Issued on October 23, 2026

GUIDELINES ON MONITORING AGENCY COMPLIANCE WITH GEF POLICIES

Summary	These Guidelines support implementation of the GEF Policy on Monitoring Agency Compliance with GEF Policies (ME/PL/02) under the continuous, risk-based approach.
Approved by	GEF CEO
Approval Date	October 23, 2026
Last Amendment Approval Date	Not Applicable
Effective Date	October 23, 2026
Applicability	These Guidelines apply to the GEF Secretariat and GEF Partner Agencies (hereafter "Agencies").
Related Council Documents	• Monitoring Agency Compliance with GEF Policies on Environmental and Social Safeguards, Gender, and Fiduciary Standards: Implementation Modalities (GEF/C.51/08/Rev.01) • Strengthening the GEF Partnership: Agency Expansion Procedure (GEF/C.71/05/Rev.01)
Related Documents	• Policy on Monitoring Agency Compliance with GEF Policies (ME/PL/02) • Assessment Guidelines for GEF Agencies' Compliance with Policies on Safeguards, Gender Equality, and Stakeholder Engagement • Assessment Guidelines for GEF Agencies' Compliance with the GEF Minimum Fiduciary Standards • Stakeholder Engagement Policy (SD/PL/01) • Stakeholder Engagement Guidelines (SD/GN/01) • Gender Equality Policy (SD/PL/02) • Gender Equality Guidelines (SD/GN/02) • Environmental and Social Safeguards Policy (SD/PL/03) • Environmental and Social Safeguards Guidelines (SD/GN/03) • Minimum Fiduciary Standards (GA/PL/02)

INTRODUCTION

1. These Guidelines support implementation of the GEF Policy on Monitoring Agency Compliance with GEF Policies (ME/PL/02), as amended effective July 1, 2026. They set out the operational framework for applying the continuous, risk-based compliance monitoring approach, including identification and screening of triggers, assessment where warranted, and follow-up actions.

2. These Guidelines will be applied in a collaborative, transparent, and proportionate manner, consistent with the partnership-based nature of the GEF. The Secretariat will provide advance notice, facilitate consultation with the Agency, and provide a reasonable opportunity for the Agency to respond before findings or proposed follow-up actions are finalized or submitted to the Council, as applicable.

SCOPE AND TRANSITIONAL ARRANGEMENT

3. The Guidelines apply to the GEF Secretariat and all GEF Agencies and to compliance with the relevant GEF policies: Minimum Fiduciary Standards (GA/PL/02), Stakeholder Engagement (SD/PL/01), Gender Equality (SD/PL/02), and Environmental and Social Safeguards (SD/PL/03).

4. For operational purposes, Agencies in good standing as of July 1, 2026 are not required to complete a routine replenishment-cycle self-assessment solely because of the transition to the risk-based approach, and they are considered to be in compliance under these Guidelines unless a trigger is identified. The risk-based approach applies prospectively from July 1, 2026.

RELATIONSHIP TO EXISTING ASSESSMENT GUIDELINES

5. These Guidelines should be read together with the existing GEF assessment guidelines: (i) Assessment Guidelines for GEF Agencies' Compliance with Policies on Safeguards, Gender Equality, and Stakeholder Engagement; and (ii) Assessment Guidelines for GEF Agencies' Compliance with the GEF Minimum Fiduciary Standards. Those documents continue to guide the substantive assessment of compliance.

6. Under the risk-based approach, the existing assessment guidelines are applied in a targeted manner. Where a trigger is confirmed, the Secretariat and any independent reviewer should use the applicable assessment guideline for the relevant policy area, while limiting the review to the issue raised by the trigger unless broader related risks are identified.

TRIGGERS

7. A trigger is a change or issue that materially affects an Agency's continued compliance with the objectives of the GEF policies or the alignment of the Agency's policies and procedures with requirements under the GEF Minimum Fiduciary Standards. For purpose of these Guidelines, the term *material* refers to a change or issue that modifies applicable requirements, alters the Agency's policies or systems that were relied on for accreditation or compliance assessment, or may affect implementation capacity, accountability, safeguards, fiduciary controls, gender equality, or stakeholder engagement to an extent that could result in the Agency no longer being substantially aligned with GEF standards. Materiality will be assessed based on the nature, scale, recurrence and potential effect of the issue on continued compliance.

8. Routine administrative updates, minor editorial revisions, and changes with no plausible effect on compliance are not triggers. Changes that strengthen or add to existing standards or controls would also generally not be expected to constitute a trigger. Greater consideration may be warranted where changes simplify, streamline, remove, or otherwise modify existing requirements in a manner that could affect continued compliance, particularly where such changes relate to fiduciary standards, stakeholder engagement, gender equality or environmental and social safeguards. Where implications are unclear, the Agency may consult with the Secretariat.

***Figure 1*. Trigger Types and Notification Responsibility**

Trigger type	Notification responsibility	Examples	Initial action
GEF-side policy or governance trigger	Secretariat	Material amendment to a relevant GEF policy; material change to GEF governance, institutional arrangements, or systems that may affect Agency compliance obligations.	The Secretariat informs Agencies, explains the potential implications for compliance obligations, and indicates whether further information is required.
Agency-side institutional or policy trigger	Agency	Material amendment to Agency fiduciary, environmental and social safeguards, gender equality, stakeholder engagement, or related policies; material change in institutional capacity, governance, legal status, systems, or implementation capability.	The Agency notifies the Secretariat and provides a short explanation of the expected implications for continued compliance. The Secretariat may request additional information.
Peer multilateral climate fund accreditation trigger[1]	Agency	De-accreditation, non-renewal, or suspension of accreditation with the GCF or Adaptation Fund	The Agency notifies the Secretariat. The Secretariat may request additional information before determining whether the matter constitutes a trigger under these Guidelines.

[1] This trigger may be particularly relevant to GEF Agencies that entered the GEF Partnership through the fast-track approach based on prior accreditation with the GCF and/or Adaptation Fund. See *Strengthening the GEF Partnership: Agency Expansion Procedure* (GEF/C.71/05/Rev.01).

Secretariat-identified potential issue	Secretariat	Issue identified through annual portfolio oversight, evaluations, implementation support, policy exchanges, or other credible information that suggests a material or recurring concern in relation to the Agency's alignment of policies and/or oversight mechanisms with GEF standards. Individual project-level issues and challenges with the execution of projects would not ordinarily constitute a trigger unless they indicate a broader recurring or systemic compliance concern at the Agency level.	The Secretariat provides the Agency with written notice and requests its response before determining whether the matter constitutes a trigger under these Guidelines.

NOTIFICATION AND PRELIMINARY SCREENING

9. Agency notifications and Secretariat notices should be concise and proportionate. They should identify the relevant change or issue, the applicable GEF policy area, the expected effect on continued compliance, and any immediate mitigation measures already in place.

10. When the Secretariat identifies a potential issue through routine portfolio oversight or other credible information, it will provide the Agency with advance written notice and a reasonable opportunity for consultation and response before determining whether the matter constitutes a trigger under these Guidelines. The notice should identify the factual basis of the concern, the relevant GEF policy area, and the potential next steps.

11. Following consideration of the Agency's response, the Secretariat will complete a preliminary screening to determine whether: (i) no further action is required; (ii) additional information is needed; (iii) a formal third-party compliance assessment, alongside an Agency self-assessment, is warranted. Where appropriate, the Secretariat may consult or seek guidance from Council where a matter raises material, novel, or cross-cutting issues, or where the potential follow-up may require Council consideration or decision.

AGENCY RESPONSE AND SELF-ASSESSMENT

12. Where a potential trigger is identified, the Agency will be given an opportunity to provide information before the trigger determination is finalized. The response may include a certification of continued compliance, supporting policies or procedures, project examples, implementation evidence, or proposed mitigation measures, consistent with the relevant assessment guideline.

13. A self-assessment is required only where a confirmed trigger requires a formal third-party compliance assessment. The scope of the self-assessment should be proportionate to and limited to the issue raised by the trigger, unless related risks are identified.

14. If the Agency disagrees with a proposed trigger determination or assessment scope, it may submit a written response and request a discussion with the Secretariat before the determination or scope is finalized. If the matter remains unresolved, it may be escalated to GEF senior management and/or the CEO. Where appropriate, the Secretariat may also seek guidance from Council before the trigger determination or assessment scope is finalized. Where the matter proceeds to a formal assessment or is submitted to Council, the Agency's written position will be included in the relevant materials, either in full or summarized with the Agency's agreement.

15. The Secretariat will administer the process, including notification, consultation, preliminary screening, development of the proposed assessment scope, and commissioning of an independent reviewer(s), in accordance with the Policy and these Guidelines. The assessment scope will be finalized after considering the Agency's comments. Assessment findings, the Agency's response, any proposed time-bound action plan, and other matters requiring Council consideration or decision will be submitted to Council, as applicable.

FORMAL COMPLIANCE ASSESSMENT

16. A formal third-party compliance assessment will be initiated where preliminary screening indicates that a confirmed trigger may materially affect continued compliance and the matter cannot be resolved through Agency clarification. The independent reviewer(s) will apply the relevant GEF assessment guidelines and limit the assessment to the defined policy areas and issues. If related issues emerge, the reviewer(s) will inform the Secretariat and the Agency, and the Agency will be given a reasonable opportunity to respond before the scope is expanded or findings are finalized.

17. The Secretariat will select and commission the independent reviewer(s) in accordance with applicable procurement procedures, taking into account the competency and independence requirements for Independent Assessment Expert and Panel set out in Annex IV of the Agency Expansion Procedure[2], as applicable. Reviewer(s) must have relevant expertise, be independent of the Agency concerned, and disclose any actual or potential conflict of interest. The terms of reference will specify the scope, deliverables, funding arrangements and timeline, proportionate to the nature and complexity of the assessment, and be shared with the Agency concerned in advance. The formal assessment should normally be completed within 3 months of commissioning. Where additional time is required due to the complexity or scope of the assessment, the Secretariat will inform the Agency of the reasons and the revised timeline. The costs of the assessment will be covered by the Secretariat.

[2] See *Strengthening the GEF Partnership: Agency Expansion Procedure* (GEF/C.71/05/Rev.01).

***Figure 2*. Indicative Process and Timelines**

Step	Description	Responsible party	Indicative timeline
1. Potential trigger notice	The Agency or Secretariat identifies a potential trigger and provides written notice.	Agency or Secretariat	As soon as practicable
2. Preliminary screening	The Secretariat reviews the potential trigger and determines whether additional information is needed.	Secretariat	Within 15 business days
3. Agency response	The Agency provides clarification, certification, supporting information, or proposed mitigation measures.	Agency	Within 15 business days after the request
4. Trigger determination	The Secretariat determines whether no further action, additional information, or a formal assessment is warranted. Council guidance may be sought.	Secretariat, following consideration of the Agency's response	Within 10 business days after the Agency response
5. Formal third-party assessment	Independent reviewer(s) assess continued compliance within the defined scope, applying the relevant GEF assessment guidelines.	Independent reviewer(s), commissioned by the Secretariat	Within 3 months of commissioning
6. Agency comments	The Agency reviews draft findings for factual accuracy and may provide a written response before the findings are finalized.	Agency; reviewer(s) consider the comments	Within 10 business days
7. Council consideration, as applicable	The Secretariat submits final findings, the Agency's response, any proposed time-bound action plan, and other proposed follow-up requiring Council consideration or decision.	Council,	At the next feasible Council meeting

INTERIM ARRANGEMENTS

18. Initiation of a preliminary screening or formal assessment does not automatically suspend or otherwise restrict an Agency's ability to seek GEF financing. Unless the Council decides otherwise, the Agency may continue to operate while the review is underway, subject to proportionate risk-mitigation measures agreed with the Agency and, where relevant, the Trustee, and only in accordance with terms of Financial Procedures Agreements.

19. Where the potential issue relates to a specific policy area, the Secretariat may recommend interim measures proportionate to the risk, including additional information, enhanced supervision, or limitations on activities requiring application of standards under review. Such recommendations would be made to Council, for consideration and decision.

OUTCOMES AND FOLLOW-UP

20. A formal assessment may result in one of the following findings: (i) continued compliance confirmed; (ii) continued compliance confirmed with follow-up actions; or (iii) non-compliance

identified. The final findings will reflect the Agency's comments and any unresolved Agency position.

21. Where continued compliance is confirmed, the Secretariat will close the review and inform the Agency. Where continued compliance is confirmed with follow-up actions, the Agency and the Secretariat will agree on proportionate actions and timelines and monitor their completion. Material follow-up matters will be reported to Council, as applicable.

22. If non-compliance is identified, the Agency, in consultation with the Secretariat, will prepare a concrete, time-bound action plan to achieve compliance. The Secretariat will submit the action plan for Council review and no-objection. Unless Council decides otherwise, the Agency may continue to seek GEF financing while implementing the action plan, provided that its funding proposals do not require application of policy standards with which it has not yet achieved compliance, consistent with the relevant Council decision.

23. The Secretariat will maintain a record of potential and confirmed triggers, screening outcomes, self-assessments, formal assessments, Agency responses, and follow-up actions to support transparency, consistency, and institutional learning.

PRINCIPLES

24. Below are key principles for implementing these Guidelines.

- Prospective application: the risk-based approach applies from July 1, 2026.
- Partnership and consultation: Compliance monitoring will be conducted through early engagement, advance notice, and good-faith consultation.
- Agency right of response: Agencies will have a reasonable opportunity to clarify facts and respond before escalation and before finalization of findings.
- Consistency with existing assessment practice: triggered assessments should use the applicable GEF assessment guidelines for the relevant policy area.
- Predictability: the Secretariat will use the process and indicative timelines in these Guidelines, unless circumstances require adjustment.