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LDCF/SCCF Council
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Washington D.C.

Agenda Item 5

UPDATED OPERATIONAL GUIDELINES FOR THE LEAST DEVELOPED COUNTRIES FUND

Recommended Council Decision

The LDCF/SCCF Council, having reviewed document GEF/LDCF.SCCF.13/04, Updated Operational Guidelines for the Least Developed Countries Fund, Submitted for LDCF/SCCF Council Approval, approves this document, including the discontinuation of use of the sliding-scale option in estimating the additional costs of development imposed by adaptation.

Executive Summary

The purpose of the "Updated Operational Guidelines for the Least Developed Countries Fund" is to provide a consolidated set of operational guidelines, with the relevant updates, on financing the implementation of the National Adaptation Programs of Action (NAPAs) under the Least Developed Countries Fund (LDCF). The original operational guidelines, included in the document "Programming Paper for Funding the Implementation of NAPAs under the LDC Trust Fund", GEF/C.28/18, were adopted by the Council in 2006. Since that time, additional guidance has been issued by the United Nations Framework Convention on Climate Change (UNFCCC) at its Conferences of the Parties (COP), some operational guidelines have become obsolete due to a better understanding of how to define adaptation and estimate its costs, and new operational modalities have been approved for the GEF Trust Fund that have particular relevance for the operations of the LDCF.

Notably, the COP has requested the GEF to:

(a) Continue to provide information to the LDCs to further clarify project baselines and the application for accessing funding from the LDCF in order to develop and implement projects under NAPAs to address the effects of climate change; [1]

(b) Clarify the concept of additional costs as applied to different types of adaptation projects under the Least Developed Countries Fund and the Special Climate Change Fund which seek to respond to climate change risks;[2]

(c) Support the development of a programmatic approach for the implementation of NAPAs by those LDC Parties that wish to do so;[3]

(d) Further explore opportunities to streamline the LDCF project cycle, particularly during the project preparation stage;[4] and,

(e) Further improve the provision of information to LDCs on the project development process for projects being considered under the LDCF;[5]

In response to the requests by the COP, the GEF Secretariat prepared an information document for the LDCF/SCCF Council of June 2012, where the concepts of baseline projects, co-financing and additional cost, as applied in the context of projects and programs financed under the LDCF, as well as adaptation projects financed under the SCCF, are clarified.[6] The document serves to further improve the provision of information to LDCs on the project development process for NAPA implementation.

Among the operational modalities that have become obsolete with practice, this document takes note that the sliding scale approach to estimate the costs of adaptation at an early stage of project design is no longer used as project proponents are now able to calculate the costs of adaptation, and therefore the modality has been phased out.

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[1] Decision 9/CP.17
[2] Decision 11/CP.17
[3] Decision 9/CP.17
[4] Decision 9/CP.17
[5] Decision 9/CP.17
[6] LDCF/SCCF Council document GEF/LDCF.SCCF.12/Inf.04 (May 2012). Available at <http://www.thegef.org/gef/sites/thegef.org/files/documents/Clarification%20on%20Additional%20Cost%208%20May.pdf>.

As the LDCF applies all rules and operational modalities of the GEF, unless the LDCF/SCCF Council says otherwise, all new modalities that have been introduced to the GEF since 2006 – except the System for Transparent Allocation of Resources (STAR) – apply to the LDCF. In particular, the introduction of new modalities on programmatic approaches and on direct access is highlighted for their specific relevance to the LDCF operations.

The GEF is currently subject to an ongoing broader effort to streamline the project cycle, as well as the processes and procedures for accessing resources under the GEF, which were initiated by the decision of the GEF Council in June 2012. These processes will automatically apply to LDCF – unless the LDCF/SCCF Council decides otherwise – and this is expected to result in a further-streamlined LDCF project cycle.

The document "Updated Operational Guidelines for the Least Developed Countries Fund" is intended to serve as a reference for LDCF stakeholders and to update and complement existing documents that discuss the operations of the LDCF, and thus assist in the provision of information to LDCs on the project development process for NAPA implementation.

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INTRODUCTION

1. The Least Developed Countries Fund (LDCF) was established under the United Nations Framework Convention on Climate Change (UNFCCC) at its seventh session in Marrakech and is managed by the Global Environment Facility (GEF). The fund addresses the special needs of the 49 LDCs which are especially vulnerable to the adverse impacts of climate change. As a priority, the LDCF supports the preparation and the implementation of the National Adaptation Programs of Action (NAPAs), country-driven strategies which identify urgent and immediate needs of LDCs to adapt to climate change.

2. When the LDCF was established by the UNFCCC Conference of Parties (COP) at its 7th Session in 2001, the COP asked the GEF to manage the LDCF, with the World Bank as the Trustee. The GEF receives guidance from and reports to the UNFCCC COP. The governing body of the LDCF is the LDCF/SCCF Council which meets two times a year.

3. In response to decisions[7] at the 9th and 11th Sessions of the COP in 2003 and 2005, respectively, concerning the guidance to the GEF with respect to funding the implementation of the NAPAs under the LDCF, the GEF prepared the document "Programming Paper for Funding the Implementation of NAPAs under the LDCF Trust Fund."[8] The document was prepared in consultation and collaboration with the LDCs, donor countries that contribute to the LDCF, other interested Parties and constituencies, the Implementing and Executing Agencies, and the UNFCCC Secretariat. The LDCF programming paper was approved by the GEF Council in May 2006.

4. The document Programming Paper for Funding the Implementation of NAPAs under the LDCF Trust Fund comprises all elements listed above in the guidance from the COP. The LDCF is administratively separate from the GEF Trust Fund and operates through its own set of rules and procedures. While the LDCF largely follows the GEF Trust Fund operational model, its rules and procedures include innovative elements linked to the unique circumstances of the LDCs based upon specific COP guidance.

5. In particular, the innovative elements were reflected in the following principles:

  a. The concept of additional costs of adaptation;
  b. A sliding scale as a tool to simplify project submissions and costs calculations;
  c. Existing development funds as basis for co-financing;
  d. Option for full cost funding for adaptation; and
  e. Expedited project cycle, including
    i. MSPs up to US$2 million;
    ii. Submission of projects on a rolling basis (as opposed to fixed dates and deadlines);
    iii. No objection-based approval: four written objections are required to stop (projects cannot be vetoed by a single Council Member);
    iv. Faster access to GEF/LDCF funding.

[7] 3/CP.11 and 6/CP.9
[8] GEF/C.28/18.

6. These principles have set the programming under the LDCF apart from the programming under the GEF Trust Fund. LDCF projects are not funded on the basis of incremental costs. They provide resources to meet the "additional costs" that are superimposed on development costs to reduce the impacts of climate change and increase resilience. They are not expected to deliver global environmental benefits. They are aimed at generating adaptation benefits. The resources under the LDCF are outside the Resources Allocation Framework (RAF) and System of Transparent Allocation of Resources (STAR) as their parameters are not relevant in the context of adaptation to climate change. They are processed and approved through a simplified and streamlined project cycle. The programming modalities of the LDCF will be kept under review and revised as necessary to take into account evolving guidance from the COP on the LDCF, advice from the LDC Expert Group and lessons learned in financing the implementation of NAPAs.

Table 1: Main differences between LDCF/SCCF and GEF Trust Fund[9]

	GEF Trust Fund	LDCF	SCCF
Project must generate global environmental benefits	Yes	No	No
Project must generate adaptation benefits	No	Yes	Yes
Funding allocated according to RAF or STAR	Yes	No	No
Projects financed according to the "incremental cost" principle	Yes	No	No
Project proposals approved on a rolling basis	No	Yes	No
Funding of projects according to "balanced access"	No	Yes	No
Ceiling for Medium-sized Project[10]	$1m	$2m	$1m

7. These principles were established at a time when the LDCF was in the early stages of NAPA implementation. The Programming Paper of 2006 refers to providing support to 44 NAPAs and 2 global support projects. At this time, 47 NAPAs have been completed, and 133 projects from 45 countries have already applied for funding and are in various stages of project cycle, including implementation.

8. In addition, more recent guidance, namely at COP 17, requests the LDCF and helping identify the "additional" costs of climate adaptation projects as well as to clarify project baselines, support the development of a programmatic approach, and explore opportunities for streamlining the LDCF project cycle.

[9] Adopted from "Accessing Resources under the LDCF" and "Accessing Resources under the SCCF".
[10] As of 10/10/2012

9. The document Programming Paper for *Funding the Implementation of NAPAs under the LDCF Trust Fund* is therefore being revised in order to provide a consolidated set of operational guidelines, with the relevant updates, on financing the implementation of the NAPAs under the LDCF, to providing a comprehensive reference guide to the key concepts, policies and procedures associated with developing projects and programs under the LDCF.

Recent COP Guidance

10. The programming principles of the LDCF, as reflected in the Programming Paper of 2006, and as summarized above, have been established in response to the guidance received over time from the COP since the inception of the fund. The main pillars of the guidance to the GEF that has directed key operational commitments to finance the implementation of the NAPAs under the LDCF since its inception are summarized in Annex 1.

11. Since that time, additional guidance has been provided by the COP to the GEF. At COP 17 in 2012, in decision 9/CP.17 on "*Least Developed Countries Fund: support for the implementation of elements of the least developed countries work program other than national adaptation program of action (NAPAs),*" paragraph 1, the COP requested the GEF, "as an operating entity of the financial mechanism of the Convention entrusted with managing the LDCF:

a. To continue to provide information to the LDCs to further clarify project baselines and the application for accessing funding from the LDCF in order to develop and implement projects under NAPAs to address the effects of climate change;
b. To support the development of a programmatic approach for the implementation of NAPAs by those LDC Parties that wish to do so;
c. To further explore opportunities to streamline the LDCF project cycle, particularly during the project preparation stage;
d. To further improve the provision of information to LDCs on the project development process for projects being considered under the LDCF."

12. In decision 11/CP.17 on "*Report of the GEF to the COP and additional guidance to the GEF*," paragraph 1, the COP requested the GEF, "as an operating entity of the financial mechanism of the Convention:

a. To clarify the concept of additional costs as applied to different types of adaptation projects under the Least Developed Countries Fund and the Special Climate Change Fund which seek to respond to climate change risks[.]"

Updated Operational Guidelines -- Key Concepts and Criteria

13. The NAPA implementation phase may begin once the NAPA preparation phase has been completed. The NAPA preparation phase is considered complete when the NAPA official report is finalized and made public. The NAPA implementation phase includes the design, development, and implementation of projects on the ground. Throughout the implementation phase, projects will be monitored to measure progress, and at project completion, a terminal evaluation will be required to assess the effectiveness of the adaptation measures implemented.

14. The implementation phase should include provision for involving a comprehensive and open group of stakeholders. The implementation phase requires not only the mobilization of significant additional resources but also the identification and involvement of key agencies, individuals, communities and entities with relevant expertise to address the problems given priority in the NAPA report.

15. Decision 6/CP.9 calls upon the LDCF to support the implementation of NAPAs as soon as possible after their completion. Nearly all LDCs have completed their NAPAs at this time.

16. Analysis of the priorities in the NAPAs have shown that the following sectors are prioritized:

a. Food Security and Agriculture (28%);
b. Early Warning and Disaster Risk (16%);
c. Coastal Management (15%);
d. Ecosystem based Adaptation (15%);
e. Water Resources Management (14%);
f. Capacity Building (6%);
g. Health (4%); and,
h. Energy (2%).

PROJECT ELIGIBILITY CRITERIA FOR NAPA IMPLEMENTATION

17. The LDCF eligibility criteria for granting funds for the implementation of the NAPA under the LDCF remain unchanged since the Programming Paper of 2006, and are as follows:

a. The participating country must be eligible. The country must be currently classified as LDC and must have completed its NAPA;[11]
b. The project must be endorsed by the operational focal point.
c. Project or program must be consistent with country priorities, as identified in the NAPA;
d. Project or program must be in line with the LDCF/SCCF Strategic Objectives;
e. The proposal, including the amount, must reflect the GEF dialogue with country;
f. The proposal must be designed through a participatory approach, including multi-stakeholders consultations;
g. The project must include an estimate of the adaptation costs (additional costs) and report about the costs of a business-as-usual scenario (baseline costs); and,
h. The project must deliver adaptation benefits.

[11] The process for deriving NAPAs is highly consultative and the prioritization process relies on the following criteria (as per Decision 28/CP.7):“Criteria for selecting priority activities...15. A set of locally-driven criteria will be used to select priority adaptation activities. These criteria should include, inter alia: (a) Level or degree of adverse effects of climate change; (b) Poverty reduction to enhance adaptive capacity; (c) Synergy with other multilateral environmental agreements; (d) Cost-effectiveness....16.These criteria for prioritization will be applied to, inter alia: (a) Loss of life and livelihood; (b) Human health; (c) Food security and agriculture; (d) Water availability, quality and accessibility; (e) Essential infrastructure; (f) Cultural heritage; (g) Biological diversity; (h) Land-use management and forestry; (i) Other environmental amenities; (j) Coastal zones, and associated loss of land.”

RESOURCES AVAILABILITY

18. According to UNFCCC decision 6/CP.9, the LDCF is to apply a principle of Equitable Access by least developed country Parties to funding for the implementation of national adaptation programs of action. In the GEF LDCF programming paper (GEF/C.28/18), which is again based on further guidance in decision 3/CP.11, this principle of equitable access has been translated into a concept of balanced access.

19. The balanced access principle assures that funding for NAPA implementation will be available to all LDCs, and not be awarded on a first-come, first-served basis (which could favor countries with higher institutional capacity for project development, leaving out the most vulnerable LDCs).

20. Consistent with the balanced access principle, the LDCs have agreed on imposing a "ceiling," or a maximum amount that will not be exceeded, in order not to deplete the limited LDCF resources. In principle, a portion of all funding available is reserved for each LDC. As donors contribute to the fund on an annual basis and at different times, the "ceiling" increases proportionately to the growing size of the fund.

CLARIFICATION OF PROJECT BASELINES[12]

21. The concept of "project baselines" remains unchanged since the Programming Paper of 2006 and is clarified here in response to recent COP guidance. The definition and clarification of the project baselines, in the context of LDCF, are adopted from the document "Guidelines for Project Financing," GEF/C.41/Inf.04.

22. For the purposes of the LDCF, the guidelines on project baselines provided in that document can be interpreted as follows:

a. Before proposing a project for LDCF financing, the first step is to assess the baseline situation and projects. The baseline project refers to the set of relevant existing or planned initiatives and resources, which are funded by, or proposed to be funded by non-GEF[13] funding, and which will be leveraged by the LDCF. Estimates can be made for the dollar amount of expected/projected adaptation benefits forgone in the absence of the LDCF, i.e. if left unattended without GEF intervention.

b. During the concept preparation, the Project Identification Form (PIF) or the Program Framework Document (PFD) should provide an overview of this business-as-usual scenario, and explain what happens or what is expected to happen without financing provided by the LDCF.

[12] The concept discussed here is different from baseline information or data for a project, the latter being a critical component of the LDCF/SCCF Results Based Management framework. Baseline information or data are discussed in detail in document "Updated Results-Based management Framework for the Least Developed Countries fund and the Special Cliamte Change Fund and Adaptation Monitoring and Assessment Tracking Tool" GEF/LDCF.SCCF.9/Inf.4 and "AMAT Guidelines", available at http://www.thegef.org/gef/tracking_tool_LDCF_SCCF

[13] "GEF" includes GEF Trust Fund, LDCF, and SCCF funding here.

c. The analysis of the business-as-usual scenario (BAU) should provide quantitative estimates of the baseline project which may include the set of baseline activities that should have been fully funded and implemented by the government or other financing sources. In other words, BAU refers to activities that would be implemented also in absence of climate change, also referred to as baseline activities. Examples of baseline activities include:

    i. Development projects in water, agriculture, disaster risk management, Integrated Coastal Zone Management, urban sector, tourism, health, etc.
    ii. Government-endorsed strategies and policies;
    iii. Government announced investments in programs and infrastructure
    iv. Legislative frameworks;
    v. Accords, treaties and agreements; and
    vi. International funding lines from bilateral and multilateral agencies.

Clarification of Cofinancing

23. The meaning of "cofinancing" remains unchanged since the Programming Paper of 2006 and is clarified further in response to recent COP guidance. In the context of the LDCF, cofinancing has a very specific definition. It refers primarily to the financing associated with the baseline project and any non-LDCF financing associated with the adaptation project, committed as part of the initial financing package.

24. Financing for activities that are not essential for achieving LDCF objectives, i.e., not part of the baseline project, but are part of the overall project package are not counted as cofinancing.

25. Cofinancing can be provided from different sources: (i) the GEF Agency; (ii) governments; (iii) other multilateral agencies, bilateral development cooperation agencies; (iv) the private sector; (v) private foundations, civil society organizations, and (v) beneficiaries.

26. Cofinancing could be employed through a variety of instruments: (i) grants; (ii) credits; (iii) loans at concessional or market rates; (iv) equity investments; and (v) others.

CLARIFICATION OF ADDITIONAL COST

27. The meaning of the "additional cost" remains unchanged since the Programming Paper of 2006 and is clarified further in response to recent COP guidance. The LDCF is aimed at financing the full cost of adaptation. More specifically, the LDCF finances urgent and immediate adaptation actions that reduce vulnerability and increase adaptive capacity to the impacts of climate change. Yet, adaptation and development are closely linked. LDCF programming paper and COP decisions have captured this with the following terms and concepts.

28. The full adaptation cost translates into the term "additional cost" in COP decisions and LDCF programming paper. This concept is used to explain how the costs of adaptation are added to costs of BAU development. The full costs of adaptation are fully paid by the LDCF or SCCF. The rationale behind this concept is to use the LDCF and SCCF funds to integrate adaptation to climate change in the context of a development intervention. In this case, BAU development financing – that can include development assistance (bilateral or multilateral), government budget lines, and NGO and community groups contributions, in cash/grant, loan, soft-loan, or in-kind form – can be topped up with LDCF and SCCF financing to mainstream adaptation into investment projects. This approach has the potential of having a greater impact, taking advantage of synergies and achieving the benefits of the economies of scale.

29. As the LDCF and SCCF fund the full cost of adaptation, they can also fund standalone projects, provided that what is being financed are shown to be exclusively adaptation interventions, which are not linked to BAU development.

30. In summary, the concept of additional cost, in the context of LDCF and SCCF, is the amount of funding necessary to implement adaptation measures that would not be necessary in absence of climate change.

31. The clarification of the Additional Cost Concept was provided in an eponymous document GEF/LDCF.SCCF.12/Inf.04 at the LDCF/SCCF Council of May 2012.

Phase-out of the Sliding Scale

32. The concept of the "sliding scale", captured in the Programming Paper of 2006, is no longer valid. The sliding scale concept was previously implemented as an optional device for determining the appropriate amount of funding based on the size of the baseline project, or BAU development financing. As clarified in the Programming Paper, the limited experience of implementing adaptation interventions and scenarios, and a lack of examples of similar activities to draw upon at that time was recognized, which is why the sliding scale was provided in order to assist in the process of project development.

33. However, given the development and growth of experience in the design and implementation of adaptation projects since then, and since evidence shows that sliding scale is no longer in active use, this option is no longer necessary. Instead, the additional cost will be assessed based on the comparison of the cost of BAU development to the estimated cost of climate-resilient development, or other project-appropriate means.

MODALITIES

Streamlined LDCF Project Cycle

34. As elaborated in the Programming Paper of 2006, the LDCF has already several streamlining features that distinguish it from the GEF project cycle, including:

i. MSPs up to US$2 million;
ii. Submission of projects on a rolling basis (as opposed to fixed dates and deadlines);

iii. No objection-based approval: four written objections are required to stop (projects cannot be vetoed by a single Council Member);
iv. Faster access to GEF/LDCF funding.

35. These features continue to remain valid.

36. In addition, the GEF is in the process of streamlining further its project cycle. GEF streamlining measures will by default apply to the LDCF project cycle. Any streamlining measures over and above those that already apply to LDCF (namely those described in the previous paragraph) are expected to help expedite the processing of LDCF projects.

37. COP guidance, notably in decision 9/CP.17, requests "[t]o further explore opportunities to streamline the LDCF project cycle[.]" Given LDCF/SCCF governance structure, the LDCF/SCCF Council can consider further streamlining measure of the LDCF project cycle, taking LDCF's unique mandate into account, after the completion of the current round of GEF streamlining effort, addressing any gaps or opportunities specific to the LDCF, as appropriate.

Programmatic Approach for NAPA Implementation

38. All the policies and procedures that apply under the GEF Trust Fund apply by default to the LDCF, except when the LDCF/SCCF Council decides otherwise. This includes the GEF's programmatic approach as elaborated in GEF Project and Programmatic Approach Cycles (November 2010, GEF/C.39/Inf.03.)

39. The overall objective of the programmatic approach is to secure a larger-scale and sustained impact in adaptation by implementing medium to long-term strategies for achieving specific adaptation objectives that are consistent with National Adaptation Programs of Action of recipient countries. By working through programmatic approaches, the LDCF aims to disburse large-scale LDCF resources effectively and efficiently to countries and regions with enhanced accountability and oversight.

40. Moreover, programs can provide an opportunity for interested donors or other partners (including the private sector) to invest additional, focused funding that seeks to achieve the same impacts.

41. At this time, the LDCF/SCCF Council has not, to date, made any exceptions to the Programmatic Approach policies and procedures, and as a result, the LDCF follows the same programmatic approach as the GEF, and as described in the aforementioned document GEF/C.39/Inf.03.

Direct Access and Broadening of GEF Partnership

42. In May 2011, under the provisions of paragraph 28 of the GEF Instrument, the GEF Council decided to broaden its partnerships by approving the policies, procedures, and criteria for a pilot on accrediting new institutions to serve as GEF Partners for the implementation of GEF projects. The expansion of the GEF Partnership aims at enhancing country ownership

within the GEF and to give recipient countries greater choice in terms of agencies with which they work. Accreditation of national agencies as GEF Project Agencies will also allow them to enhance their capacity in terms of project implementation.

43. The new agencies to be accredited under this reform will be referred to as GEF Project Agencies. Upon accreditation, GEF Project Agencies will be entitled to work directly with the GEF Secretariat and Trustee to assist recipient countries in the preparation and implementation of GEF-financed projects, which will enable them to access resources from GEF-managed trust funds directly.

44. The following types of agencies will be eligible for accreditation under rules for the GEF-5 pilot, as agreed by the GEF Council:

a. National institutions

b. Regional organizations

c. Civil society organizations/non-governmental organizations

d. United Nations specialized agencies and programs and

e. Other international organizations.

45. At this time, the LDCF/SCCF Council has not, to date, made any exceptions to the documents "Broadening the GEF Partnership under Paragraph 28 of the GEF Instrument", GEF/C.40/09, and "GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards", GEF/C.40/10/Rev.1. As a result, the LDCF follows the same direct access policies as the GEF, and as described in the aforementioned documents.

46. Accordingly, upon accreditation, GEF Project Agencies will be entitled to assist countries in the preparation and implementation of the LDCF-financed projects and enabling activities, allowing them to access resources from the LDCF directly.

47. Furthermore, recipient countries could take advantage of the direct access modality without accreditation for enabling activities financed under the LDCF. Based on a recommendation made by the participants to the fifth replenishment of the GEF Trust Fund, in July 2010, the GEF Council approved the "Policies and Procedures for the Execution of Selected GEF Activities - National Portfolio Formulation Exercise and Convention Reports - with Direct Access by Recipient Countries" (GEF/C.38/06/Rev.1, July 2010[14]). In accordance with the modality introduced, countries can opt to access resources directly from the GEF Secretariat for the preparation of Convention Reports, with grants amounting to no more than $500,000.

[14] Available on http://www.thegef.org/gef/sites/thegef.org/files/documents/C.38.6.Rev_.1-Policies_and_Procedures_for_Direct_Access_Final%20Revised_July%2001_2010.pdf.

ANNEX I

Summary of Key COP Guidance to LDCF on Operational Aspects of Financing NAPA Implementation

The main pillars of the guidance to the GEF that has directed key operational commitments to finance the implementation of the NAPAs under the LDCF are as follows:

a. At COP7 in 2001, the UNFCCC created and asked the GEF to manage two voluntary adaptation-focused funds, the Least Developed Countries Fund (LDCF)[15] and the Special Climate Change Fund (SCCF);

b. In response to that guidance, the GEF Council approved the establishment of the new, separate trust funds, the Least Developed Countries Fund (LDCF)[16] and the Special Climate Change Fund (SCCF);

c. At COP9[17], the COP requested the entity to take into account, inter alia, the following elements when developing operational guidelines for funding of the implementation of National Adaptation Programs of Action:
    i. Ensuring a country-driven approach, in line with national priorities, which ensures cost-effectiveness and complementarity with other funding sources;
    ii. Equitable access by least developed country Parties to funding for the implementation of national adaptation programmes of action;
    iii. Criteria for supporting activities on an agreed full-cost basis, taking account of the level of funds available;
    iv. Guidelines for expedited support;
    v. Urgency and immediacy of adapting to the adverse effects of climate change;
    vi. Prioritization of activities;

d. At COP11,[18] further guidance on the operation of the LDCF was provided, including the following operational principles:
    i. A country-driven approach, supporting the implementation of urgent and immediate activities identified in national adaptation programmes of action, as a way of enhancing adaptive capacity;
    ii. Supporting the implementation of activities identified in national adaptation programmes of action, and of other elements of the least developed countries work programme identified in decision 5/CP.7, in order to promote the integration of adaptation measures in national development and poverty reduction strategies, plans or policies, with a view to increasing resilience to the adverse effects of climate change;
    iii. Supporting a learning-by-doing approach.

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[15] Decisions 5/CP.7 and 7/CP.7
[16] GEF/C.21/5 "Operation of LDC Trust Fund for Climate Change"
[17] Decision 6/CP.9, paragraph 3
[18] Decision 3/CP.11

e. During the twenty-sixth session of the Subsidiary Body for Implementation in 2007, the SBI "recognized the need for the GEF to continue its efforts to mobilize additional resources to support the implementation of national adaptation programme of action (NAPA) project activities under the LDCF;"

f. It was furthermore noted that "scaled up, new and additional, predictable funding as well as improved access shall be provided to developing countries, in accordance with the relevant provisions of the Convention, to enable and support enhance action on […] adaptation […];"

g. In particular, in the thirty-first session of the Subsidiary Body for Implementation (SBI) in 2009, under the matters relating to Article 4 of the Convention and the least developed countries, the GEF and its agencies were praised for the steps taken to improve the processing of applications for funding of the implementation of NAPA projects under the LDCF and for the constructive dialogue among the LDCs, the LEG, and the GEF and its agencies on the provision of enhanced support for the preparation and implementation of NAPAs;

h. In addition, the SBI, in the context of LDCF, further reinforced the need for additional financial resources for the full implementation of priorities identified in NAPAs as being at least USD 1.93 billion, as concluded by the recent paper produced by the LEG. The Draft conclusions proposed by the chair at COP15 in 2009 provide further guidance to the GEF, requesting it to continue providing enhanced support to developing countries in preparation and full implementation of the National Adaptation Programmes of Action (NAPAs) under the LDCF.