency International chapters have decided to create their own networks, others have decided to join already existing networks and to bring the governance angle to them.
ESTABLISHED NETWORKS:

BANGLADESH:
CLIMATE FINANCE GOVERNANCE NETWORK

In 2011 Transparency International Bangladesh established the Climate Finance Governance Network with other non-government organisations, individuals and networks. The major objectives of the network are to undertake joint advocacy actions to ensure transparency, accountability, good governance and stakeholder participation in the allocation and use of climate funds raised from national and international sources. Furthermore, the network is attempting to bring about positive changes at the local and national level on the basis of the mutual exchange of information, knowledge and skills within communities of practice. Following those efforts, TI Bangladesh is now also operating a Facebook page with the title Climate Finance Governance Network. The idea is to transfer global and local knowledge about climate governance. Currently, more than 1,000 people are actively following the site and it has the potential to benefit thousands of civil society organisation (CSO) representatives, youths and other volunteers.

PERU: GRUPO PERÚ COP

20 Please see case study number 12.
CONNECTING ON ISSUES
CSO NETWORKS

This section aims to provide information on existing CSO networks related to climate finance governance. A list of existing CSO networks working on climate governance and how you can get involved in these networks is given in the Annex V of this handbook.

Case Study 11: Transparency International Kenya: The success of national networking

When it comes to advocacy, a single voice can only shout so loud, but with a much stronger and more collective voice there are more chances of being heard and of achieving results. This is also the case for civic participation and oversight in climate governance.

In this context, TI Kenya is following in the footsteps of TI Bangladesh and its framework in order to actively contribute to promoting anti-corruption, transparency, accountability and public oversight in the development and implementation of climate actions, governance, financing policy and processes for adaptation, mitigation and REDD+ actions. In pursuit of this goal in recent years TI Kenya has deeply engaged in networks to achieve its objectives. In Kenya, CSOs focused on climate-related issues are clustered into four major networks. Through their members, who are drawn from institutions that work on various climate change issues, these networks have rich and diverse expertise, and have been instrumental in advocacy and bringing about legal reforms in Kenya. Furthermore, they enjoy a cordial working relationship with the government and more often than not are selected to represent CSOs in major taskforces.

TI Kenya has also been trying to build the capacity of the networks on climate governance to ensure the existence of an effective watchdog in the country. The networks have been very easy to work with, especially when there are matters of national importance at stake that require careful thought from stakeholders. For instance, when the climate change bill was debated in parliament, TI Kenya convened network meetings to identify key issues and advocate for their resolution. The networks play a critical role in shaping the country’s positions and international climate change negotiations. When the country’s positions are drawn up, the networks are invited to provide their perspectives, and these perspectives are considered in the final country position. This year, a committee comprising government and CSOs will be created to draw up the country’s position ahead of the UN Climate Change Conference in Paris in November–December 2015 (COP21). The CSO members of this committee have been nominated from the networks. The government also includes some of the CSOs in its delegation to international meetings. Finally, the networks are an important source of updates on current affairs around different issues related to climate change. Their diverse composition makes it easy for them to keep abreast of different matters as all members work on different issues.
11

MONITORING
AND
EVALUATION

Monitoring communication outcomes means making periodic checks on “How we are doing” by tracking who is doing what. While both monitoring and evaluation attempt to measure results, there is a difference between the two terms.

- Monitoring should track inputs, outputs and intermediate outcomes so that adjustments can be made to the programme during implementation.
- When carrying out monitoring the number of indicators should be limited so that data are easy to collect, analyse and disseminate periodically during the life of the communication activities.
- Monitoring should focus on WHAT is happening (are frontline workers using communication skills? Are adolescents talking to their parents about education and delaying marriage?)
- Evaluation, on the other hand, is a more comprehensive study of the role of communication in the overall programme, and is done, usually, at the end of the programme cycle. By being more comprehensive, evaluation explores WHY behaviours are/are not happening. (Monitoring becomes too heavy if it addresses these issues.)

HERE you can find our guide on monitoring and evaluation. This guide provides quick and simple insights into the most common monitoring and evaluation issues and offers advice on the questions you need to ask yourself and the steps you need to take in order to design, assess and draw lessons from your programme work. The guide starts with basic monitoring and evaluation principles and what they mean for you – as well as for Transparency International. It gives you the main elements of effective monitoring and evaluation frameworks, and introduces tools that are helpful in campaigning, building a movement and providing services to citizens.
11.1 BASELINE SETTINGS

To have truly useful indicators it is necessary to baseline them. Baseline data provides information about the situation before the start of any intervention. From the baseline results, it is possible to set targets. Progress and comparisons are assessed against the baseline and the targets.

A quantitative or qualitative reference point or standard – putting indicators into context – should be determined, against which performance or achievements can be assessed. The context may be external, e.g. the standard expected for the sector, or internal, e.g. the reference point when compared to the previous baseline for the indicators in question.

11.2 MONITORING AND EVALUATION OBJECTIVES

To form behavioural objectives, you need to start with programme objectives and clarify the key behaviours needed to achieve the objectives. If the programme requesting the communication strategy does not have clearly defined behavioural objectives and participants, it is recommended that the programme conduct workshops or meetings with partners, stakeholders, and communities to develop these objectives. Objectives are important for programme planning for social and behaviour change and are not just an issue for communication.
SMART OBJECTIVES

A good behavioural objective is SMART (specific, measurable, area-specific, realistic and time-bound), but, in addition, it should state clearly whose behaviour is being measured and it should state what behaviour should be practised. Many programme objectives are SMART, but they do not clearly state whose behaviour is involved and what behaviour is to be achieved.

SPECIFIC
identifies concrete events or actions that will take place

MEASURABLE
quantifies the amount of resources, activities, or change to be expended and achieved

APPROPRIATE
logically relates to the overall problem statement and desired effects of the programme

REALISTIC
provides a realistic dimension that can be achieved with the available resources and plans for implementation

TIME-BASED
specifies a time within which the objective will be achieved

11.3 PERFORMANCE INDICATORS

Performance indicators are tools that can assist in measuring processes, outputs, outcomes, and impacts for development projects, programmes, or strategies. When supported with sound data collection—perhaps involving formal surveys—analysis and reporting, indicators enable managers to track progress, demonstrate results, and take corrective action to improve service delivery. The participation of key stakeholders in defining indicators is important because they are then more likely to understand and use the indicators for management decision-making.

In order to properly monitor and evaluate a project it is also important that indicators are unambiguously specified so that all parties agree on what they cover, and it is important that there are practical ways to measure them. Indicators at the impact and result level are particularly important for monitoring and evaluation purposes but are, if poorly defined, poor measures of success. Risks lie in defining too many indicators, or defining indicators for which there are no accessible data sources, making them costly, impractical and likely to be underutilised.

Below you can find a set of indicators that Transparency International chapters have used so far for their work on climate governance integrity.
## INDICATORS

**Concerned citizens and stakeholders are better able to engage in REDD+ policy development, implementation and monitoring and demand public accountability**

- Number and scope of outreach activities offering citizens quality information and tools that enable them to address climate corruption issues.
- Number and quality of Transparency International, civil society and citizen monitoring actions to demand accountability regarding climate governance integrity actions.

**Victims and witnesses of corruption in climate finance articulate and find solutions to their grievances through legal advice and support mechanisms**

- Number and quality of changes in the discourse, policy and/or practices in relation to climate as a result of project monitoring.
- Per cent of grievances successfully resolved (in particular, number of victims and witnesses by gender, sector).

**Public and private sector actors are more responsive to, and better able to identify and engage in, targeted governance reforms to enable effective implementation and enforcement of REDD+ by preventing corruption and ensuring transparency, accountability and integrity**

- Number of clients stating an increase in awareness of their rights attributable to safeguards as a result of support from the chapter.
- Number of key national level stakeholders engaged in addressing climate finance corruption through participation in national networks.
- Number and quality of partnerships with public/private actors to improved transparency, accountability and corruption prevention practices.

- Number and quality of changes in discourse, policy and/or practices as a result of Transparency International's evidence-based advocacy.
This chapter aims to show ways in which organisations that want to start working on climate governance integrity can mobilise financial resources and help to gain an overview of existing funding channels. In addition, the chapter provides guidance on how to write a proposal, who to get in touch with at the national level, useful resources to mobilise resources and guidance on how to compose project proposals.

The first part of this chapter addresses the option of public fundraising through multilateral and bilateral donors. You will find useful resources on fundraising, financial stability and cases how Transparency International chapters managed to allocate funds due to bilateral donors at the national level.
12.1 BILATERAL AND MULTILATERAL DONORS

In this section you will find information about the funding available through multilateral development banks and examples of chapters that have received funding through bilateral donors who were approached in-country.

THE MAIN DONORS FOR OUR WORK ON CLIMATE GOVERNANCE SO FAR HAVE BEEN

- The German Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMU):
- The International Climate Initiative (IKI):
- The Norwegian Agency for Development Cooperation (NORAD)
- The European Commission (EC)
- UNDP

EXAMPLES OF BILATERAL NATIONAL FUNDING

TRANSPARENCY INTERNATIONAL CAMEROON accessed money from the French Embassy to support the organisation of several surveys and workshops (even if the amounts were small – a few thousands Euros – they allowed TI Cameroon to carry out these activities).

TI BANGLADESH has carried out climate work as part of its core activities and it received a grant from the UK’s Department for International Development to continue and expand this work over the next three years.

GHANA INTEGRITY INITIATIVE, TRANSPARENCY INTERNATIONAL ZAMBIA AND TRANSPARENCY INTERNATIONAL ZIMBABWE are allocating some core money to climate work and could also count this as match funding for their EC-funded REDD+ Governance and Integrity project.

TRANSPARENCY INTERNATIONAL MALAYSIA has received grants from the Norwegian Embassy to support the Forest Watch Project, launched by Transparency International’s Forest Governance Integrity Programme. The idea is to involve the public to become the eyes and ears of the forest by carrying out monitoring using Google Earth Geospatial Technology.

MORE INFORMATION CAN BE FOUND HERE.
TRANSPARENCY INTERNATIONAL CHAPTERS ARE ALSO IN TOUCH WITH THE FOLLOWING POTENTIAL DONORS WHO HAVE SHOWN INTEREST IN WORK ON CLIMATE GOVERNANCE:

- The French Ministry of Foreign affairs
- Agence Française de Développement
- Department for International Development – UK
- Australian Agency for International Development
- United States Agency for International Development

OTHERS INCLUDE:

- African Development Bank
- Asian Development Bank

HELPFUL RESOURCES

- OUR GUIDELINES ON FUNDRAISING
- OUR RAISING FUNDS FROM THE PUBLIC TOOLKIT provides information and practical advice on raising money from individuals. Included in the toolkit is detailed information on fundraising techniques, such as direct mail and digital fundraising, shared fundraising experiences from national chapters within the movement, and fundraising stories from other NGOs who are successfully raising funds from the public.
- OUR RAISING FUNDS FROM BILATERAL AND MULTILATERAL DONORS TOOLKIT: provides information and practical advice on mobilising resources from, and maintain trustful relationships with, bilateral and multilateral donors. Included in the toolkit is detailed information on the research and identification of potential bilateral and multilateral funding sources, and information on how to approach donors and apply for funding.
- OUR GUIDE TO FINANCIAL SUSTAINABILITY
- OUR TEMPLATE FUNDING PROPOSAL
- USEFUL PHRASES TO USE WHEN COMPOSING A FUNDING PROPOSAL
- A SAMPLE THANK YOU LETTER: Thanking a donor for their contribution, no matter how big or small, is fundamental to good fundraising. A sample letter can be found here.
This section provides resources on private sector fundraising. The Boccioni Study is an assessment of potential corporate donors in different sectors: forestry, insurance, fishery, agro-food, tourism, green energy and the financial sector. It is important to keep in mind, however, that these approaches are not tried and tested – they are merely suggestions – and that up until now Transparency International has not seriously explored private sector fundraising.

According to the Boccioni Study report, the forestry industry and agro-food industry have the clearest connection with Transparency International’s climate team, in terms of their impact on climate change and corruption. Also, the companies in these sectors are big in terms of size and revenues, and global presence, and they have already programmes relating to climate adaptation or corporate social responsibility. The fishery sector is also affected by both climate change and corruption but the companies in the study have been exposed to scandals in the past. However, this fact can also be seen as offering a big opportunity – for example, Unilever, which was affected by a scandal, is now working very hard on its sustainable practices.

12.2 PRIVATE SECTOR FUNDRAISING

THE FULL REPORTS OF THE BOCCIONI STUDY CAN BE FOUND BELOW:

- SECTOR AND COMPANY PRIORITISATION
- FUNDING AND STRATEGY RECOMMENDATIONS
Here we want to provide an opportunity for TI chapters that have been working on climate governance integrity over the past few years a chance to share their lessons. The chapters featured in the following video have been working to improve transparency, accountability and integrity in relation to adaptation, mitigation and the REDD+ project. In line with the messages from various national chapters discussed throughout this handbook, the video highlights, by way of conclusion, what these chapters consider to be the “top piece of advice” they wish to share with other chapters that are interested in working on climate governance integrity.

“Always be prepared to adapt and change your approach!”
ANNEX I: FURTHER RESOURCES

ANNEX II: COUNTRY REPORTS: GOVERNANCE RISK ASSESSMENTS

ANNEX III:
COUNTRY ASSESSMENTS – REDD+ CLEAN STEP-BY-STEP GUIDE

ANNEX IV:
MULTILATERAL CLIMATE FUNDS

ANNEX V:
MAJOR GLOBAL CSO NETWORKS
ANNEX I: FURTHER RESOURCES

NEWS AND UPDATES:
INTERNATIONAL INSTITUTE FOR SUSTAINABLE DEVELOPMENT LIST SERVERS
The International Institute for Sustainable Development Reporting Services LISTSERVs are peer-to-peer mailing lists for policy-makers and practitioners involved in sustainable development policy. This free knowledge-sharing tool helps users to better publicise and coordinate their efforts through virtual knowledge exchange.

CLIMATE-L is a news and announcement list that focuses on climate change policy and issues. Further information about the list and the subscription procedure can be found here.

DATA:
CLIMATE FUNDS UPDATE (ODI-HEINRICH BOELL STIFTUNG)
www.climatefundsupdate.org
Climate Funds Update is an independent website that provides information on the growing number of international climate finance initiatives designed to help developing countries address the challenges of climate change. This site details: where and by whom climate change funds are being developed; the scale of proposed and actual financing; and what countries, regions and types of projects the funds support. It allows easy sorting by fund and by country so you can get a full overview to support your work. Transparency International chapters have used this resource on many occasions to support their work.

THE UNDP/WORLD BANK CLIMATE FINANCE OPTIONS PLATFORM
www.climatefinanceoptions.org/cfo/node/189
This website provides information on the growing menu of climate funds that can be used to catalyse other sources for integrated investments in climate-resilient and low-carbon solutions. It also provides access to information about all aspects of climate finance for policy-makers and project planners in developing countries at national and city levels.

UNFCCC FINANCE PORTAL
www3.unfcc.int/pls/apexf?p=116:1:278986085391418::NO
This portal aims to assist state parties in tracking the financial mechanism of the Convention. It also provides information about the intergovernmental process under the Convention and informs relevant stakeholders about the mobilisation of resources to support developing countries in the implementation of adaptation and mitigation projects.
REPORTS:

**TRANSPARENCY INTERNATIONAL GLOBAL CORRUPTION REPORT: CLIMATE CHANGE**
www.transparency.org/whatwedo/publication/global_corruption_report_climate_change
The Global Corruption Report is the first comprehensive publication of its kind to explore the corruption risks related to tackling climate change. It was published in 2011. The report assesses specific corruption risks posed by governments spending unprecedented amounts through untested channels and often in countries with weak governance.

**GLOBAL LANDSCAPE OF CLIMATE FINANCE 2013 (CLIMATE POLICY INITIATIVE, 2013)**
The Landscape of Climate Finance 2013 report is the third edition of Climate Policy Initiative’s annual inventory of global and national climate finance flows.

This report presents the first comprehensive break-down of how multilateral climate finance has been spent in 135 countries over the last decade. It reviews the effectiveness of multilateral public climate finance and discusses whether the funds are making a difference in reducing emissions.

**GOING IN THE RIGHT DIRECTION? TRACKING ADAPTATION FINANCE AT THE SUBNATIONAL LEVEL**
The Adaptation Finance Accountability Initiative project seeks to improve accountability around adaptation finance. It does so by promoting the development and use of tracking tools, to collect evidence of where adaptation funds are going and the ease with which stakeholders can access information about adaptation projects. The initiative has initially focused on four countries, Zambia, Nepal, Uganda and the Philippines, in collaboration with CSOs in those countries.
**Related Q&A from Transparency International Helpdesk:**

*Our Anti-Corruption Helpdesk service meets the professional knowledge and research needs of a variety of stakeholders, from bilateral and multilateral donors to anti-corruption practitioners. Questions are answered within 10 working days in the form of short briefings, drawing on the expertise of our network of experts and practitioners.*

**U4: Corruption Risks in Climate Finance and Mitigating Approaches**


This report aims to improve the understanding of how fraud and corruption can pose a threat to the effectiveness and reputation of climate finance mechanisms, and how these risks can be mitigated. U4 have a wide variety of resources, particularly on REDD+ under their REDD Integrity area of work.

**Literature Review on the Linkages between Illegal Logging and Conflict**

[www.transparency.org/files/content/corruptionqas/Literature_review_on_linkages_between_illegal_logging_and_conflict_2014.pdf](www.transparency.org/files/content/corruptionqas/Literature_review_on_linkages_between_illegal_logging_and_conflict_2014.pdf)

This Helpdesk answer provides a list of resources on the linkages between illegal logging and conflict.

**Literature Review on Corruption Risks in the Forestry Sector in COMIFAC Countries**

[www.transparency.org/files/content/corruptionqas/Literature_Review_on_corruption_in_the_forestry_sector_in_COMIFAC_02.09.2014.pdf](www.transparency.org/files/content/corruptionqas/Literature_Review_on_corruption_in_the_forestry_sector_in_COMIFAC_02.09.2014.pdf)

This answer provides a non-exhaustive list of publications on corruption risks faced by Central African Forest Commission (COMIFAC) countries. Additionally, given that many of these risks are not country-specific, literature that addresses the problem from a broader perspective is also presented.

**Overview Review of Corruption Risks in REDD+ in the Congo Basin**


Literature review on the corruption risks in REDD+, with some examples from the Congo basin countries – in particular, Cameroon, the Democratic Republic of Congo, the Republic of Congo and the Central African Republic.

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**Guides:**
TRACKING ADAPTATION FINANCE
This guide is designed to help CSOs track climate change adaptation finance flows. It provides essential background information and describes a five-step process for tracking adaptation finance.

SECURING RIGHTS, COMBATING CLIMATE CHANGE
HOW STRENGTHENING COMMUNITY FOREST RIGHTS MITIGATES CLIMATE CHANGE
www.wri.org/securingrights
An analysis by the World Resource Forum of the growing body of evidence linking community forest rights with healthier forests and lower carbon dioxide (CO2) emissions from deforestation and forest degradation.

RESOURCES ON REDD+:

VOLUNTARY REDD+ DATABASE (THE REDD PARTNERSHIP)
www.reddplusdatabase.org
The Voluntary REDD+ Database provides information on REDD+ financing, actions and results that have been reported to the REDD+ Partnership. It aims to improve the effectiveness, efficiency, transparency and coordination of REDD+ initiatives, and to support efforts to identify and analyse gaps and overlaps in REDD+ financing.

REDDX (FOREST TRENDS)
http://reddx.forest-trends.org/
Forest Trends is working in 13 countries to track REDD+ finance from donors to in-country recipients and REDD+ projects on the ground. The countries assessed are: Brazil, Colombia, DRC, Ecuador, Ethiopia, Ghana, Guyana, Indonesia, Liberia, Mexico, Papua New Guinea, Peru, Tanzania and Vietnam.

CIFOR, ANTI-CORRUPTION POLICIES IN THE FOREST SECTOR AND REDD+
This book examines what REDD+ at the national level might look like in four areas: institutions and processes to build the REDD+ framework, broad policy reforms to enable REDD+ implementation, sectorial policies to change incentives, and demonstration activities to test and learn from different approaches.
The REDD Desk
http://theredddesk.org/countries
The REDD Desk is a database that provides information and analysis on REDD+ readiness. Based on in-country visits and local partner interviews it provides a detailed overview of national progress towards REDD+ readiness. In this way it is a priceless resource for those working on REDD+.
The countries assessed include: Bolivia, Cambodia, Cameroon, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Fiji, Ghana, Guatemala, Guyana, Indonesia, Kenya, Laos, Malaysia, Mexico, Nepal, Papua New Guinea, Peru, Republic of Congo, Sierra Leone, Solomon Islands, Sri Lanka, Tanzania, Vanuatu, Vietnam and Zambia.

Guidelines on Stakeholder Engagement in REDD+ Readiness with a Focus on the Participation of Indigenous Peoples and Other Forest-Dependent Communities
These Guidelines are designed to support effective stakeholder engagement in the context of REDD+ readiness for the Forest Carbon Partnership Facility and the UN-REDD Programme, with an emphasis on the participation of indigenous peoples and other forest-dependent communities.

UNDP, Staying on Track – Tackling Corruption Risks in Climate Change (2010)
This report identifies the corruption risks in relation to two elements of the climate change response of particular importance to developing countries: adaptation, and reducing emissions from deforestation and forest degradation in developing countries (REDD+).

CMI, Addressing Governance and Corruption Challenges for REDD: Initial Findings from DRC, Tanzania and Kenya
www.cmi.no/publications/publication/?3842=http-14iacc-org-programme-global-challenges-oppo
How might issues of corruption influence the success of schemes for REDD? How could REDD have a positive influence on addressing corruption in the forest sector? How are those responsible for REDD ensuring that issues of governance and corruption are addressed? The findings presented in this report come from a U4 study on governance and corruption challenges in schemes for REDD, including case reports on REDD in the DRC, Tanzania and Kenya.

REDD Integrity: Addressing Governance and Corruption Challenges in Schemes for REDD
This U4 report aims to add nuance to discussions about how donors might approach challenges of governance and corruption, with special reference to REDD schemes. This work resulted in a publication: "Assessing and monitoring forest governance: A user’s guide to a diagnostic tool".

ANNEX II: COUNTRY REPORTS: GOVERNANCE RISK ASSESSMENTS

MEXICO Six key underlying concerns have emerged from TI Mexico’s research. These are: 1) a lack of coordinated information exchange within the government apparatus, due to insufficient or incorrect archiving and classification systems; 2) climate data are covered by banking and or fiduciary secrecy regulations, even when public resources are involved; 3) no single institutional framework is in place which coordinates and monitors climate finance; 4) data available from different sources does not always match up, because there are no objective criteria to catalogue allocations made to deal with climate change; 5) lack of clarity both at central and local levels as to what criteria are used to allocate resources; and 6) information on climate finance flows is only available through the Ministry of Finance and Public Credit and is hard for the public to access. The full report can be found here.

BANGLADESH TI Bangladesh undertook research between 2011 and 2013 to analyse the current climate finance architecture and funding flows in Bangladesh. Six key underlying concerns emerged from TI Bangladesh’s research, namely: 1) the absence of any consolidated database of climate finance projects; 2) the Government of Bangladesh does not actively disclose certain pieces of information on climate finance; 3) there is a particular transparency deficit with regard to decision-making processes for climate finance allocation; 4) civil society involvement in climate finance policy development, decision-making processes and project monitoring is currently limited; 5) there is weak coordination between funding entities operating in Bangladesh; and 6) there is no system for the oversight and control of corruption. The full report can be found here.
KENYA Seven key underlying concerns have emerged from TI Kenya's research that need to be addressed: 1) climate funds are not well labelled in most government ministries and are not easily distinguishable from their core business; 2) ministries' low capacity to implement and report on climate activities and the absence of adequate enforcement of reporting obligations to the Treasury; 3) overlapping mandates pose challenges; 4) plans to devolve the implementation of climate change activities to the local level remain unclear; 5) capacity constraints of authorities; 6) information directly provided by CSOs to government is limited to the reporting they submit (if any) to the NGO Board, which often does not identify climate finance as separate from other donor investment; and 7) significant issues with regard to access to information at every level. The full report can be found here.

MALDIVES The following underlying concerns have emerged from TI Maldives' research, which should be addressed in order to ensure climate finance is spent effectively in the Maldives: 1) unclear reorganisation mechanisms for institutions and committees responsible for developing climate change policy and implementing climate change projects; 2) insufficient transparency in the decision-making criteria for projects, and for the selection of particular islands for different projects; 3) limited external monitoring of climate change projects; 4) no consistent national strategic monitoring framework; and 5) serious concerns regarding the availability of accurate and up-to-date information on the list of projects and their progress. The full report can be found here.

PERU Five key underlying concerns have emerged from TI Peru's research: 1) information on climate finance flows and accountability chains is dispersed, disordered at the national level; 2) the transparency and access to information required by national legislation in Peru is not fulfilled in relation to climate finance; 3) limited information in the public domain on CSO recipients of climate finance; 4) the national systems of monitoring and control are ill-equipped to ensure effective oversight and redress in cases of corruption in climate finance delivery; 5) national programme for climate change management is partly uncoordinated; 6) civil society participation in formal spheres is limited, and their degree of influence over decision-making processes is questionable. The full report can be found here.

DOMINICAN REPUBLIC Five key underlying concerns have emerged from TI Dominican Republic's research, namely: 1) information on climate finance flows and accountability chains is dispersed, incoherent or inaccessible at the national level; 2) contradictions in the definition and conceptualisation of climate finance; 3) issues with regard to access to information at every level; 4) lack of inter-institutional coordination and duality of functions between the two key climate change bodies in the country; and 5) majority of climate finance entering the Dominican Republic from external sources is managed by external agents acting in the country, rather than being channelled through the national budget. The full report can be found here.
ANNEX III

COUNTRY ASSESSMENTS FROM REDD+ CLEAN STEP-BY-STEP GUIDE

The Transparency International Keeping REDD+ Clean Step-by-Step Guide helps interested parties to understand and address corruption risks associated with forest carbon accounting – particularly REDD+ – programmes and strategies at the national level.

INDONESIA has some 130 million hectares of forest, which amounts to 68% of its land coverage – the third largest area of tropical rainforest in the world. Deforestation rates are extremely high, however – currently estimated at 1.17 million hectares per year, which makes Indonesia a high priority country under REDD+. In this context, estimates show that lowering the deforestation rate by 5% could generate REDD+ payments of US$765 million annually, and cutting it by 30% could amount to US$4.5 billion each year. As funding increases and readiness actions continue, the question remains as to whether sufficient care is being taken to insulate REDD+ against corruption. Indonesia scored a poor 32 on our 2012 Corruption Perceptions Index, which ranks countries on a scale of 0 (highly corrupt) to 100 (very clean) according to how corrupt their public sector is perceived to be. The country’s forestry sector has a particularly poor reputation for illegal activities and corruption, with estimated annual loses of US$36 billion to the national economy through fraud, tax avoidance and embezzlement. Given the potentially significant flows of money involved, these trends suggest significant threats to the success of REDD+ should effective anti-corruption safeguards not be built in now. To guide its advocacy efforts, Transparency International Indonesia undertook a corruption risk assessment for REDD+. This was not an assessment of concrete corruption cases, but focused on diagnosing risks so that they might be proactively addressed.

In conclusion, five key areas of concern emerged from the assessment and should be addressed in the future: 1) power relations, both between distinctive groupings – government, the private sector and civil society – and within groupings, such as between national and regional level governments; 2) inequalities in engagement between the different stakeholder groups; 3) information and knowledge asymmetries between elites and communities; 4) failures in enforcement; and, finally, 5) insufficient sanctions exist to effectively prevent and combat corruption. The full 2013 report can be found here.
PAPUA NEW GUINEA With 60% of the country’s surface area covered by forests, Papua New Guinea is home to the third largest area of intact tropical forests in the world. However, a well-established forestry sector concentrating on the extraction and export of logs contributes approximately US$297 million to the country’s national economy each year. Carbon, as an alternative commodity for trade, has recently been included in the government’s drive to promote environmentally sustainable economic growth. However, whilst REDD+ is seen as having enormous potential in Papua New Guinea, challenges may lie ahead. The country scored 25 out of 100 in our 2012 Corruption Perceptions Index. In an effort to maximise the potential of REDD+ funds, Transparency International Papua New Guinea has embarked upon a process to assess corruption risks in REDD+ and to address them proactively. The six key areas of concern that emerged during the analysis carried out between May 2011 and September 2012 were: 1) low capacity and motivation in relevant government departments/agencies was highlighted as a major cause of ineffective governance or corrupt abuse; 2) lack of enforcement; 3) high levels of illiteracy among landowners results in information asymmetries; 4) powerful or influential individuals might be in a position to ensure that policies are formulated according to their interests; 5) stakeholder consultations are a requirement under various national laws, but this is often ignored or inadequately addressed; and, finally, 6) there is a strong tendency towards opaque decision-making on land allocation, policy formulation and the allocation of funding. The full report can be found here.

VIETNAM With around 40% of the country covered by forest, Vietnam is a key target country for REDD+ investments. It has been estimated that the scheme could generate about US$80–100 million a year, equalling around half of the country’s annual health sector budget. REDD+ related finance began to flow into Vietnam in March 2009, when US$4.4 million was approved to implement the UN-REDD programme. However, whilst REDD+ is seen as having enormous potential as part of a global climate change strategy, challenges may lie ahead. Vietnam’s forestry sector has been beset with illicit activity in recent years. The country also scores a poor 31 on our 2012 Corruption Perceptions Index. The seven key underlying concerns that emerged from TI Vietnam’s analysis carried out between September 2011 and July 2012 are: 1) low capacity and motivation in relevant government departments/agencies; 2) poor transparency; 3) limitations on information disclosure; 4) overlapping laws; 5) entrenched cronyism; 6) failure on the part of the government to carry out broad, transparent and comprehensive stakeholder consultations; 7) the possibility of legal loopholes being exploited without detection. The full report can be found here.
ANNEX IV
COMPLAINTS AND INVESTIGATION MECHANISMS

The tables below provide a brief overview of different funds' independent and effective mechanisms to register and investigate complaints about corruption or fraud in the activities they support. To understand which tale is relevant in your context, we suggest you visit the Climate Funds Updates website, as set out above, and generate an overview of the funds entering your country.

**REDD+ FUNDS**

<table>
<thead>
<tr>
<th>FOREST CARBON PARTNERSHIP FACILITY</th>
<th>UN-REDD+</th>
<th>FOREST INVESTMENT PROGRAM (CIF)</th>
<th>GREEN CLIMATE FUND</th>
</tr>
</thead>
<tbody>
<tr>
<td>No facility-wide complaints and investigation mechanism, no facility-level referral system for complaints.</td>
<td>UNDP Policy on Fraud and other Corrupt Practices can be found <a href="#">here</a></td>
<td>No fund-wide complaints mechanism.</td>
<td>Independent Integrity Unit: to investigate allegations of fraud and corruption and</td>
</tr>
</tbody>
</table>
Use World Bank Complaint Mechanism: Report Suspected Fraud or Corruption

How to report a concern (three ways):
1. Submit an Online Integrity Complaint Form
2. Call: 1-202-458-7677 (24h hotline)
3. Download the free Integrity App

Use UNDP Complaint Mechanism:
UNDP Anti-Fraud Hotline. More information here.

Call +1-770-776-5678 worldwide (interpreters available 24 hours/day)
Call +1-877-557-8685 in the USA
Fax at +1-770-409-5008 worldwide

Also find further information on the audit and investigation guidelines as provided by UN Representatives of Internal Audit Services (RIAS) here. (p. 31–32)

Suspected fraud and corruption in CIF-financed operations can be reported through the accountability, integrity, and anti-corruption mechanisms of the multilateral development banks. Each bank has an independent compliance and project complaint mechanism, as listed here.

More information can be found here.

ADAPTATION FUNDS

PILOT PROGRAM FOR CLIMATE RESILIENCE (CIF)

No fund-wide complaints mechanism.

Suspected fraud and corruption in CIF-financed operations can be reported through the accountability, integrity, and anti-corruption mechanisms of the multilateral development banks. Each bank has an independent compliance and project complaint mechanism, as listed here.

ADAPTATION FUND

Complaints should be submitted to the Manager of the Adaptation Fund Board Secretariat, Marcia Levaggi
Email: mlevaggi@adaptation-fund.org
Tel: 1 (202) 473-6390
Fax: 1 (202) 522-3240

GLOBAL ENVIRONMENT FACILITY: LEAST DEVELOPED COUNTRIES FUND

Parties wishing to raise an issue or file a complaint are encouraged to send a formal request in the form of a letter or an email to:
Dr. Naoko Ishii,
Chairperson and Chief Executive Officer of the Global Environment Facility, the World Bank Group,
MSN G 6-602 - 1818 H Street, NW -Washington,

GREEN CLIMATE FUND

Independent Integrity Unit: to investigate allegations of fraud and corruption and other prohibited practices. An independent redress mechanism to address complaints related to fund operations will be established.

More information can be found here.
More Information can be found [here](#).

DC 20433-002.
Also, contact Mr. William Ehlers, Conflict Resolution Commissioner
Tel: +1 (202) 458 9436
Fax: +1 (202) 212 9553 -
Email: wehlers@thegef.org

### MITIGATION FUNDS

<table>
<thead>
<tr>
<th>SCALING UP RENEWABLE ENERGY IN LOW INCOME COUNTRIES (CIF)</th>
<th>CLEAN TECHNOLOGY FUND (CIF)</th>
<th>GLOBAL ENVIRONMENT FACILITY: SPECIAL CLIMATE CHANGE FUND</th>
<th>GREEN CLIMATE FUND</th>
</tr>
</thead>
<tbody>
<tr>
<td>No fund-wide complaints mechanism.</td>
<td>No fund-wide complaints mechanism.</td>
<td>See above.</td>
<td>Independent Integrity Unit: to investigate allegations of fraud and corruption and other prohibited practices. An independent redress mechanism to address complaints related to fund operations will be established.</td>
</tr>
<tr>
<td>Suspected fraud and corruption in CIF-financed operations can be reported through the accountability, integrity, and anti-corruption mechanisms of the multilateral development banks. Each bank has an independent compliance and project complaint mechanism, as listed <a href="#">here</a>.</td>
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<td></td>
<td>More information can be found <a href="#">here</a>.</td>
</tr>
</tbody>
</table>
CIVIL SOCIETY CONSULTATION

The tables below provide a brief overview of the policies in place that require different funds to actively consult with civil society in their decision-making processes. They also show ways how to get involved/engaged in consultation as a stakeholder, and provide relevant contact information.

REDD+

<table>
<thead>
<tr>
<th>FOREST CARBON PARTNERSHIP FACILITY</th>
<th>UN-REDD+</th>
<th>FOREST INVESTMENT PROGRAM (CIF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Forest Carbon Partnership Facility, together with the UN-REDD Programme, released principles and guidance for effective stakeholder engagement in April 2012. This document also sets out eight practical steps for how to conduct individual consultations. UN agencies and development banks operating in-country should use this resource to guide their consultations.</td>
<td></td>
<td>Global level: some CSOs are able to participate in the Funds’ Partnership Forum, which is intended to be a forum for information exchange and lessons learned. As such, it provides a venue for consulting with civil society stakeholders, although it does not lead to written outcomes. National level: multilateral development banks and host country governments are expected to engage with relevant domestic stakeholders, including civil society, during the preparation of investment plans.</td>
</tr>
</tbody>
</table>

Further information can be found here.

ADAPTATION FUNDS

<table>
<thead>
<tr>
<th>PILOT PROGRAM FOR CLIMATE RESILIENCE (CIF)</th>
<th>ADAPTATION FUND</th>
<th>GLOBAL ENVIRONMENT FACILITY: LEAST DEVELOPED COUNTRIES FUND</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information on CSO consultation policies can be found here.</td>
<td>Implementing entities must consult stakeholders when preparing project proposals. Once a project proposal has been received by the Fund Board, it is published on the Fund’s website. However, the Fund’s policy is</td>
<td>GEF-CSO Network: At the global level, the Fund has a formal mechanism for consulting annually with civil society.</td>
</tr>
</tbody>
</table>

Dedicated Grant Mechanism for Indigenous Peoples and Local Communities: provides grants to indigenous peoples and local communities in-country or in regional pilots to support their participation in the development of the Forest Investment Program investment strategies, programmes and projects. More information can be found [here].

It is possible to get involved in the [Adaptation Fund Network](#), which is a coalition of NGOs and interested stakeholders who follow the development of the Adaptation Fund and its funded projects.

Expanded Constituency Workshop: These workshops aim at keeping the Global Environment Facility’s national focal points, convention focal points and other key stakeholders, including civil society, abreast of the Facility’s strategies, policies and procedures, and to encourage coordination.

MITIGATION FUNDS

SCALING UP RENEWABLE ENERGY IN LOW INCOME COUNTRIES (CIF)

Information on CSO consultation policies can be found [here].

Dedicated Grant Mechanism for Indigenous Peoples and Local Communities: provides grants to indigenous peoples and local communities in-country or in regional pilots to support their participation in the development of the Forest Investment Program.

According to the guidelines for the Clean Technology Fund and Strategic Climate Fund programmes, a draft of the investment plan should also be made available for public information and comment on a government website at least two weeks prior to its finalisation. No guidelines regarding more active consultation exist.

GLOBAL ENVIRONMENT FACILITY: SPECIAL CLIMATE CHANGE FUND

[GEF-CSO Network](#): At the global level, the Fund has a formal mechanism for consulting annually with civil society.

[Expanded Constituency Workshop](#): These workshops aim to keep the Facility’s national focal points, convention focal points and other key stakeholders, including civil society, abreast of its
OBSEVER PARTICIPATION

The tables below provide a brief overview of the policies and procedures to enable independent civil society actors to participate meaningfully in the proceedings of climate funds. They also show if civil society actors, in their roles as observers, have fair access to meetings through a clear selection or registration procedure.

REDD+ FUNDS

<table>
<thead>
<tr>
<th>FOREST CARBON PARTNERSHIP FACILITY</th>
<th>UN-REDD</th>
<th>FOREST INVESTMENT PROGRAM (FIP)</th>
<th>GREEN CLIMATE FUND</th>
</tr>
</thead>
<tbody>
<tr>
<td>Two representatives from civil society – one from the North and one from the South – and one representative of forest-dwelling communities are selected as observers to the Facility.</td>
<td>Four members of civil society and four representatives of indigenous peoples’ organisations are selected as observers to the Programme through a self-selection process facilitated by the Secretariat and the Participating UN Organisations (elections take place every two years). Some information can be found here, although it is out-dated.</td>
<td>In February 2015 the Climate Investment Fund added its third round of civil society observers to its governing body. Seventeen observers were chosen through a process of self-selection; this process was facilitated by an independent organisation, RESOLVE, based in Washington D.C., and through the assistance of an Advisory Committee comprised entirely of CSOs.</td>
<td>Information can be found here.</td>
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<td>More information on who the official representatives are can be found here.</td>
<td>List of representatives:</td>
<td></td>
<td>Active observers are invited to participate in board meetings. They are two representatives of accredited CSOs and two representatives of accredited private sector organisations. These were</td>
</tr>
</tbody>
</table>
Representatives of organisations other than those expressly set out in the Charter can be invited to participate as observers in Participants’ Committee meetings by the Facility Management Team.

<table>
<thead>
<tr>
<th>Representative</th>
<th>Role</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chris Meyer</td>
<td>Northern CSO representative</td>
<td><a href="mailto:cmeyer@edf.org">cmeyer@edf.org</a></td>
</tr>
<tr>
<td>Robert Chimambo</td>
<td>Africa CSO representative</td>
<td><a href="mailto:kchimambo@gmail.com">kchimambo@gmail.com</a></td>
</tr>
<tr>
<td>Gustavo Sanchez</td>
<td>Latin America CSO representative</td>
<td>Gustavo Sánchez <a href="mailto:svallategusto@gmail.com">svallategusto@gmail.com</a>, <a href="mailto:gmocaf@enfinittum.com">gmocaf@enfinittum.com</a> Tek Vannara</td>
</tr>
</tbody>
</table>

The list of representative focal points can be found [here](#). Identified through a self-selection process. Representation is for a term of two years, with a maximum of two consecutive terms.

A list of observers can be found [here](#).

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**ADAPTATION FUNDS**

**PILOT PROGRAM FOR CLIMATE RESILIENCE (CIF)**

In February 2015 the Climate Investment Funds added its third round of civil society observers to its governing body. Seventeen observers were chosen through a process of self-selection; this process was facilitated by an independent organisation, RESOLVE, based in Washington D.C., and through the assistance of an Advisory Committee comprised entirely of CSOs.

**ADAPTATION FUND**

Any civil society observer can participate in board meetings so long as they are a member or associate of an organisation, which is accredited to the UNFCCC. They need to register online in advance to be able to participate in the meeting. However, access is not guaranteed. Board meetings are, in principle, open to attendance by observers, unless the board decides that a meeting or part of a meeting will be closed.

**GLOBAL ENVIRONMENT FACILITY: LEAST DEVELOPED COUNTRIES FUND**

Civil society members who attend council meetings are accredited through the GEF-CSO Network, according to its clear criteria and application process.

The Chief Executive Officer invites five NGO representatives to attend the council meetings (except executive sessions), and five NGO representatives to observe council discussions in an over-flow room.

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**GREEN CLIMATE FUND**

See above
The list of representative focal points can be found here.

A list of accredited observer organisations and representatives can be found here.

Council documents are made available online six to eight weeks before the meeting. Funding is also made available by the Facility for civil society from developing countries to attend council meetings.

CSOs are able to participate in Fund/Special Climate Change Fund (SCCF) council meetings – but as observers rather than decision-makers.

Here you can find the election results for regional focal points.

Here you can find information on the public involvement policy.

**MITIGATION FUNDS**

<table>
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<th>CLEAN TECHNOLOGY FUND (CIF)</th>
<th>GLOBAL ENVIRONMENT FACILITY: SPECIAL CLIMATE CHANGE FUND</th>
<th>GREEN CLIMATE FUND</th>
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**ANNEX V**

**MAJOR GLOBAL CSO NETWORKS**
<table>
<thead>
<tr>
<th>NETWORK</th>
<th>DESCRIPTION OF NETWORK</th>
<th>WHAT DO THEY DO?</th>
</tr>
</thead>
<tbody>
<tr>
<td>GEF-CSO NETWORK</td>
<td>The network is made up of Global Environment Facility-accredited organisations whose work in environment and sustainable development is aligned with the Facility’s mandate.</td>
<td>The network currently links member organisations in all regions of the world. Its role is expanding from focusing mainly on input to Facility planning and policy-making to one of empowering the engagement of civil society in the plantation of Facility programmes.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Newsletter: The network produces a quarterly e-newsletter to keep members and others updated on GEF-CSO network activities, news from the network regions and indigenous peoples focal points, news on the Facility and upcoming events.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>MEMBERSHIP BENEFITS</td>
</tr>
<tr>
<td></td>
<td>Being a GEF-CSO network member provides an exclusive opportunity for your organisation to contribute towards better funding and policy outcomes related to the Facility, and to be part of a global network of NGOs where you will be able to share ideas and experiences with other NGOs.</td>
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<td>HOW TO JOIN</td>
</tr>
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<td>Organisations interested in becoming members of the network need to apply for membership by submitting an application form together with the necessary documentation to the network. All necessary information can be found here.</td>
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The network directly supports NGOs in a number of developing countries, with a focus on direct access countries, by increasing their capacity to follow up relevant issues around the implementation of the project throughout the implementation period.

MEMBERSHIP BENEFITS

Member organisations regularly receive the Adaptation Fund NGO newsletter and have the opportunity to contribute articles to it. Resources, such as publications relevant to the Fund, can be presented on the fund’s website. There are no membership fees.

HOW TO JOIN

The Adaptation Fund NGO network is open to any NGO or stakeholder interested in the Fund or the network

If you want to become a member of the network, you should fill in the application for membership that can be found here.

To join the GCF CSO list and receive updates on the Green Climate Fund, you should subscribe to the Google Group: https://groups.google.com/forum/#!forum/gcf-cso-list

The Climate Action Network is a worldwide network of over 900 NGOs in more than 100 countries working to promote government and individual action to limit human-induced climate change to ecologically sustainable levels. The Network’s Finance Group coordinates advocacy and policy work around the need to rapidly scale up support for climate action directly from developed countries and through new, innovative sources of finance.

HOW TO JOIN

Any NGO working on climate issues is eligible to join the Network. Transparency International is already an official member.
### OPEN GOVERNMENT PARTNERSHIP

The Open Government Partnership was launched in 2011 to provide an international platform for domestic reformers committed to making their governments more open, accountable, and responsive to citizens.

Information on how to join the Partnership can be found [here](#).

### REGIONAL CSO NETWORKS

**AFRICA:**

- The Congo Basin Forest Partnership brings together around 70 partners, including African countries, donor agencies and governments, international organisations, NGOs, scientific institutions and the private sector. More information can be found [here](#).
- COMIFAC – the Central African Forests Commission was formed in 1999 in order to protect the Congo basin forest ecosystems. More information can be found [here](#).
- Pan African Climate Justice Alliance (PACJA) is a civil society platform for climate change and sustainable development, with a membership of more than 1000 organisations and networks. More information can be found [here](#).
- RIFFEAC (Réseau des Institutions de Formation Forestière et Environnementale d’Afrique central) is a network of forest and environmental high schools and technical schools in central Africa. More information can be found [here](#).
- The Congo Basin Forest Fund (seeks to address the challenges associated with climate change by reducing and eventually reversing the rate of deforestation in the Congo basin forests, and to alleviate poverty. More information can be found [here](#).
- Commonwealth Africa Anti-Corruption Centre:  
  Contact: Governance and Institutional Development Division  
  Commonwealth Secretariat  
  Email: r.koranteng@commonwealth.int  
  More information can be found [here](#).
- **The African Wildlife Foundation** is an international conservation NGO focusing solely on protecting African wildlife and landscapes. The Foundation works to reduce concentrations of greenhouse gas emissions in ecosystems by encouraging landscape-scale conservation, sound forest management, avoiding deforestation, and range rehabilitation, through appropriate carbon payment mechanisms. More information can be found [here](#).
- Moreover, global organisations such as Hans Böckler Foundation (HBS), Center for International Forestry Research, the World Wide Fund for Nature (WWF), Oxfam, etc. have regional offices and regional observers relating to climate funds with whom it might be advisable to get in touch.

**LATIN AMERICA:**

- *Grupo de Financiamiento Climático para América Latina y el Caribe (GFLAC):* These are CSO members of the Latin American and the Caribbean Climate Finance Group (GFLAC) in Argentina, Chile, Ecuador, Mexico, and Peru who are mapping information about climate finance flowing both, from international cooperation and from national public sources, in order to improve transparency – but mainly in order to build a robust system to monitor, report and verify the effective use of climate finance.

**ASIA PACIFIC**

- *RECOFTC (The Center for People and Forests)* is an international organisation with a vision of local communities actively managing forests in Asia and the Pacific to ensure optimal social, economic, and environmental benefits.