

10 September 2021

Response matrix for Cities, Buildings and Urban Systems Sector Guide

Summary

The accompanying sector guide was released for consultation in November 2020 and the consultation was open until the end of January 2021 to provide sufficient time for stakeholder to provide inputs. Consultation was open to the Board, advisers, observers, NDAs, Direct and International Access Entities, civil society, private sector representatives, partner institutions and sector experts. The Secretariat received more than 570 specific comments and feedback on this draft. These and the responses by the Secretariat sector experts on how these comments were considered in the updated version of the sector guide is contained in this document.

This feedback and response matrix has been prepared for information purposes only to share the different comments received by the organizations that submitted feedback to the GCF in response to the public consultation of the "Cities, Buildings and Urban Systems Sectoral Guide" draft for consultation version 2020.

The information and content in this document do not imply any judgment on the part of GCF concerning the legal status of any territory or any endorsement or acceptance of such boundaries.

Responses to feedback noted here are those of sector experts and may not necessarily be those of the GCF.

The mention of specific entities, including companies, does not necessarily imply that these have been endorsed or recommended by GCF.

For further inquiries regarding this feedback and response matrix please contact us via:
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Sectoral Guide Section	Feedback (verbatim)	Organization	Response from GCF/DMA sectoral specialists
General	We have serious concerns as this document contains some glaring omissions and inappropriate orientations not in line with a human-rights based approach. However, the process of delineating comments at this level may not be best suited for this document when these concerns could have been addressed much earlier in the document's conception via stakeholder engagement by the Community of Practice.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Noted. References to community consultations and involvement have been strengthened in Sections 4, 5 and 7.
General	We generally appreciate the structure and flow of the draft guide, and this model seems appropriate for structuring other guides.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Thank you.
General	Center people in this document. The guidance document is not people-centered, but instead building/construction-centered. Beneficiaries of projects/programmes instructed by this guidance should not be the cement industry and real estate developers, but rather the inhabitants of cities, and particularly the most vulnerable segments of the population living in cities. This is a fundamental flaw. The guidance needs a human rights centered framework to inform the transition to low-carbon and climate resilient cities, such as acknowledging and incorporating the human right to adequate housing (https://www.un.org/ruleoflaw/files/FactSheet21en.pdf), the human right to water and sanitation (see for related links and resources here: https://www.ohchr.org/EN/Issues/WaterAndSanitation/SRWWater/Pages/10Anniversary.aspx), or the right to food (see for example relevant resources here: https://www.ohchr.org/EN/Issues/ESCR/Pages/food.aspx) and focusing on what is needed to ensure inclusive, accessible, and secure urban food systems. The PSPs in particular do not center people, in part through skirting transportation and mobility (which, granted, may be covered in more depth in the transportation guidance, but has a critical urban context that should be further explored here). Indeed, the document makes no reference to the United Nations System-wide Guidelines on Safer Cities and Human Settlements, https://unhabitat.org/united-nations-system-wide-guidelines-on-safer-cities-and-human-settlements , which seems fundamental if the GCF is to be supporting large-scale interventions in urban environments. Furthermore, a people-centered approach would acknowledge the required basic service provision of cityscapes and related infrastructure in the draft guide, such as needed to ensure the provision of basic human rights for all city dwellers.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	References to community consultations and involvement have been strengthened in Sections 4, 5 and 7 and references to SDGs strengthened in Executive Summary and Sections 2, 4 and 7.

General	<p>Change from a top-down approach to one that builds the resilience of urban systems through community engagement and leadership. The interventions in this document fail to mention civil society, community-led initiatives, or anything that systematically presumes and recognizes residents of cities are actively engaged in shaping the places where they live, work, and play, as they are. Designing resilient urban systems is not a top-down endeavor, and this guidance cannot achieve the outcomes it seeks without modalities that prioritize the voices, experiences, needs, leadership, and networks of local residents. Approaches to urban design and development must likewise exhibit best practices of information disclosure, and transparency, in addition to fostering fora and facilitating processes for community participation and decision-making. The omission of these expectations and commiserate examples and case studies in this guidance is more worrisome given the omission of informal settlements (see other overarching comments) from the conceptualization of urban systems, as these are spaces where human rights may be violated and residents granted little power over their residences and access to urban services. Good governance, including real pathways for accountability when rights, including the right to access to information, are violated, is central to urban projects and reflects the connections and interchange between residents and policymakers that must be reciprocal rather than top-down. This connects with the lack of focus on cities' responsibility to provide services to their residents.</p>	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	As above
General	<p>Recognize and address informal settlements and their needs and rights. In alignment with the other overarching comments, a glaring omission obvious throughout the document is the lack of an acknowledgement of the different types of city forms and informality, which requires a more inclusive guide. The differences across urban systems means that there are some cities that require more urgent attention on adaptation measures rather than mitigation measures (see Overarching Comment #4). The absence of an acknowledgement of the large scale of informal settlements in large cities in developing countries, which see some of the greatest growth and where the needs for related appropriate climate-resilient infrastructure is highest, must be addressed. Likewise, these informal settlements are where some of the most community-driven, resilience-oriented approaches may be emerging. It is also these approaches that would and should benefit from large-scale funding and support for horizontal learning.</p>	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Agree this issue is important. References to informality strengthened in Sections 2, 4, 5 and 7.

General	<p>Recognize that climate action in cities must also prioritize adaptation. Though it is recognized that adaptation is also necessary in cities, especially those in developing countries, the four paradigm shifting pathways (PSPs) included in the guidance have a strong focus on mitigation. Three out of four PSPs are mitigation centric, while one of the PSPs (Compact and resilient urban development) lightly touches on strengthening resilience. The draft guidance comes across as an almost exclusively mitigation-focused document (with GHG emissions reductions being the primary impact mentioned), with scant attention and detail given to adaptation needs and requirements. Adaptation references are mostly relegated to sea-level rise/flooding dangers, with a bit related to heating. This document does not, therefore, properly address the needs of the most vulnerable populations in these present and future cities. This despite the fact that one of the GCF result areas is related to resilient infrastructure and built environment to climate change threats, while other adaptation result areas have close links (e.g. water security, livelihoods, health). Focus on how to increase the resilience to climate change impacts of informal housing, urban food, and water systems should be a core focus. This misdirected attention toward mitigation in the absence of adaptation can be seen as well in the strong focus on the sources of GHG emissions in cities without a close enough look at the drivers of vulnerability in these developing country cities, not only in the pathways but also in the barriers analysis. While this happened after this document was drafted, new initiatives are recognizing the imperative and focus on urban adaptation, noting this announcement from the Climate Adaptation Summit: "This week at the Climate Adaptation Summit, we helped launch the 1000 Cities Adapt Now initiative with the mayors of Miami, Paris, and Rotterdam and the Global Center on Adaptation, Resilient Cities Network, and UN-Habitat. The 10-year global program aims to scale up action to 1,000 cities in the coming decade, focusing on urban water resilience, nature-based solutions, transformative capacity building and peer-to-peer learning." (see related info at: https://wriroscities.org/news/release-joint-statement-accelerating-climate-adaptation-%E2%80%981000-cities-adapt-now%E2%80%99#:~:text=The%20main%20goal%20of%20the,million%20to%201%20billion%20people). There is also a need to address disaster risk management in the context of urban infrastructure. Specifically, linking sustainable infrastructure with disaster risk management must also consider where buildings are sited, using participatory and inclusive processes that integrate community demand and considerations of livelihoods alongside education and access to information on flooding and other environmental and climate impacts and what different sites can offer. A clear acknowledgement of this linkage is missing in the draft guidance.</p>	<p>As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations</p>	<p>Adaptation is indeed an important issue. It was a separate PSP in the original draft, but was consolidated with Compact cities because similar institutional arrangements are required to finance and implement investments in these areas. Discussion of PSP 3 in Sections 1 and 5 has been amended to better delineate adaptation issues.</p>
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General	<p>Integrate a cross-cutting gender analysis. The draft guidance is characterized by a shameful case of gender-blindness. In a 42-page document, the words “gender” and “women” appear for the first and only time in section 5 and then only in describing the “Sustainable Development Criterium” under the Investment Framework. This is unbelievable for a Fund that has a gender mainstreaming mandate for all of its operations, including integration of gender considerations in policies and guidance documents. If the guidance does not acknowledge that there are important gender considerations with respect to cities, buildings, and urban systems, and the guidance is to provide AEs with some ideas and recommendations, how are AEs expected to mainstream gender in their proposals submitted following this guidance? The draft guidance needs a fundamental refocus with a gender lens applied throughout with a view to gender-responsive urban planning. (For a feminist perspective see: https://www.right2city.org/news/espanol-que-es-el-urbanismo-feminista/; for a institutionalist perspective, see, e.g. https://www.worldbank.org/en/topic/urbandevelopment/publication/handbook-for-gender-inclusive-urban-planning-and-design or https://www.worldbank.org/en/news/feature/2020/03/07/ciudades-feministas-diseno-urbano-para-mujeres-y-minorias). To give the example of urban mobility: how can the guidance discuss modal shifts of urban transport to mass transit, walking, and cycling, without acknowledging the gender-differentiated uses and needs of transportation modal use and mobility? (See, for example: https://blogs.worldbank.org/transport/transport-not-gender-neutral; https://www.ssatp.org/sites/ssatp/files/publications/HTML/Gender-RG/Source%20%20documents/Tool%20Kits%20&%20Guides/Urban%20Transport/TLUT1%20%20GTZ%20Gender%20and%20Urban%20Transport.pdf; https://www.itf-oecd.org/sites/default/files/docs/dp201111.pdf; or https://www.sciencedirect.com/science/article/abs/pii/S0967070X12000121?via%3Dihub, to indicate just a few relevant resources elaborating on the link between gender and [urban] transport).</p>	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	<p>Gender is indeed important but the detail envisaged would require separate treatment in an Annex as it is effectively another report. This would be a useful exercise and, resources permitting, a Gender and Urban Climate Finance Annex could be produced. Discussion of gender added in Section 5 and strengthened in Section 7.</p>
General	<p>Remove the misguided focus on financial structuring for the private sector as the primary goal. Instead of centering the draft guidance around the realisation of climate resilience, reduced emissions, and the SDGs and a discussion what financing approaches might be best to support their achievement in the urban context, giving the challenges of persistent poverty and exclusion and lack of basic services, the sectoral guide instead seems to see its raison d'etre in presenting an array of financial instruments that would best work towards optimizing economic returns and lowering the investment risks of large-scale private sector infrastructure or institutional investors (thus elevating the means - financial instruments -- to the the goal and true purpose of the guidance). It seems that private institutions represent the main beneficiaries of actions intended as a result of this guide, instead of residents living in cities, their livelihoods, and the livability of urban spaces in the face of increasing climate change challenges. This raises the concern that this guidance might turn out to be another developer – contractor – infrastructure- driven misnamed ‘green cities’ approach, which is based on the existing model of capital accumulation and the speculative real estate market approach (prone to bubbles, pricing out average citizens of affordable space), all which only drives further urban inequality. There is no indication of how local needs and knowledge will be prioritised, and there is no acknowledgement of the urban impacts of human migration driven by climate change. Further, while scaling-up climate finance is extremely relevant, so is achieving the desired impacts, addressing the needs of the most vulnerable, and avoiding other negative social and environmental impacts, especially when the private sector, with its often narrow view of financial outcomes, is involved. The guidance should focus less on leveraging private finance and more on public finance and the role of the public sector in increasing resilience through support of basic services and public goods for vulnerable communities rather than merely mitigation.</p>	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	<p>The discussion of financial structuring is not meant to suggest that only private sector projects are to be pursued. On the contrary, a large, proactive and central role is envisaged for the public sector, which needs to be strengthened both to implement public projects more effectively and to be able to ensure costs, benefits and risks are equitably shared with the private sector. GCF will support such capacity development. It should be noted however, that without mobilising private and institutional finance, it will not be possible to meet Paris commitments.</p>

General	<p>The general institutional backdrop for this key barrier is the lack of integrated policy and planning systems and the limited available support for preparing technically sound LECR plans (e.g., quantification and pricing of avoided emissions for mitigation initiatives, risk-based adjustments to the design of infrastructure for enhanced resilience, valuation of benefits of innovative adaptation measures in order to justify financing), in turn caused by inadequate planning capability to tackle climate uncertainty/risks combined with lack of upfront financing to cover the cost of pre-feasibility studies and project designs so as to generate a pipeline of projects that meet GCF's investment criteria and programming framework (page 32).</p> <p>Suggest that the Guide identify/prioritize local capacities that need to be strengthened, expected to cover problem assessment and project planning methods for quantifying and valuation of avoided emissions, and on quantifying benefits of climate-resilient urban assets to facilitate investment appraisal and decision-making. Of importance is the balancing of concerns associated with possible higher upfront costs of low-emission and resilient infrastructure assets against their expected lower O&M costs and reduced future damage risk and associated retrofitting or rebuilding costs.</p>	Asian Development Bank	Agree that local capacities are important and the critical capacities are set out in the discussion of barriers in Section 4. Building capacities is thus important but will mainly have to be addressed through the Partnership strategy which will be set out in an Annex
General	<p>There is big potential for cities in developing countries to leapfrog to low-emissions and carbon resilient (LECR) development, and not have to tread the same development path taken by the developed world.</p> <p>The document noted that governments have been unable to access finance needed to invest in low emission and climate resilient urbanization, and that less than 10% of available global climate finance were disbursed/prioritized for locally focused climate investments (pages 6, 11).</p> <p>The main barrier (as revealed in the survey findings, pages 15-16) is the low capacity of urban planners and public actors to develop projects of good quality to be ready for investment. Even though guidance on developing good LECR projects is provided (Chapter 5), translating these to bankable projects remains a big gap.</p> <p>Suggest expanding chapter 5 on guidance or adding a separate section after chapter 4 on the case studies, to discuss how specifically the challenge of generating a strong pipeline of projects that meet the GCF's investment criteria and programming framework will be tackled.</p>	Asian Development Bank	The issue of project pipeline is very important. It is flagged strongly under the first driver of change (planning and programming). Structuring GCF assistance to promote quality pipeline development is addressed in sections 5 and 7, but in terms of more detailed treatment, this will have to be addressed in more detail in an Annex.
General	The important role city networks play in paradigm shifting and project development should be recognized better.	Head of Innovative Finance, ICLEI	City networks are referenced as important under the Coalitions and Knowledge Driver and will be central to the Partnership Strategy yo be detailed in an Annex
General	The target audience and the goal of the guide is not clear and is a mix.	Head of Innovative Finance, ICLEI	The target audience is GCF AEs and project sponsors. The presentation is pitched at urban professionals and sponsors of climate projects
General	The guide describes very well the difference between the mega and secondary cities and acknowledges the difficulties secondary cities face, but apart from offering them support with project bundling, there is a clear preference for large cities with solid financial indicators and ability to access international finance.	Head of Innovative Finance, ICLEI	The intent is not to focus on large cities, indeed in aggregate intermediate cities have as much climate impact as the megacities. In section 5 specific mechanisms relevant to smaller cities are canvassed but more detail will be given in the Annexes.
General	The guide gives a very good overview on the barriers and highlights as a conclusion: "The most common response was the low capacity of urban public actors to develop projects ready for investment. " but it is missing or not elaborated in detail how GCF wants to address that.	Head of Innovative Finance, ICLEI	Thank you - the GCF response is outlined in Section 5 but more detail of GCF responses in specific sectors and circumstances will be given in the Annexes

General	<p>The Sustainable Cities Impact Program (SCIP) will support nine countries and 24 cities for participation in the GEF-7 financing round. The incoming cohort of countries includes Argentina, Brazil, China, Costa Rica, India, Indonesia, Morocco, Rwanda, and Sierra Leone. UNEP is the Implementing Agency for Argentina, Brazil and India. The SCIP consists of an allocation of approximately US\$147 million in GEF resources, bringing in US\$ 2.1 billion in co-financing and contributing more than 120 million tons of CO₂e in GHG mitigation benefits. The Sustainable Cities Impact Program is one the three GEF-7's impact programs that were created to help countries pursue holistic and integrated approaches for greater transformational change in key economic systems. Cities are ideal locations for implementation of integrated approaches because of the nature of the problems they are tackling. For the GEF-7 round of the Sustainable Cities Impact Program (SCIP), UN Environment Program (UNEP) has been selected as Lead Agency. UNEP has a global mandate on environmental issues, all of which are relevant in cities and for sustainable urban development. UNEP has a dedicated cities unit, focusing on decoupling, detoxifying and decarbonizing of cities. Among other things, UNEP's cities work includes resource flows, urban metabolism and morphology as well as urban integrated systems approaches. UNEP leads and participates in many of the Sustainable Energy for All accelerators and through them is supporting the Secretary General's summit and delivery of SDG 11 on cities. The UNEP Cities Unit also hosts the platform on the Global Initiative for Resource Efficient Cities (GI-REC), as well as the Global Alliance for Buildings and Construction (GlobalABC) and the District Energy for Cities Initiative and is a conduit to make other sector expertise in UNEP relevant to the local level, such as urban ecosystem based adaptation, waste management and transport. Harnessing the power of networks and the experience from the GEF-6 SC-IAP, the SCIP will bring together three leading global organizations working with cities supporting their ambition and actions to fulfil their climate and sustainability targets. The three-organization consortium, also known as the 'City-Based Organizations' will work as co-executing partners of the SCIP. Each of the CBOs brings a different and complementary set of strengths to the SCIP ranging from cutting-edge knowledge and tools, political leadership and advocacy, existing regional networks and experience in capacity building at the ground level. Each group commands in-depth city-based experience, process and content knowledge, and deep relationships with cities: ICLEI is a network that includes more than 1,750 cities, towns, and regions in 100 countries around the world that use its tools and expertise to promote sustainable development. WRI works with around 120 cities on ongoing engagements and another 200 through lighter touches through its international offices to promote innovative work on the ground through demonstration projects and scale up solutions. C40 Cities is a network of 94 of the world's megacities committed to addressing climate change. C40 supports cities to collaborate effectively, share knowledge and drive meaningful, measurable and sustainable action on climate change. Representing 700+ million citizens and one quarter of the global economy, mayors of the C40 cities are committed to delivering on the most ambitious goals of the Paris Agreement at the local level.</p>	UNEP	<p>Noted. Networks are addressed in the Coalitions and knowledge driver, but will be discussed in more detail in the Partnership Strategy in the Annexes.</p>
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General	<p>Contexte mondial</p> <p>Le processus des systèmes urbains est souvent assimilé à une explosion démographique. Dans les pays en développement, les hommes s'entassent de plus en plus dans les villes. Cette concentration de milliers d'habitants au même endroit est la source de toutes sortes de pollutions, et des aléas climatique qu'il est souvent difficile de combattre.</p> <p>Le problème qui accable le plus les villes, aujourd'hui, est l'accumulation des déchets d'ordures ménagères, que l'on entasse. Qu'il s'agisse de les transporter par route vers l'intérieur. La situation est évidemment très complexe dans nos pays en développement. La plupart de nos villes du tiers monde sont cernées par les bidonvilles où s'entassent des populations sans services publics.</p> <p>Dans presque tous les cas, ceux qui ont migré des campagnes vers les villes ont augmenté leur revenu. Ce qui leurs avaient permis de transférer des fonds, même modestes, a des parents demeurés en zone rurale. cette perfectionnement est sûrement fragile et modeste, car elle s'accompagne le plus souvent de conditions de travail très dures et d'un habitat éphémère ou insalubre ; elle n'en a pas moins une force de conviction puissante sur ceux qui sont demeurés dans les campagnes. Cela explique la formidable poussée du phénomène, l'énorme gonflement des bidonvilles, et son corolaire : détérioration de l'environnement urbain et sur bain.</p> <p>La ceinture de désertification et de déboisement qui enserré les villes urbains dans nos pays en développement, avec l'écrasante majorité des habitats vivra dans des conditions d'hygiène dégradées. les populations urbaines vivent dans des abris d'une seule pièce occupée en moyenne par cinq personnes. Surpopulation, promiscuité, accès incertains à l'eau salubre et a un assainissement adapté, tel est le lot de ces énormes concentrations urbaines ou l'habitat souvent illégal. la croissance explosive de la pauvreté urbaine pourrait bien faire qu'à terme la stratégie spontanée d'exode vers les villes se retourne contre ces nouveaux migrants.</p>	Aube Nouvelle pour la Femme et le Développement (ANFD non profit NGO)	Noted. Good background context for Africa. Thank you
General	<p>Voies d'investissement changeant de paradigme</p> <p>Les habitants urbains dans les Etats en développement sont souvent frappés à l'extension d'un déséquilibre majeur : le chômage qui demeure avant tout un « mal ». les Etats devraient mise en place des politiques diverses, qui doivent être divisées en deux groupes : les politiques dites de traitement social urbains , qui s'efforcent d'aider les populations touchées, et les politiques du traitement économique, cherchant à favoriser l'emploi, en incitant les entreprises à embaucher , en développant l'investissements productif et en favorisant la reprise de l'activités économique verte. La formation est aussi devenue un axe prioritaire de lutte contre les désœuvrlements des jeunes urbains contre le chômage.</p> <p>Les activités économiques devraient consister à produire des denrées alimentaire et que l'on peut considérer historiquement comme le premier secteur économique avec la pêche. Soutenir et appliquer une agriculture intensive et mobiliser la jeunesse ou populations actives vivant dans les milieux urbains, qu'elles obtiennent de hauts rendements à l'hectare, par des investissements et de la recherche, dans leur immense majorité.</p> <p>Dans le pays développés, le développement économique a fortement accru la consommation énergétique dans les milieux urbains. tan disques dans les en développement elles provoquent en effet inflation et les industries les plus consommatrices connaissent des difficultés sans précédent, les Etats dépendants s'efforcent , dès lors en réduire leur consommation et de diversifier leurs sources d'approvisionnement énergétiques ; plus grande utilisations du charbon et du gaz naturel et le développement du nucléaire.</p> <p>Les aspects de la croissance urbaine et industrielles contribuent à la croissance de l'emploi et des salaires pour le rythme de réduction de la pauvreté et en mettant en place, l'infrastructure urbaine nécessaire. Une plus grande neutralité du régime des échanges peut favoriser un mode d'expansion industrielle a plus forte intensité de travail dans les secteurs qui concurrencent les importations aussi bien que dans les secteurs exportateurs, les interventions sur le marché des capitaux et du travail</p>	Aube Nouvelle pour la Femme et le Développement (ANFD non profit NGO)	As above

	<p>dans beaucoup des villes de pays diminuent le coût des importations de biens d'équipement (par l'application de tarifs bas et la surévaluation des taux de change), accordent des avantages fiscaux a l'investissement en biens d'équipement et subventionnent le crédit, toutes choses qui tendent à diminuer le prix du capital. L'accroissement de la demande urbaine devrait répondre à la création de nombreuses entreprises privées contribuent à accroître la salariale. La multiplication des activités du petit commerce, fournit des occasions de gain plus nombreuses aux habitants des villes. Dans les villes, l'exode rural stimule encore davantage la demande. Mais il la fractionne aussi : à la consommation des nouveaux riches s'ajoutent des pouvoirs d'achat plus faibles ainsi qu'une demande non solvable.</p>		
General	<p>Interventions et financement</p> <p>Il ressort clairement que le succès ou l'échec des programmes d'intervention de l'aide au financement dépend à la fois des donateurs et des bénéficiaires. Lorsque les destinataires de l'aide ont adopté des politique qui leur permettaient d'utiliser efficacement ces apports extérieurs , et lorsque les donateurs ont su à la fois bien conseiller et fournir des aides destinées à éliminer les obstacles au développement , il en est résulté un cercle vertueux de croissance , économique et de libération progressive de l'aide. Mais les destinataires se sont souvent engagés dans des voies qui n'allaient ni dans le sens de la croissance, ni dans celui de la réduction de la pauvreté urbains et les donateurs s n'ont pas toujours suivi assez attentivement les programmes ou lié leur aide à la mise en place de réformes. Qu'il s'agisse de la croissance de l'économie et à éliminer les obstacles au développement.</p> <p>Le partenariat entre les partie prenante qui seront impliqué dans les programme d'action régionale, national et locales, y compris les organisations de la sociétés civiles, les secteurs privées, et les agences de développement, devra être renforcé.</p>	Aube Nouvelle pour la Femme et le Développement (ANFD non profit NGO)	Agreed. The key barriers for GCF's mission in the urban sector are set out in Section 4.
General	<p>Exemples de pays</p> <p>Par rapport au contexte particulier de la RD. Congo dans lequel je vis , la situation environnemental de population urbaines À l'intérieur même du pays , femmes et jeunes sont beaucoup plus confrontés par du fait d'une insertion plus difficile dans le monde du travail. Dans nos quartiers déshérités, les ordures traînent dans la rue abandonnées aux chiens et aux mendiants. Migrer vers les villes, pour répondre à ce défi. le pays connaît aujourd'hui avec le nouveau système en place le pays fournit certaines efforts dans les évacuations des ordures dans les milieux urbaines mais beaucoup reste à faire compte tenue de l'intensité de la pollution dans nos villes et la dimension du pays. sur le plan socioéconomique, Autant que la pauvreté elle-même, c'est l'instabilité du revenu qui pousse les jeunes paysans à migrer vers les villes. Cette stratégie, individuelle et familiale, de recherche de condition de vies moins aléatoires est-elle efficace ? Car la migration vers la ville demeure un moyen d'améliorer le revenu et l'accès à certaines services, si minimaux soient-ils. Néanmoins cela ne présente pas une solution durable.</p>	Aube Nouvelle pour la Femme et le Développement (ANFD non profit NGO)	Thank you. Indeed community level projects are important and are now explicitly referenced in Section 5.

General	<p>Orientations pour le développement de projets</p> <p>Il faut avant tout que les politiques applique dans l'ensemble de l'économie et dans les différents secteurs en proposant de plan de soutien dans l'ensemble de l'économie et dans différents secteurs encouragent le développement rural et l'emploi urbain. Un tel programme nécessite une taxation modérée de l'agriculture et des marchés des produits, et des facteurs relativement exempts de distorsions. Il faut en outre mettre en place une infrastructure et créer un environnement qui rend l'évolution technique accessible aux pauvres des villes et aux paysans. Ensuite, des mesures expresses doivent être prises pour améliorer la participation des pauvres urbains à la croissance en leur ouvrant plus largement à la terre, au crédit ainsi qu'à l'infrastructure et aux services publics. Les redistributions foncières peuvent réduire la pauvreté. D'autres politiques pour le développement et d'élargissement des programmes souples, qui comportent la participation de ceux à qui ils doivent bénéficier, qui créent des institutions, qui emploient des ONG et des associations locales et qui répondent aux besoins de l'endroit, constituent le meilleur moyen de modeler l'infrastructure, les services et la technologie sur les besoins des urbains. Aussi, de politiques qui facilitent la migration dans des régions urbaines, cependant, il faudra procéder à des investissements supplémentaires, qui nécessiteront vraisemblablement des subventions publiques, afin de répondre aux besoins de base de maintenir ou d'élever les rendements et de préserver les ressources naturelles.</p> <p>L'État doit respecter, protéger, promouvoir et réaliser les droits sur les recommandations suivantes spécifiées ci-dessous: - Environnement, chacun a droit à un environnement qui ne nuit ni à sa santé ni à son bien-être; protéger l'environnement au profit des générations présentes et futures grâce à des mesures législatives et autres raisonnables qui préviennent la pollution et la dégradation écologique, favorisent la conservation, assurent un développement écologiquement durable et l'utilisation des ressources naturelles tout en promouvant un développement éco et social justifiable. - Le logement, chacun a le droit d'avoir accès à un logement convenable. L'État doit prendre des mesures législatives et autres raisonnables dans la limite de ses ressources disponibles pour parvenir à la réalisation progressive du droit - Santé, chacun a le droit d'avoir accès aux services de santé, y compris aux soins de santé reproductive, à l'eau en quantité suffisante, à la sécurité sociale, y compris s'il est incapable de subvenir à ses besoins et à ceux de ses accusés, une assistance sociale appropriée - Comprendre et traiter ces différences et autres causes symptomatiques permettra aux femmes d'exprimer librement leurs préoccupations et de négocier sur une gamme de priorités de manière à répondre positivement à leurs circonstances et besoins. pour ceux qui vivent dans la pauvreté, cela implique un accès sûr à l'eau, l'emplacement et la sécurité des installations sanitaires communes dans les établissements informels, la modernisation des bidonvilles, la sécurité et les transports publics. - Au niveau politique, il est important d'œuvrer à la mise en œuvre de la résolution 1325 des Nations Unies pour l'implication active des femmes locales dans la prise de décision, - de gestion de la ville, de l'habitat et de l'aménagement du territoire pour que la dimension de genre dans la gestion urbaine ne reste pas qu'un critère optionnel, mais soit réellement source d'une nouvelle culture et changement profond. il faut que le contenu de cette Charte soit élargi diffusé, tant auprès des décideurs politiques nationaux, des décideurs économiques que dans les professionnelles, à travers les médias et par une participation active à tous les niveaux aux rencontres et conférences</p>	Aube Nouvelle pour la Femme et le Développement (ANFD non profit NGO)	Agree. The GCF's interventions need to also address the SDGs - this is now stated explicitly in Section 7.
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General	<p>1. Thus, we suggest conducting analyses of the impacts of green solutions on vulnerable groups and individuals, in particular conducting affordability analyses that will inform the main challenges for vulnerable people to adjust to green solutions and how they could benefit from those instead of them being a burden for them. The draft Strategy identifies “Enhanced livelihoods of the most vulnerable people, communities and regions” as one of the eight mitigation and adaptation results areas. However, the draft Strategy lacks to mention the need for social contextualization and measures to tackle the impacts of climate change on the most vulnerable urban residents (impacts on women, people living under the poverty line, disabled people, elderly people, etc). For example, the Sectoral Strategy does not mention the need for affordability analysis that will identify how green investments will impact vulnerable individuals. Additionally, the Strategy does not provide examples of types of measures to address affordability challenges when applying greener solutions for vulnerable households in order to make GCF-funded projects serve the community. For example, how to make sure that the potentially higher costs of public transport, energy, waste recycling are affordable to citizens, taxpayers, and service users? The importance of this issue can be exemplified by a case that occurred in Mariupol, Ukraine, where the EBRD provided funds for the purchase of new trolleybuses. Although the project’s affordability analysis determined the project would provide services in line with affordability constraints, citizens were surprised when the city raised the cost of public transport, quoting running costs. Citizens claimed the decision did not take into account the affordability concerns of the public. Moreover, people complained that the cost increase was not related to the improvement of the quality of the public transport services. Thus, we suggest conducting analyses of the impacts of green solutions on vulnerable groups and individuals, in particular conducting affordability analyses that will inform the main challenges for vulnerable people to adjust to green solutions and how they could benefit from those instead of them being a burden for them.</p>	CEE Bankwatch Network	Agree vulnerability, affordability and informality are important. Reference to these issues has been strengthened in Sections 2, 4, 5 and 6 but will be further elaborated in an Annex providing more detail on business models.
General	<p>2. Incorporation of gender issues into the Sectoral Strategy. Chapter 5. Guidance for developing impactful GCF urban projects on pp. 34-35 states: “The project proponent must provide the expected environmental, social and health, and economic co-benefits. Also, it must provide an assessment of the gender impacts, which will aim to reduce gender inequalities in climate change impacts”. The Sectoral Strategy refers to GCF Programming Manual which mentions Gender Policy and Gender Action Plan as a required section in the proposal for funding. This guidance on gender impacts is welcome, although the focus could be strengthened by taking a stronger gender rights approach and making gender inclusion a cross-cutting theme in the Strategy. The Sectoral Strategy mentions the engagement of women in shaping solutions and developing policies (p.35) “Good project design will support proactive involvement of women in project planning and implementation and as the clear beneficiaries of targeted interventions”. Participation of women organizations, grass-roots groups in designing urban solutions as well as on the decision-making roles in infrastructure is crucial to ensure sustainable urban development, shaping cities as safer and healthier environments to live for us and future generations. However, besides participation criteria, the Strategy should also incorporate safeguards criteria guiding how women’s rights could be protected in the course of implementation of green solutions. One example of this challenge with the protection of women’s rights is Tbilisi Green City Action Plan (GCAP), developed within the Green Cities Facility and supported by the EBRD. Tbilisi put a lot of effort into establishing equal employment opportunities for men and women in the public transportation services, as a result of which more women become public transport drivers. At the same time, Tbilisi GCAP and project assessments did not address the common issues of sexual harassment in public transport since according to the research by ADB as of 2015, around 45% of women in Tbilisi reported they experienced some sort of sexual harassment in public transport in the previous six months. Thus, we suggest adding more robust policy requirements related to social and gender issues, such as the ones related to gender-based violence and harassment (GBVH)</p>	CEE Bankwatch Network	Gender response as row 9 above.

	requirements. In addition, GCF could explore examples of good practices in dealing with GBVH in various sub-sectors by other international financiers.		
General	<p>3. Information disclosure and meaningful public participation: GCF should have a comprehensive requirement for project promoters to ensure information disclosure, public participation, and stakeholder engagement. We suggest that the framework of funding for Cities, Buildings, and Urban Systems GCF includes rigorous criteria for information disclosure and public participation in order to ensure that city residents are aware of and participate in decision-making related to the improvement of their cities. Bankwatch research on “The EBRD and EIB’s Sustainable Municipal Infrastructure Investments in the Western Balkans and Eastern Neighbourhood” was conducted in 2019. Bankwatch surveyed 16 CSO representatives in the Western Balkans and non-EU Eastern Europe (Albania, Armenia, Azerbaijan, Belarus, Bosnia and Herzegovina, Georgia, Kosovo*, Moldova, Montenegro, North Macedonia, Serbia and Ukraine) about their experiences with EBRD- and EIB-funded projects in municipal infrastructure. We found that these lenders, although committed to green investments, were not able to hold local authorities accountable for ensuring transparency, public participation, strategically-guided development, the implementation of the most sustainable technology, and in some cases local laws or the terms of the projects. As a result, authorities may misuse such funding, failing to adequately plan and implement projects that are environmentally-friendly and support human rights. Two of the most pressing issues for our respondents were the transparency of the investments and project plans and the opportunity for meaningful public consultation on the projects, which often result in poor solutions being implemented. We recommended that public finance institutions invest more in capacity building at the municipal level, enforce more detailed conditions at the project and planning level, improve monitoring and oversight of projects, finance only those projects and plans which contribute to integrated, sustainable solutions for greening cities, and make a stronger commitment to ensuring human rights are protected in such projects.</p>	CEE Bankwatch Network	More detail on risks has been included in Section 7 and on community engagement in Sections 4, 5 and 7. Editing/ strategy issue
General	<p>Summary of Bankwatch recommendations: 1. We suggest incorporating robust impact assessments of GCF funding requirements for Cities on the vulnerable groups and individuals as well as measures to mitigate negative impacts (i.e. affordability analyses). 2. We propose establishing more rigorous policy requirements related to gender issues, in particular women participation, gender rights protection and safeguards, such as gender-based violence and harassment (GBVH) requirements. 3. Establishing clear transparency and stakeholder engagement criteria would help to meaningfully engage citizens in shaping green solutions for cities that would serve their needs and will make them active participants in developing their cities while ensuring sustainability and cohesion in the cities development. Affordability, inclusion, safeguards, transparency and participation need to find prominent place in the GCF Strategy, to ensure that it contributes to people-centered and sustainable urban development.</p>	CEE Bankwatch Network	Risk and risk mitigation strengthened in Section 7.

General	<p>The sectoral guide for the cities, buildings and urban systems document wisely states that there are a number of barriers that limit support for fostering new business models, institutions, technologies and financing structures and presents 4 paradigm-shifting pathways:</p> <p>1) decarbonizing the energy supply servicing the cities (through the use of renewables)</p> <p>2) construction of new, green buildings, with more energy conscious constructions, installations and appliances.</p> <p>3) more effective inter-modal operations, investment in mass transit and non-motorized transit systems, and vehicle electrification. The document states that a particular attention should be paid to ecosystems within urban areas, which provide important benefits by transforming resources (or environmental assets, including land, water, vegetation and atmosphere) into a flow of essential goods and services e.g. clean air, water, and food.</p> <p>4) Circular urban economy: a circular urban economy aims to keep resources in use for as long as possible, to extract maximum economic value from them whilst in use and keeping materials out of landfills and incinerators, and to minimize waste by recovering and regenerating products and materials at the end of their service life.</p> <p>And 4 drivers of paradigm shift: transformational planning and programming, coalitions and knowledge, catalysing climate innovation through new business models, mobilisation of finance at scale, and building coalitions and knowledge to scale up success.</p> <p>We think that this is a good start for reflection and subsequent action in this sector.</p>	Advisor to BM Marta Mulas	Thank you.
General	<p>1. The Sectoral Guides on Agriculture and Food Security and Cities, Building and Urban Systems are structured similarly and therefore, have the same strengths and weaknesses. 2. They go straight to the point of prescribing areas for focus, primarily: a choice among the enumerated paradigm shifting pathways and the identification of indicative residual barriers in achieving the climate objectives for the above two general thematic areas. Presumably, these are also the recommended focus of the country proposals for GCF funding. 3. However, there is a critical step or component missing in the Guides to provide developing countries with a systematic process of analyzing their own specific climate related problems and remaining hurdles. The Philippines views the prescriptions on climate responses, whether on greenhouse gas mitigation or adaptation reflected in the current iteration of the Sectoral Guides as incomplete. It is, therefore, recommended to include in the Guides a reference to and discussion on the assessment of country specific climate-related issues that proponents want addressed. If the guides are prescriptive on the paradigm shifting points/areas, it could be prescriptive in the use of specific tools and approaches in problem analysis to come up with country responsive proposals. 4. For example, if a country proponent wants to focus on mitigation, the main source of the actions to be applied support for would come from the country's Nationally Determined Contribution (NDC). If it is primarily on Adaptation, the proponent has to be guided on the need to use a particular analytical methodology and tools to identify systematically its adaptation related problems and potential fit for purpose intervention(s). As Adaptation seeks to be primarily anticipatory, not reactive, a risk management approach and methodology should be prescribed for the perfunctory analytics. 5. In sum, the Guides must be able to provide guidance in the design of the proposals in whatever sectoral concern eligible for GCF funding, in addition and incremental to those provided by the relevant GCF policy instruments on key result areas and investment criteria, among others. There is a need to align the needs of countries and the more prescriptive approach of GCF on particular focus areas through a pre-requisite analytics using assessment methodologies recognized globally as standard such as quantitative risk assessments.</p>	Alt Board Member, Ayman Shasly	<p>This is a good point - projects should relate to national NDCs. This has been mentioned in Sections 4 and 7 but now has been made explicit in Section 7.1. This is also a strategy issue impacting all guides</p>

General	<p>Second, in the Sector Guide of Cites, Buildings and Urban System: 1) We suggest to systematically analyse the obstacles and influences of technology, financing and capacity building for paradigm shift. 2) After consulting with ADB, we suggest to update and correct project information on the Shandong Green Development Programme. Please find attached the recommended revision. 3) Please double check the other two Chinese projects, "the Energy Efficiency Facility established by the Qingdao City government in China" in Table-5 paragraph 2, page 29 , and the project " Piloted by the Asian Development Bank in Xiantan, China" in footnote 23, page 35. We haven't found any information on Qingdao Project, and there is one ADB project in "Xiangtan" instead of "Xiantan". Therefore, we hope GCF could further check and clarify the projects mentioned in the Sector Guide.</p>	Advisor to BM Xia Lyu	Noted. Checked. Xiangtan reference deleted.
	<p>The potential of local materials is not sufficiently highlighted, while 75% of urban construction is still to come.</p> <p>The NBS dimension for a resilient city, especially to the risks of natural disasters related to global warming, also needs to be strengthened (note that the use of local materials, implying a restricted use of highly emissive materials such as glass/concrete/steel, also contributes to the mitigation objective).</p> <p>An addition on urban planning that integrates and rehabilitates informal housing would be adequate. Furthermore, the issue of housing and the problem of informal neighbourhoods is not mentioned. One of the consequences of growing and largely "unsustainable" urbanisation is the increase in informal neighbourhoods. It is crucial that the objectives of sustainable urban planning and more specifically the construction of "green" buildings take into account the housing dimension, as well as the objectives of access to essential services, which are of prime importance in informal settlements.</p> <p>The objectives of TOD (transit oriented development) could also mention the importance of linking informal urban areas (or even rural areas on the outskirts of cities, which are not mentioned) to formal areas in order to 'open up' certain neighbourhoods and participate in a more egalitarian and balanced urbanisation. This document appears to be not 'people-oriented' enough, especially in the analysis of the needs of cities and populations.</p> <p>Regrets in this respect that GlobalABC was not associated (ICLEI, C40 and UNDP) even though it brings together all the organisations in the building sector (Global ABC is a French initiative launched at COP21).</p> <p>A paragraph could be added on buildings in order to mention the global status report for buildings and construction of the GlobalABC (UNEP-IEA 2019), in the section "The importance of the Urban....". The Buildings and construction sector should be a primary target for GHG emissions mitigation efforts as it accounted for 39% of energy and process related emission in 2018 (direct 9%, indirect 19%, construction material industry 11%). Space heating, water heating and cooking continue to be the primary end-use energy demands in the buildings sector globally, but the fastest growing end uses are space cooling (demand rose more than 33% during 2010-2018), appliances and other plug loads. Total energy efficiency spending on buildings amounted to USD 139 billion in 2018.</p> <p>As the GABC-supported Energy Efficiency in Buildings Programme (EEBP) suggests, the key to progress in the building-buildings sector is to combine assistance to high-impact projects with institutional assistance: projects within a programme leading to a change in the sector supported by reform of the institutional framework. The financing of a favourable framework (a permanent institution for regulation and statistics on EE in the construction sector, training for professionals, a contractual framework for sharing responsibilities) is particularly necessary in a highly fragmented and not very internationalised sector. Add in figure 1 of executive summary, in mobilisation finance at scale "in the buildings and construction sector strength blend finance articulating project and policy assistance to maximize impact".</p>	Stephane Cienniewski, Alternate Board Member	<p>Agree. Have included reference in section 4.1.</p> <p>Included references to local materials in section 4.1 on ecosystem services</p> <p>The climate aspects of housing are addressed under green buildings in section 4.1 but understand the importance of wider social benefits and it is important that they be included in the design of climate projects and should be detailed under "cobenefits" in Section 7.3. This section has been amended to address this.</p> <p>As above and the issue of informality is picked up in Section 4.4 and business models in Section 5.3. It will also be addressed in the Annexes.</p>

	First and foremost, we expect the Sectorial Guides to be accurate, concise, targeted and problem-solving, so that it can provide real guidance to GCF's sectoral operations.	China Board Member	Text included
Executive Summary	Opening paragraph clearly defines what the guide is about	Executive Director, Climate Markets & Investment Association	Thank you
Executive Summary	Background information is detailed enough to provide an effective overview of Cities, Building, and Urban Sector, and the role of the GCF in financing paradigm shifting pathways	Executive Director, Climate Markets & Investment Association	Thank you
Executive Summary	Unprecedented investment opportunity should be highlighted more as this will resonate with the private sector. Perhaps consider creating a breakout box with stats on what's needed and where. The information is already in the document but a breakout box allows for the reader to gain insight into the magnitude if it's highlighted in a small excel type of breakout box. Or maybe put it in the Introduction	Executive Director, Climate Markets & Investment Association	The presence of an unprecedented investment opportunity is true, but building out the case for this would require more space than is available in the standard format. The Annexes will expand on business models that will include the opportunities for the private sector.
Executive Summary	Suggest to define "paradigm shift" in a specific breakout box for all parties to understand. For the private sector, we suggest defining it as something like "systemic change" as the PS understands systems thinking well, but will struggle to understand the term paradigm shifting - even though you do define it and linking it to 'systems thinking' will make PS better understand the interconnectedness and how the GCF wants the transformation of entire systems - not just one technology	Executive Director, Climate Markets & Investment Association	Editing issue for all guides
Executive Summary	Figure 1 pg 4 is good to explain what PSP drivers are for the GCF	Executive Director, Climate Markets & Investment Association	Thank you
Executive Summary	There is no mention of the SDGs in the ES, although they appear in the full guide document.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Mentioned in the summary table in the ES, due to format and space constraints.
Executive Summary	The consistent use of mega/large and secondary cities throughout the guide to segregate the types of cities is not helpful. The source and methodology of this definition is not referenced, and it may not have considered other crucial components that characterise a city that is not purely from the size dimension.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Noted. Disagree the distinction is not helpful and has been further defined.

Executive Summary	It is unclear from this document who was part of the "communities of practice," how they were consulted, and how their concerns were integrated. For example, architects and city planners should be a part of the consulted stakeholders as they will be key actors in implementing and developing such projects and programmes. Have they been engaged? How will this guidance actually get driven and taken up by these practitioners in the project/programme development process?	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Consultations done through UN peak body (UNHabitat). The Partnership strategy in forthcoming Annex will describe how future engagement is to be undertaken in the sector.
Executive Summary	A key barrier that should be listed here is the lack of transparency, responsiveness, and engagement of local governments to residents' concerns, ideas, experiences, and resources. Good governance is a key prerequisite for transforming cityscapes into more climate resilient urban systems that promote and protect the human rights and resiliency of their residents.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Community consultation references have been strengthened in Sections 4, 5 and 7. More detail will be provided in Annexes.
Executive Summary	In line with our overarching comments, "Coalitions and knowledge to scale up success" must include and take advantage of local community groups and other civil society organizations. Coalitions that focus on top-down networks of high-level policymakers, for example, will fail to unlock and share key insights necessary for true transformation.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	As above
Executive Summary	<p>The way that Covid-19 could shape the future urban development landscape, both in the existing megacities and emerging secondary cities, is not well-discussed in the guide. It only noted in general the need to support developing countries in pursuing a climate-resilient recovery through the advocated paradigm-shifting pathways (pages 2, 15).</p> <p>For instance, the pre-Covid-19 view favoring compact and dense urban designs (one of the four paradigm shifting pathways described, page 12) may need to be revisited with a view to the vulnerabilities that dense cities exposed during the pandemic.</p> <p>For example, page 13 notes that with an 8% increase in average density, transit-oriented development could attain 13% of 2030 emission targets in large, low-income cities. While transit development is a worthwhile goal for reducing emissions (and making the city run more efficiently), linking it with densification of urban development may need to be reassessed post-Covid-19.</p>	Asian Development Bank	Agree that COVID may change many things in relation to the institutions and financing of urban development but too early to determine detail.
Executive Summary	<p>In the Barriers section, two more potential barriers to be considered (addressed):</p> <ul style="list-style-type: none"> • Fragmentation and complexity of the governance. Energy Efficiency is an area that cuts across many different parts of government, there is a notable gap in coordination between different parts. • In less developed regions, underdeveloped supply chains, which prevents the uptake of advanced EE technologies. • The lack of aggregation models for small projects. 	Climate Finance Associate, E2C2 at EBRD	Different governance arrangements are now discussed in Sections 4, 5 and 7. Referene to supply chanins added in Section 4. Aggregation mechanisms are mentioned in Section 5 but will be elaborated in Annex.

Executive Summary	<p>"While mega and large cities constitute and immediate potential for reduction in emissions, secondary cities are vital to breaking dependency on high-carbon development as they grow to large cities."</p> <p>Very much welcome the acknowledgement of the secondary cities, which in spite of their vital role are often not supported. Consider to add this. Some facts and statistics for inspiration: https://www.citiesalliance.org/how-we-work/our-themes/secondary-cities</p>	Head of Innovative Finance, ICLEI	Noted. Thank you.
Executive Summary	<p>"Cities also require the implementation of adaptation measures to enhance resilience."</p> <p>Suggest to add 2 thoughts:</p> <ol style="list-style-type: none"> 1. adaptation finance remains very low 2. the Covid-19 pandemic highlighted the importance of urban resilience 	Head of Innovative Finance, ICLEI	Adaptation finance now noted as low in ES and further elaborated in 4 and 5. COVID and resilience linked in ES and Section 4 but comment as above Row 40.
Executive Summary	<p>"Coalitions and knowledge to scale up success: Generate and disseminate knowledge across the GCF urban sector project portfolio, leverage partnerships with urban networks and coalitions to share lessons learned and replicate good practices in order to reach scale. "</p> <p>Based on experience knowledge exchange between local governments is also very useful and inspiring.</p>	Head of Innovative Finance, ICLEI	Noted and local governments are mentioned in Table 1 but now peer to peer mechanisms explicitly mentioned in Table 3. Thank you for pointing this out. Will be elaborated in Partnership strategy in Annex.
Executive Summary	<p>Paradigm shifting pathways (PSP) – Figure 1 of the Executive Summary.</p> <p>The 4 Paradigm Shifting Pathways (PSPs) as presented appear very sectoral in approach, and even within these different sectors the sectoral strategy narrows down to specific technologies, at least in the examples given. For example, in the Decarbonised & distributed energy paradigm pathway the focus seems to be only on solar PV and does not include examples of other viable technologies.</p> <p>In the PSP on the Compact & resilient urban form and Circular economy the primary focus is on transport and waste in the examples. This again gives the impression of a very narrow sectoral approach. Both Compact & resilient urban form and Circular economy PSPs are by their nature multi-sectoral and much more comprehensive than these two individual sectors.</p> <p>Recommendation 1: make it clear that all appropriate distributed energy generating technologies are eligible in the Decarbonised & distributed energy PSP.</p>	UNEP	<p>Agree with these sentiments .</p> <p>The business models suggested are indeed sector specific because markets are generally sectoral, but it is essential that financing mechanisms (and planning and project development systems that feed them with projects are multi-sectoral where possible. Facility mechanisms can be structured to address this - as described in Section 5 and will be elaborated in Annex.</p>

Executive Summary	<p>Recommendation 2: Make it clear that the Compact & resilient urban form PSP is multi sectoral, and must take an integrated approach, and should emphasize much more strongly the planning, policy and capacity building elements to support integrated compact & resilient urban form planning and investment. The examples should depict a more integrated intervention approach.</p> <p>For example, in a compact and resilient low-emission zone there are many sector opportunities that could be captured by a GCF project, including the other 3 PSPs. For example, reducing traffic and promoting non-motorized transport (NMT) in an area opens up many additional opportunities for emissions reductions such as: using green cover to promote shade, improve air quality and address heat island effects. This in turn can promote behaviour change, allowing city inhabitants to use the outdoor space more effectively. Business can benefit by placing street furniture outside for customers, and the cleaner quieter environment allows for more recreational opportunities. This sort of approach can also impact behaviour in buildings, allowing inhabitants to use natural ventilation and reducing the need for cooling and heating demand. Reconfiguring street architecture also gives opportunities to improve lighting and security and can provide space for recycle and separating waste at source. In a circular economy separating organic waste at source reduces the likelihood of contamination and make composting simpler, which in turn can be used for peri-urban food production and as fertiliser for green spaces, green belts (to contain urban sprawl, for instance) and networks in and around the city. It also gives an opportunity to increase the resilience of the area against other climate impacts such as flood control. Creating additional outdoor space also means that residential and commercial areas can absorb an additional number of people creating opportunities to densify buildings (through changes in Land-Use Planning and building codes) without sacrificing quality of life. Much of this joined up thinking is emerging best practices. Planners typically still address mobility, and congestion by expanding street space to allow for the free movement of cars. Shifting movement to public transport, bikes, scooters and other lower impact forms of transport is thinking that still needs to percolate into mind set of many city planners and still requires capacity building and behaviour change.</p>	UNEP	As above
Executive Summary	<p>Urban areas are complex in nature and require holistic & comprehensive solutions and investments to achieve a paradigm shift. Therefore, we believe that GCF funded projects need to be designed in an integrated manner that combines strategic planning, policy reform, institutional strengthening & coordination, technical assistance, value chain, capacity-building & awareness raising components to allow sustainability and successful scaling up to achieve low emissions & resilient urban development.</p> <p>Recommendation: In order to capture the points above, we would like to suggest re-wording 2 of the 4 paradigm drivers to make it explicit, clear and encompassing that the GCF funded projects should look into these components and include a sub-heading with all areas that the drivers should be focusing on. Suggested wording for:</p> <p>Transformational planning and programming: Change to: Transformational institutional, policy and planning environments (including aspects on strategic and integrated planning, policy and tax reforms, institutional and regulatory systems strengthening, technical assistance, value chain interventions and capacity building)</p> <p>Coalitions and knowledge to scale up success: Change to: Knowledge sharing, awareness raising and behaviour change to sustain and expand impacts</p>	UNEP	Editing issue across all Guides
Executive Summary	<p>In the Barriers section, there is no mention of end-user engagement, understanding, or acceptance. This is often a challenge and should be considered. Recommendation: add the role of the city inhabitants in changing their behaviour to ensure impact in the fourth driver - Coalitions and knowledge for scale up success.</p>	UNEP	Indeed. Section 4 amended.

Executive Summary	The main challenges we have in Brazilian cities, are making urban development policies compatible with the planning of mobility systems; the lack of perennial policies for financing public transport infrastructure; the absence of measures to rationalize the use of individual cars and the aging of the population itself and the impact on peoples mobility conditions.	Brazilian NDA	Table 3 amended to emphasise integrated systems - but there is a treansprt guide that will go into more detail.
Executive Summary	The presence of urban parks is very relevant when we thinb about mobility as it makes people prioritize walking or cycling over short distances instead of taking the car out of the garage, which helps in more sustainable mobility and makes the city more clean of pollutants and less noisy.	Brazilian NDA	Issue of city greening introduced into Table 3.
Executive Summary	It is suggested to add a great difficulty currently found for integrated urban planning: the data are aggregated mainly at the national level and in addition, the data are often isolated from each other, while many decisions at the local level depend on the articulation of different information layers and furthermore need more detail. Spatial decisions, from where to construct a particular building, or decisions for example about the coronavirus and any epidemic or pandemic would benefit greatly from these types of information, it is not by chance that cities considered smart and sustainable have a common feature of being highly planned. And now during the pandemic, the remote and strategic management of data and information has become even more important not only for public managers, but also businessmen, control bodies and the society itself.	Brazilian NDA	Data issues are related to the discussion on Driver 1 Planning and programing and in the ES and Sections 4 and 7.
Executive Summary	One of the big problems is that municipal master plans are traditionally developed with the support of specific consultants, dependent on financial support often provided by sources outside the municipal budget and neither society nor municipal managers take ownership of these plans. Thus, empowering cities and citizens is essential for the success of any policy.	Brazilian NDA	Agree, but planning issues, including fragmented responsibility, are discussed in Section 4.
Executive Summary	That is a topic of great complexity and relevance that requires multifocal and coordinated action by the Public Power for a unique taxonomy	Brazilian NDA	Agree
Executive Summary	we need to empower cities with more granular, more detailed and regularly updated data flows, and thus provide better evidence for decision-making and better services for citizens.	Brazilian NDA	Agree. See Section 4 and will be discussed further in the Partnership strategy that will be set out in an Annex
Executive Summary	As for technology, the major contribution that it, research and innovation can make are the potential gains in efficiency in urban processes, thus reducing the environmental and climatic impact of cities. The use of hybrid technological solutions, which take into account low-cost technologies and which include the convergence of various sectors of the economy and areas of study such as biotechnology, electronics, information technology, mechanics, etc., also allow the use of biodiversity, the maintenance of environmental services in cities, greater climate resilience and thus more well-being and quality of life in cities. It is necessary to provide and disseminate solutions for the main gaps and frontiers of knowledges that enable the sustainability of the cities.	Brazilian NDA	As above
Executive Summary	There are several dissemination platforms and different policies for urban development that can be applied in cities with this environmental concern, such as the construction processes of urban infrastructures, which we can insert green infrastructures, the implementation of environmental impact mitigation measures, meeting the housing deficit and even promoting new public spaces. These types of policies should be further developed on a sustainable way and good practices disseminated through municipal associations and platforms that already exist and can be strengthened.	Brazilian NDA	As above
Executive Summary	These are the right mitigation priorities, however (as an above paragraph mentioned) there also needs to be a focus on adaptation measures. i.e. air quality, water including flooding, landslides etc – of which many cities in developing countries are vulnerable	Advisor to BM Josceline Wheatley	Agree,. Ada[tation now further detailed in ES and Sections 4 and 5.
Executive Summary	Think it is worth mentioning the trade-offs in buildings sector; namely the demand for affordable housing to be built at pace, and the higher costs and planning requirements of energy efficient homes.	Advisor to BM Josceline Wheatley	Agree this is an issue. Affordability now included in Section 5

Executive Summary	Are these drivers or perhaps more things that the GCF does or seeks to do?	Advisor to BM Josceline Wheatley	Both
Executive Summary	In China 70% of the population will live in cities already by 2030 – this is a planned urbanisation	Denmark Ministry of Foreign Affairs	Noted
Executive Summary	Water, you seem to forget the importance of water in mega cities and the need for development resilience when it comes to water sources i.e. protection of ground water, climate change adaptation, waste water management (making carbon neutral Waste water treatment plants that can also be circular)	Denmark Ministry of Foreign Affairs	Point taken. There will be a separate Water Guide, but the topic is discussed in respect to business models in Table 3 but will need to be amplified in Annexes.
Executive Summary	If you truly want cities to engage – a bottom up approach that actually includes cities, local governments and urban citizens themselves are essential.	Denmark Ministry of Foreign Affairs	Included in Sections 4, 5 and 7
Executive Summary	Water as a mitigation area that overlaps with adaptation efforts – low emissions access to safe water	Denmark Ministry of Foreign Affairs	Included in Table 3
Executive Summary	Decarbonization of urban energy systems can also be achieved with other measures, not only through “scaling up distributed renewable energy”.	Board Member	Agree. Table 3 amended to include but Energy Guide will elaborate.
Executive Summary	We would suggest to include also other examples further to solar PV, e.g. solar thermal energy is another example.	Board Member	Added in Table 3.
Executive Summary	We believe Energy efficiency in building stocks should always be viewed as the starting point and should be considered the top priority intervention compared to other ones.	Board Member	Agree.
Executive Summary	The limited information on best practices is often not only linked to their limited dissemination, but to the actual lack of best practice itself. Funds are needed to realize best practices and thus generating economies of scale. Additionally, it is important to promote users' involvement, as they should be willing to move towards new solutions that are different to standard/baseline technologies.	Board Member	Noted
Executive Summary	The priority of developing a framework which appeals to the private sector is mandatory. Leveraging different kind of investments could definitely scale up the objectives and the final results achievable.	Board Member	Noted
Executive Summary	Is there an author of the report, please consider using the name of the author of the report for the citation. Here and elsewhere, references to other reports and documents should have urls and/or hyperlinks.	GCF Secretariat	We do this where the author is nominated in our source.
Executive Summary	Consistent presentation of numbers and percentages	GCF Secretariat	Edit issue
Executive Summary	Are we using footnotes	GCF Secretariat	Edit issue. At present only for technical explanations or examples.
Executive Summary	“levels of more than 1.5° C”	GCF Secretariat	Corrected. Is "less than"
Executive Summary	Delete text	GCF Secretariat	Edit issue
Executive Summary	Replace currently with the year these figures refer to.	GCF Secretariat	Corrected.
Executive Summary	I am not sure what these sentences are saying.	GCF Secretariat	Reworded.

Executive Summary	this is not the abbreviation	GCF Secretariat	Corrected
Executive Summary	Sources should be added for the calculations	Stephane Cienniewski, Alternate Board Member	Corrected
Executive Summary	+ Decentralisation of management at LC level with tariff deregulation (end of tariff equalisation). It requires regulatory and tariff adjustment. Funds allocated directly to the LCs concerned, with possible state guarantees and accompanied by a technical assistance to ensure the municipality's technical and financial management capacity (concessions, maintenance, tariff setting).	Stephane Cienniewski, Alternate Board Member	True. This is one of the effective structures for efficient and sustainable implementation of projects. It is too much detail for the overview Guide but will be addressed in Annexes
Executive Summary	The document seems to mainly focus on transport of people. Transport of goods exists in cities (urban freight), but there are options to reduce its impact: installation of zero- or low-emission urban zones, non-motorised or zero emission last mile delivery options, zero emission vehicles, improvement of inter-modality...	Stephane Cienniewski, Alternate Board Member	The Guide does address NMT and other issues of zero emission transport in general but sections ... and ... have been amended to refer to freight. More detail is inappropriate for an overview Guide and given there will be a separate Transport Guide
Executive Summary	If these figures exist, it would be interesting to know how they vary according to the 'mega cities' and 'secondary cities' which are differentiated in the first part of the document.	Stephane Cienniewski, Alternate Board Member	Agree. Will investigate and add into Annexes as appropriate.
Executive Summary	Promote the potential of locally sourced geo and bio-sourced materials for the construction of bioclimatic buildings. Supporting projects that develop training, the strengthening of the sectors and the scaling up of this use through extension or urban rehabilitation programmes (especially in informal neighbourhoods). Support for the definition of standards and labels in developing countries is likely to help in this respect. A massive Green Fund project in this sector, combining all the dimensions mentioned above, is likely to be a "game changer", especially if it also demonstrates a lower cost of ownership compared to traditional "cement, iron, glass" solutions, better comfort, and good durability compared to extreme weather events. Furthermore, in both documents, a large part is given to the need to rehabilitate existing buildings. But given that 75% of urban construction by 2050 is still to be achieved and that it will mainly concern developing countries, it is on this dimension that we must start to act massively and quickly to achieve carbon neutrality. It seems that this "local materials" dimension is not present enough in the 2 documents.	Stephane Cienniewski, Alternate Board Member	Agree, Included in the Exec Sum and in Section 4.1
Executive Summary	Sourcing local and sustainable materials for constructions undertaken in this context is also part of the objectives mentioned in the SDGs, in particular SDG n°11.	Stephane Cienniewski, Alternate Board Member	Agree. As above.
Executive Summary	The document seems to mainly focus on transport of people. Transport of goods exists in cities (urban freight), but there are options to reduce its impact: installation of zero- or low-emission urban zones, non-motorised or zero emission last mile delivery options, zero emission vehicles, improvement of inter-modality...	Stephane Cienniewski, Alternate Board Member	Repeat comment
Executive Summary	It should be acknowledge that some of them are also constrained by national frameworks or higher level of governance, which prevents them from taking such initiatives. On the other hand, many do not have the human resources and adequate training to undertake these changes.	Stephane Cienniewski, Alternate Board Member	Agree, Clarified in Exec Sum and Section 4.2

Executive Summary	Integrate externalities and co-benefits into NBS projects, to show the interest of these solutions in the long term and their compatibility with the 'do no harm' and 'no regret' principles.	Stephane Cienniewski, Alternate Board Member	Not just NBS projects. The Investment Framework includes a requirement for Economic CBA which should include externalities for ALL projects.
Executive Summary	The agriculture guide also includes enablers.	GCF Secretariat	Enablers are discussed under partnerships in this Guide - needs to be more generic given the multi-sectoral nature of urban but will be further detailed in Annex on partnership strategy
Executive Summary	Figure 1 includes references to "NAP", "SDG" and "TAF" – these should be in the abbreviations.	GCF Secretariat	Corrected.
Executive Summary	<p>The sector guides are well-structured and provide a good overview of the sectors. We especially appreciate the emphasis on creating an "enabling environment," which involves engagement with various community members.</p> <p>However, we noticed that the draft sector guides lack information about sector-specific environmental and social risks and mitigation strategies to minimize risks. For example, projects or programmes to develop climate-friendly cities, buildings and urban systems may have their own environmental and social consequences, such as fragmentation of wildlife habitat, introduction of invasive species, extreme urbanization, involuntary resettlement, and air pollution, etc. Similarly, projects/programmes in the agriculture and food security sector may also produce adverse impacts, such as loss of biodiversity, water contamination, child labour, involuntary resettlement, indigenous people's rights and customs and territorial claims, etc. We believe that anyone interested in receiving funding from the GCF to implement projects/programmes should be aware of the potential environmental and social safeguards (ESS) and risks relevant to the sector in order to develop a well-planned funding proposal acceptable to the GCF.</p> <p>From our review of similar documents published by other international financial institutions, we found that many of them cover ESS risks. For instance, IFC's utility-Scale Solar Photovoltaic Power Plants: A Project Developer's Guide is very technical but discusses the basics of ESS and the potential risks relevant to this sector, such as biodiversity, land acquisition, cultural heritage, indigenous peoples, etc. Also, World Bank's GOOD PRACTICE HANDBOOK - Environmental Flows for Hydropower Projects: Guidance for the Private Sector in Emerging Markets gives examples of potential risks such as the projects' impact on tourism and communities' spiritual use, etc. We believe that GCF sector guides should also provide examples of relevant social and environmental risks and the ways to mitigate those risks.</p> <p>An alternative to including such risks in the sector guide itself may be the</p>	Head Independent Redress Mechanism, Green Climate Fund	<p>Risk issue is reinforced in Section 7.7 of the Guide but will also be addressed in Annexes</p> <p>Also editing and strategy issue in relation to ESS safeguards guide</p>

	<p>An alternative to including such risks in the sector guide itself may be the production of a companion guidebook that addressed ESS and related risks and migratory and avoidance measures. We have found examples of such companion guide books published by the IFC and EBRD. IFC has published the Environmental and Social Management System (ESMS) Implementation Handbook on a few different sectors such as construction, animal production, crop production, etc. The EBRD has also produced Sub-sectoral Environmental and Social Guidelines on different topics such as construction, Hmber and wood products, transport, etc. Such guidebooks would allow the project implementers to identify major risks, develop management actions and consider the vast scope of potential risks that may stem from implementing GCF funded activities in specific sectors.</p> <p>In our view, having ESS and risks addressed in a single guide is much more convenient and effective from a project developers point of view and urge you to consider including such a section in the two grant guides as well as in future drafts of other GCF sector guides. We are concerned that not doing so, may, in the long term, potentially increase the complaints that the IRM may receive from project affected people.</p>		
Executive Summary	When identifying the paradigm-shifting pathways: the first one deals with energy provision, the second one with housing, the last one with waste management, and the third one is an unclear mix of transport and urban planning. Audience is different, the approach is different, and a better definition and identification of how urban development can contribute to adaptation and mitigation is missed throughout all the document.	Head of sector Transport and Urban Development, UfM	Need to differentiate from other Guides (Energy etc) implies partial coverage of the issue in this Guide. Indeed the urban Guide has to address a wide range of stakeholders that vary across countries. The business models in Section 5.3 seek to provide flexible approaches to structuring investment appropriate in different circumstances
Executive Summary	The document mentions "provisions for compact urban growth" but then the idea disappears in the paragraph afterwards and it is not explaining anywhere "how provisions for compact urban growth" are expected to be promoted.	Head of sector Transport and Urban Development, UfM	Table 6 Section 5.3 provides some models but these will be further developed in the Annexes
Executive Summary	In my opinion references to "nature-based solutions" are missed, as well as references to identification and addressing of urban risks related to floods, sea-level rise, developments linked to fresh water resources and urban mobility plans, and the promotion of urban regeneration projects as a way to promote densification vs new developments	Head of sector Transport and Urban Development, UfM	Agree. As above.
Executive summary	Barriers to achieving PSPs in the Urban Sector - Lack of enabling policy frameworks, integrated policy and planning systems and institutional capacity: the lack of institutional capacities is manifested both in the development of such policy/planning systems but more frequently there is a lack of capacity in enforcing said policy. This is often the case in developing states in the field of waste management, pollution prevention and control, etc, where good policy is sometimes drafted based on international models, but enforcement is lacking.	RWA Group SCE, Green Partners Ltd.	Agree. Addressed in Section 4.2 and will further develop in Annexes

Executive summary	<p>1) The paper presents a convincing storyline on the importance of the “urban sector” in climate mitigation and adaptation efforts. The four paradigms cover most topics relevant to CC in urban areas.</p> <p>2) The linkages between the four paradigms are to a large extent absent in the document and would need to be elaborated.</p> <p>3) The added value and complementarity of the GCF with existing urban initiatives from development financial institutions (DFIs) are to be demonstrated. There is an increasing number of urban-climate initiatives and funds from MDBs and other institutions. The risk of overlap with existing initiatives is significant. A chapter that would further elaborate on the complementarity of GCF urban approach with those of existing initiatives would be valuable.</p>	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	<p>Thank you</p> <p>Linkages across the four pathways are institutional and financial and vary across the cities and countries. The approach of the Guide in response is to identify financing structures that can support a range of institutions - including the implementation of multi-sectoral investment programs. TA needs to support the formulation of such programs. This is addressed in Section 5.3 GCF value add is also addressed in Section 5.3 and will be further developed in the Annexes</p>
Executive summary	<p>Should also distinguish between mature and emerging/expanding cities. Mature cities have more limited options, whereas expanding cities have a window of opportunity to embed mitigation plans into their development plans and a greater potential to build a low emission trajectory.</p> <p>Cities that fail to invest in low carbon option to meet infrastructure demands will be locked into an emission intensive pathway for a long time. Emerging and expanding cities can avoid such lock-in</p>		<p>Different business models for retrofit and new development address this issue - see section 5.3</p>
Executive summary	<p>"Lack of vertical and horizontal coordination between sectoral, municipal and national institutions"</p> <p>Comment: Any action at the local level needs to be vertically integrated with national and subnational policies and programs. Absence of coordinated vertical aligned processes can result in slow or inconsistent implementation of mitigation actions. Cities will be influenced by national policies. Lack of horizontal coordination can hamper focus on improved resource efficiency and waste prevention instead of cleaning-up solution in a linear economy.</p>		<p>Agree. Clarified in Exec Sum and in Section 4.2</p>
Executive summary	Lack of creditworthiness, insufficient access to capital markets		Included creditworthiness in Section 4.2
Executive summary	As a reader, I was confused as the true audience for the document. Yes, it is written to be an internal framing piece to organize investments for cities, buildings and urban systems. That makes sense, but without a clear understanding of who the interventions will seek to impact, I wonder about the ultimate effectiveness of such a document.	USAID	The audience for the Guide is GCF project proponents and AEs. In this context the Guide has to be general to be widely applicable, but more specific guidance and examples will be included in the Annexes.
Executive summary	The one section that I found lacking was implementation. To be fair, the document states that the "how-to" content will be in annexes to be developed. Please ensure that the annexes address this point about implementation.	USAID	Implementation issues are covered briefly in Section 7.5 but will be further addressed in the Annexes.

Executive Summary	There is no mention of COVID-19 as a factor. While it is not a focus of this issue, I think acknowledging its impact on development particularly related to resource allocation would be prudent.	USAID	COVID is mentioned but as the final impact is not yet clear the Guide only flags the issue. Other GCF documents are building a response as the situation evolves.
Executive Summary	The framing of paradigm shifts for compact and resilient urban development should also include more of a discussion of urban design and land use planning to demonstrate how compact development can shift modes of transport. Yes, there is mention of mode shift in the document, but I think its application needs to be more broad. It's not just about reducing vehicular traffic in existing land use patterns, but also reorganizing land uses to accentuate walkability, shared ingress/egress, etc. Again, the tone speaks to a more developed city or urban context, and applications of compact development should be commensurate throughout the urban typology.	USAID	Agree. Text added in Section 4.1
Executive Summary	EE is part of decarbonisation (RE is not exclusively a decarbonisation strategy). EE is also the "first fuel" and should be listed first—it's cheaper and must be deployed in equal measure to RE for RE to be affordable and feasible. Also recommend discussing building electrification within one or both of these points.	USAID	Edit issue? The concept was to structure the document to address generation first then to address use. But the "first fuel" issue is valid and is included in Section 4.1 Agree. Building electrification added to Exec Sum and Section 4.1
Executive Summary	Recommend also mentioning other more impactful measures, like using heat pumps and super efficient AC.	USAID	Included in Section 4.1
Executive Summary	The main barrier is deeper than the listed barriers. Many developing cities either do not have the authority to borrow or they are simply too risky. They typically can't issue bonds for public finance. In order for the GCF to penetrate to the city level, some fundamental issues on city public finance need to be worked out (do they even have the financial systems in place to accept finance of this nature?).	USAID	The issue is important and addressed in Sections 4.2 and 5.3 and will be further addressed in the Annexes
Executive Summary	There is tremendous public finance capacity building that is required for climate finance to flow to cities at scale. Perhaps GCF should work with donors and MDBs to align technical assistance and governance programs with climate funds availability.	USAID	Agree. This is addressed in the fourth driver of paradigm shift relating to coalitions discussed in the Exec Sum (table) and in Section 4.3 but will be further elaborated in the partnership strategy in the Annexes
Executive Summary	Overall, very comprehensive, well -structured and clearly written strategy. Particularly appreciated is the strong focus on partnerships/coalitions/networks like e.g. CCFLA as an important driver for the paradigm shifting pathways ("Coalitions and knowledge to scale up success). Are there going to be follow-up products/additions to this strategy that set out in more detail how the GCF intends to work together with partners to achieve the broader GCF strategy goals and to support countries and their cities transition to a low-carbon climate resilient economy?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Thank you. As above a more detailed partnership strategy will be in the Annexes

Executive Summary	<p>The annexes seem very relevant to guide proposal development as well if they contain strategies or more details on how to hit/implement the action fields. Guidelines and tools for sustainable waste management and circular economy that could serve as references include:</p> <ul style="list-style-type: none"> -Sectoral implementation of nationally determined contributions (NDCs) - Circular economy and solid waste management (GIZ 2017) (PDF, 1.06MB, EN) -Waste-to-Energy Options in Municipal Solid Waste Management (GIZ 2017) (PDF, 1.99MB, EN) -Guidelines on Pre- and Co-processing of Waste in Cement Production (GIZ 2020) (PDF, 6.02MB, EN) -Tool for Calculating Greenhouse Gases in Solid Waste Management (KfW/IFEU/BMZ/GIZ 2009) (XLS, 3.09MB, EN) and manual (KfW/IFEU/BMZ/GIZ 2009) (PDF, 1.70MB, EN) -Tool for Rapid Assessment of Waste Flows in Cities (UoL/EAWAG/GIZ 2020) <p>Additionally, the tools and support of the NDCP should be referenced (e.g. C40 GHG assessment, SWEET (supported by UBA – CCAC), or IGES GHG calculator).</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Noted and will include in the Annexes
Executive Summary	<p>Simpler/for communication: Cities: 80% of world's GDP, 70% of emissions, 50% of population http://www.worldbank.org/en/topic/urbandevelopment/overview 54% of population by now? 60% of population by 2030 (United Nations, 2014: World Urbanization Prospects: The 2014 Revision. Available at: https://esa.un.org/unpd/wup/)</p> <p>70 % emissions https://unhabitat.org/?mbt_book=cities-and-climate-change-global-report-on-human-settlements-2011</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Thank you for the references will include as appropriate but the idea here was to emphasise the emissions reduction potential in energy.
Executive Summary	<p>The term “secondary cities” means something very specific. In this document it seems to be used in a more general sense for any medium-sized or smaller city that is not mega or large or primary. We suggest a rewording throughout the document. page 1</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Correct. We have departed slightly from the general use of the term and carefully redefined the term to be more appropriate to the financially-focused circumstances under which the GCF operates.
Executive summary	<p>As this guide is supposed to cover cities, buildings and urban systems, we strongly encourage you to include some facts and figures on the building and construction sector as well. This paragraph is exemplary. Key facts may also be integrated elsewhere in the introduction. For further information and data, you may want to check: https://globalabc.org/resources/publications</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Noted with thanks and will integrate into Section 2.1
Executive summary	inhabitant	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Incorrect - there is more than one inhabitant and the word is not a collective noun.

Executive Summary	<p>Suggests to add: "preparation and"</p> <p>Comment: A large amount of the opportunity for action, against the described background of mitigation and adaptation efforts, lies in regulatory frameworks and planning processes that need to be significantly improved in order to guide investments. This should be adequately reflected in the text.</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Unclear. Preparation discussed under "barriers" in Exec Sum and Section 4.2 Agree, Addressed in changes to Exec Sum and Section 4.2
Executive Summary	<p>Suggests to add: "well"</p> <p>Comment: Please use well-below 2°C throughout the report, with a reference to the 1.5°C max. temperature as well!</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Unclear. Editing issue.
Executive Summary	Here a similar sentence/paragraph should be added of how large the estimate is on what cost of destruction/climate-impacts could be avoided in cities by taking climate adaptation needs into account asap and increasing climate resilience significantly.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	The figure cited includes climate impacts so adding an additional figure for adaptation only both duplicates and confuses in the Exec Sum. Such figures are quoted in Section 3.1
Executive Summary	Suggests to add 'transport system'	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	In this context "transport" is included under "infrastructure" - transport is indeed important and has its own Guide
Executive summary	We welcome and agree with these four main paradigm shifting pathways.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Thank you.
Executive Summary	Transport is missing from below, although cities have large influence here.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. But see above.
Executive Summary	<p>There are a related topics not explicitly mentioned here --</p> <ul style="list-style-type: none"> - electrification of buildings (heating and cooling, eg through heat pumps) and transportation as a means to reduce emissions, but also support other goals such as reduced air pollution. - The "smart cities" / "smart grid" concept -- and the associated grid infrastructure improvements -- where cities move towards integrated energy systems using smart grid technologies, allowing, for instance, demand response approaches to avoid peak loads, integration of EVs with the grid system, and increased energy storage capacity to manage power demand in real time. 	US Department of State	Have incorporated references to all in various sections except Smart Cities which are an IT enabled compendium of all the measures set out in this Guide plus others. Such linkages and cobenefits of related economic development should be discussed in the FP as detailed in Section 7.3

Executive summary	Most Energy supply legislation is done at the national level. Influence of cities is smaller here. Hence suggest to move this back.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Indeed. This is why this Guide focuses on distributed energy on which cities have at least some influence. There is separate RE Guide
Executive summary	Suggest deleting: "Scaling up distributed renewable energy in 60 countries with carbon intensive power systems by tripling the current installed capacity of solar PV would reduce GHG emissions by 108 Mt CO ₂ e, an amount equivalent to the total annual emissions of Belgium in 2012."	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Do not understand the objection.
Executive summary	GCF can help with finance measures that assist with upfront costs for EE retrofits, which often act as a barrier to improving EE even though there are long term savings.	US Department of State	Agree. Set out in business models in Section 5.3
Executive Summary	<p>I recommend to add somewhere that the buildings are only one of several (while most likely the biggest) city-related option for energy efficiency measures.</p> <p>It would be important to refer also to efficient (household) appliances, options of smart grid/flexibility of demand, transport efficiency, lighting, water pumping, as well as (household) water-heating (e.g. solar-thermal options), etc.</p> <p>It would be especially important to mention savings on F-gas-emission, especially by reducing the need for air conditioners and by using natural refrigerants. Also it should be referred to the role of urban management to ensure adequate waste streams for products with ODS/F-gases (A/Cs, fridges,...).</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Appliances etc under other sector Guides
Executive Summary	<p>Suggests to add the following words: 'and quarters', 'low-carbon building materials and ', 'existing and future buildings', 'as well as smart building and quarter design with natural cooling qualities'</p> <p>Suggests to delete: 'stocks'</p> <p>Also a sentence should be added to energy saving gains related to heating buildings in cold climates by shifting from coal, gas, wood to (green) electricity, heat pumps, district heating, etc.</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Additions made in Exec Sum and Section 4.1
Executive Summary	Summer: This is a wording that does not apply to the tropics and only partially to the subtropic regions. Please ensure that all regions and climates of the world have been considered in this sectoral guidance.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	We feel that the current wording is sufficiently general but will look to explicitly address differing climatic types in business models detailed in Annexes

Executive Summary	<p>Text added: Buildings could also be considered as Carbon-sinks whereas the increasing amounts of needed materials for insulations to enhance energy-efficiency should be replaced by renewable materials that later on can be recycled. To realize the option 'Carbon sink' the use of synthetic materials for insulation purposes should be incentivized and phased out as soon as possible. The link between building codes, housing policy and transport needs to be further elaborated: The urban form as well as specific building provisions have strong impact on transport emissions, e.g.:</p> <ul style="list-style-type: none"> -Maximum parking requirements --> Define the maximum number of parking lots per building (not minimum number) to discourage private car ownership and use and to encourage people to use public transport and active modes (walking and cycling) -Good access to public transport --> Define access criteria from buildings to public transport stops (maximum distance e.g. 400m) -Support (pre-)installation of electric charging infrastructure for vehicles (cars and bikes) in buildings -Transit-oriented development --> make sure to densify construction around public transport hub and axis -Ensure mixed use --> Mixed use areas (residential, offices, retail) ensure less and shorter distances 	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	<p>Agree. Section 4.1 amended</p> <p>Relevant to compact cities but too much detail for Exec Sum</p> <p>Text added to Section 4.1 but too much detail for overview Guide and will be addressed in Annexes</p>
Executive Summary	Should mention somewhere the importance of charging infrastructure to support wider EV deployment.	US Department of State	Is mentioned in Section 4.1
Executive Summary	Replaced forced mobility with unnecessary travel	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	ED suggested this term and I prefer it - it is a strong statement
Executive Summary	Added: (ASI approach)	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Avoid Shift Improve is relevant and now included in Section 4.1
Executive Summary	Added: Cities should pursue ambitious approaches such as zero emission areas (ZEAs) as championed by C40 and TUMI to kickstart transformational processes.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Section 4.1 modified.
Executive summary	shifting away from our current take-make-waste urban economies. In so called 'linear systems', cities consume over 75% of natural resources, produce over 50% of global waste, and are responsible, directly and indirectly for emitting between 60-80% of greenhouse gases.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Thank you. Incorporated in Section 3.1

Executive summary	Add: as well as technical	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Exec Sum and Section 4.2 modified
Executive summary	Financial support?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Elaborated in Section 4.2 and will be further addressed in Annexes
Executive summary	Replace 'structures' for 'capacities' (for project preparation)	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. Structures are broader than capacities. Structures = mandate+systems+capacities
Executive summary	This is related to: Lack of know how, qualified local companies and skilled workers to implement the innovations and needed changes – this would mean to clarify mechanism for capacity building	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Will be addressed under partnership strategies in Annex
Executive summary	The text could also refer to the Covid-19 crisis as a new barrier to achieving paradigm-shifting pathways in the urban sector (e.g. compact urban development and public transport perceived as less attractive due to epidemiological risks; increased littering due to massive use of personal protective equipment).	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	COVID will most likely strengthen most of these barriers. But as above, it is too early to be definitive.
Executive summary	From our point of view it would be important to emphasize the essential role the regulatory framework and policy/planning systems and increase in capacities have to systemically address the barriers mentioned above. There is no more sustainable investment than an adequate governance system and sufficient (human) capacities. Suggests to add text: increase capacities and improve the enabling policy frameworks, integrated policy and planning systems, and institutional as well as technical capacities as well as	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Text modified in Exec Sum and Sections 4.1 and 4.2 Partnership strategies to support GCF's capacity efforts will be set out in Annex
Executive summary	We regret that the paper does not further define we GCF's focus and added value in the financing landscape in this sector would/could be – beyond illustrative examples. There are already numerous initiatives and stakeholder active in this field. We expect that GCF does build up expertise and financing structures complementary to existing ones.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Agree. Discussed in Section 5.3 and will be elaborated in Annexes.

Executive summary	Transformational planning & programming: Strengthening the capacity of public institutions...	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Urban institutions are mostly public, but not all - some utilities and PPP structures are private
Executive summary	Delete: 'demand-side measures focused on s' and 'urban'	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No
Executive summary	Notion of "integrated urban, transport, energy and infrastructure planning" is important, but isn't captured in the four points above under paradigm shift pathways.	US Department of State	Relevant to "compact and resilient cities" - Exec Sum and Section 4.1 amended
Executive summary	Typo under last column -- NDBs or MDBs?	US Department of State	NDBs as written
Executive summary	Pillar 1: add Develop new street design standards norms to prioritize sustainable mobility modes	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Valid issue but too detailed for Exec Sum - captured under "develop and apply new technical standards"
Executive summary	The blue box missed the policy framework dimension that is key as a framework for the subsequent project pipeline development.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Ummm... first dot point is on policy and the last is on pipeline???
Executive Summary	Urban development literature distinguishes between "city" and "urbanized areas". Suggest revisions to replace "city" with "urbanized areas" throughout. This will distinguish between formal administrative areas and informal non-planned areas, which are of GCF interest. See UN definition: https://www.google.com/search?q=un+definition+city&rlz=1C1CHBF_enNL911NL911&oq=un+definition+city	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Good point and valid. But if we used "urbanised areas" everywhere it would be boring so added footnote to equate "cities" and "urbanised areas"

Executive Summary	Regarding comment "two thirds of the global population expected to reside in cities by the 2050 (UN, 2018)", this statistic has been revised in 2019. The UN refers to "urban areas" not "cities". https://www.un.org/development/desa/pd/themes/urbanization#:~:text=The%20world%20is%20becoming%20increasingly,around%20two%20thirds%20in%202050.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Correct. See above.
Executive Summary	Each of these four paradigm-shifting pathway areas needs a framework with subdivisions; they also need to be broadened to capture the full set of pathways in each segment and combined with supporting baseline information and selection criteria for country specific projects and programs	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree. But space in the overview guide does not allow it. They are partly broken down in Section 4.1 Table 3 but will be further detailed in Annexes
Executive Summary	Under the bullet "Decarbonization of urban energy systems"; the text here focuses on decarbonization of the electricity supply system, while leaving out opportunities for decarbonizing fuel supplies (e.g. fossil fuels used for heating, air conditioning, cooking, etc.). These include the use of biofuels, fuel cells and electrification of such systems. Repeat comment in Section 2.1.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Energy systems are broader than electricity but take the point. Clarified in Section 4.1 Table 3.
Executive Summary	Related to the previous comment; given the need for large-scale decarbonization of the transport sector, including vehicle electrification, this suggests that even more emphasis should be placed on distributed renewables. This linkage to the Transport sector is mentioned later on (page 7).	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	True. The issue is discussed in Section 4.1 but transport is elaborated in another Guide.
Executive Summary	Compact and resilient urban development - this needs a broader framework such as used by WB for Mexico.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Thank you for the reference - will incorporate in appropriate section of Annexes

Executive Summary	Lack of foundational data at the country level for baselines, strategies, potential MCA impacts to guide priority project proposals. These are beyond most proponents to provide and lacking at the country level under typical NDC analysis.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	This is true but AEs have access to consultants that can scale down climate models. Support to spread this capacity is needed both on the part of GCF and of partners - this issue is addressed in detail in the Annexes
Executive Summary	Regarding "There are a range of barrier across city types...", change "city types" to "urbanized areas".	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	City types here refers to differences across mega/ large and secondary but also across different country income levels. The current formulation is ok given we don't want to elaborate at this point.
Executive Summary	General observation that many urban administrative offices are conservative, and may be turned off by "paradigm shift" phraseology. Can be seen as external westerners (e.g., former colonists) trying to wield influence. Not all urban areas are progressive or interested in fundamental changes to their systems. "opportunities" is safer in many instances.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree. There is a good case to be made for a de-jargonised version of Guides in national languages.
Executive Summary	Overall comments: Direction is good, but needs support from an urban planning university with experience in resilience and developing country contexts. Suggest revisions as follows: 1) Revise data and stats to reflect urban and developing issues in GCF focused countries. Much data here is global or includes/blends developed country data, making it irrelevant to GCF concerns. 1a) References should be from peer review literature, and not consulting firms. 2) Make the concepts of modern resilient development urban planning front and center, rather than generic LED pathways. Urban resilience for developing countries is a robust sector, and this document focuses on western and global approaches. Resilient urban development is "increased through the inclusion of nature-based solutions and their associated delivery of ecosystem services in urban areas". See: https://www.sciencedirect.com/science/article/pii/S0264275119313976	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Thanks. More detailed EMDC context and data collection was not possible within budget and timeframe. Additional work on these lines could be done, budget permitting, in the preparation of the Annexes. Urban planning is important but only one aspect of the processes and systems that go to prepare a GCF project.
Executive Summary	What about "need driven"? Even if this is not the primary subject of the document, it seems essential to pinpoint that urban planning and transformations should not only respond to concerns about sustainability but also to the expressed needs of the populations who will have to be "beneficiaries".	Stephane Cienniewski, Alternate Board Member	Agree. It is unlikely that projects that do not meet local needs will be sustainable. The issue needs to be addressed in an FP and is discussed in Sections 7.3, 7.4 and 7.5
Executive Summary	Include mainstream disaster risk reduction (DRR) into all urban projects, for a slight additional cost (less than 5%), with a higher level of service (help in achieving Sendai's objectives, less disruption of urban services to users and businesses, less loss of business for entrepreneurs and therefore of GDP for the country).	Stephane Cienniewski, Alternate Board Member	Agree that the issue is important and Section 7.3 modified accordingly

Executive Summary	Integrate externalities and co-benefits into the calculation of the long-term profitability of projects in order to demonstrate and promote green and blue solutions compared to grey solutions. Particularly with regard to urban or peri-urban disaster response works (urban flooding, coastal resilience, etc.).	Stephane Cienniewski, Alternate Board Member	This is required in the Economic CBA calculations required in an FP and is referred to in Section 7.6
Executive Summary	Including studies by GCA, GFDRR, GABC and CDRI.	Stephane Cienniewski, Alternate Board Member	Will be covered in partnership strategy in Annex
Executive Summary	As stated earlier, governments often do not have the finance needed to fund infrastructure projects through public budgets; PPP models can bring in necessary financing, technology, expertise and efficiencies. It would be great to see some incentives in this Guide for FP developers to bring in private actors. The use of guarantees encourage private participation so this would be a relevant financial instrument to include here	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	The issue is referred to in Section 5.3 and covered by examples in Section 6 but will also be further detailed in Annexes.
Executive Summary	Suggest adding: "increase capacities and improve the enabling policy frameworks, integrated policy and planning systems, and institutional as well as technical capacities as well as" Through its country-driven approach, the GCF helps countries increase capacities and improve the enabling policy frameworks, integrated policy and planning systems, and institutional as well as technical capacities as well as design, finance and implement innovative climate initiatives that can be replicated, scaled up and sustained after project completion to achieve transformational change.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	The GCF has few resources of its own to do this, but the issue is important. Text in section 1.6 modified.
Introduction	Definitely keep all of the academic background and rationale along with sources as it supports the importance of finding climate smart urban solutions	Executive Director, Climate Markets & Investment Association	Noted. Thanks.
Introduction	pg 6 Table 1 is useful to remind readers what the 8 GCF mitigation and adaptation results areas are so that complementary approaches are considered for proposals.	Executive Director, Climate Markets & Investment Association	Thank you
Introduction	Pg 7 Table 2 very useful to highlight relationship	Executive Director, Climate Markets & Investment Association	Thank you
Introduction	SDG 5 should absolutely be listed as an SDG with particular relevance. See overarching comments regarding gender.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Beg to differ. SDG 5 is relevant but not as important to this Guide as the SDGs cited.

Introduction	"In other words, conventional urbanization with its implications for levels of transport-related emissions and energy demand must shift across all regions towards pathways that promote sustainable cities, buildings and urban systems." This statement does not include urbanisation that destroys natural habitats such as coastal zone destruction of coral reefs, mangroves, wetlands, and reclamation of fishing areas or construction on hill slopes. It assumes that all urbanisation happens on flat, greenfield/brownfield land. areas.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	If urbanisation destroys natural habitats then it is not sustainable as defined in this Guide - the investments framework - Section 7 - will exclude it.
Introduction	While Table 1 presents GCF's mitigation and adaptation results areas, there was a lot less attention that went into deliberating the adaptation measures compared to the former. This imbalanced treatment is consistent throughout the entire guide. See overarching comments.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Have strengthened reference to adaptation in ES and Sections 4 and 5.
Introduction	Table 2 presents the relationship between topics covered by this Urban sectoral guide vis a vis GCF's other sectoral guides – which essentially makes this urban sectoral guide seem incomplete and stripped down.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Noted
Introduction	The water sector guide overlap leaves out the importance of urban landscapes in affecting water flows, through large expanses of impermeable surfaces, for example; considerations of how poorly managed stormwater runoff can affect water/wastewater management (by overloading water/wastewater treatment systems); and how the siting and high consumption of urban landscapes can impact water access for users downstream.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Editorial issue for Water Guide
Introduction	We suggest incorporating robust impact assessments of GCF funding requirements on the vulnerable groups and individuals as well as measures to mitigate negative impacts (i.e. affordability analyses). Affordability analyses will inform the main challenges for vulnerable people to adjust to green solutions and how they could benefit from those instead of them being a burden for them.	CEE Bankwatch Network	Safeguards issues strengthened in Section 7.
Introduction	Around 1 billion of the urban poor living in poor-quality, overcrowded housing in "slums" or informal settlements are most at risk from sea-level rise and from the heatwaves, storms and floods whose frequency and/or intensity climate change. The introduction section should bring this focus as well as set the scene and tone for GCF city investments directed towards the urban poor and vulnerable.	UNEP	Informal settlements now referred to in Sections 2, 4, 5 and 7

Introduction	How are SDGs relevant to GCF mandates?	US Department of State	The SDGs are both directly and indirectly (depending on the SDG) to GCF's mission as set out in Section 2.1 and referred to in Section 7.3
Introduction	Since this document and the IPCC6 chapter on Cities and Infrastructure have overlapping priorities related to climate change, I think there should be a crosswalk of data and references between the two.	USAID	Agree. IPCC referenced and key findings incorporated.
Introduction	I perceived the on-the-ground audience to be of at least a somewhat developed nature up to the developed world (Global North). While there was some acknowledgement of Global South typologies, I could not envision how the majority of these ideas would translate in places where we advocate for comprehensive integrated urban systems, and local government contacts state that they are prioritizing one facet of the urban system. I want to be clear in stating that the solutions need to be comprehensive in nature, but I have seen in-country too many instances where the demand does not match that vision. That said, we should keep trying.	USAID	Valid point. The audience of the Guide are the project sponsors and the AEs of which the latter are more sophisticated and to which level the Guide needs to cater. Critical will be the capacity of the GCF to partner with development agencies and national AEs to craft effective implementation mechanisms that engage local stakeholders.
Introduction	Although mentioned in the document, SDG n°11 is insufficiently taken into account, in the sense that the creative urbanisation of housing and even informal settlements seems to be hidden. Resilient and sustainable urban planning must have among its objectives to put an end to it or at least to improve the conditions of access to essential services mentioned in other contexts in the document.	Stephane Cienniewski, Alternate Board Member	The issue of informality is important. This has been clarified in relation to barriers in Section 4.4 and business models in Section 5.3. It will also be addressed in the Annexes.
Introduction	Suggest changing "two thirds of the global population expected to reside in cities by the 2050 (UN, 2018)" to "...the majority of global population is expected to reside in urbanized areas by 2030" (citation: UN Population Division - Urbanization https://www.un.org/development/desa/pd/themes/urbanization#:~:text=The%20world%20is%20becoming%20increasingly,around%20two%20thirds%20in%202050)	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	The majority of global population already resides in urban areas. See Climate Change and Cities: Second Assessment Report of the Urban Climate Change Research Network. 2015.
Introduction	Regarding "Climate investments in urban areas also have significant co-benefits," provide citations as data is weak on co-benefits. See lit review on this topic: https://www.sciencedirect.com/science/article/abs/pii/S0048969720351718	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Cobenefits are discussed in Section 7.3

Introduction	Note that positive co-benefits are not a given and require a high level of expertise and effort to design and implement	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Depends on the cobenefit but point taken. Section 7.3 modified.
Introduction	Suggest modifying the phrase "...towards pathways that promote sustainable cities, buildings and urban systems" to include "resiliency, nature based solutions, and sustainable land use and infrastructure."	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Do not elaborate on urban systems in the introduction. These are discussed in various dimensions in following sections.
Introduction	Link to the Programming Manual is broken. Also broken in the Exec Summary.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Editing issue.
Introduction	Table 2. Suggest an addition to the row addressing Forest and Land Use to guide the reader as to where urban forest/green spaces are addressed in the sectoral guides (city greening is mentioned under Health).	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Table 2 amended.
Introduction	This is exactly the same text as in the Executive summary. Consider re-writing/paraphrasing one or the other. Please see detailed comments made to the same passage in the Executive Summary.	GCF Secretariat	Have summarised in the Exec Sum
Introduction	Suggest deleting	GCF Secretariat	No
Introduction	Same as Executive summary.	GCF Secretariat	Trimmed the Exec Summary
Introduction	Should a similar section also be in the Agriculture guide?	GCF Secretariat	Editing issue.
Introduction	Consider moving to a footnote "For more details, refer to Section 3"	GCF Secretariat	Editing issue. But not in favour of putting such information in footnotes.
Introduction	Complicating factors in the development of such tools; big variations in cities in terms of size, maturity, economic development, infrastructure and governance models, and in the influence that local governments have over the emissions drivers. Need to recognize the diversity of cities. No single approach.		Need for diversity of approach clarified in Section 4.1

Introduction	There is no conclusion to the footnote about what the GCF would accept as a mega-city or secondary city, which would help the developer of the FP to understand.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	GCF will not take a position on a potential project based on whether it is a mega city or not, but on how the project responds to its context in order to maximise impact (cf Investment Framework)
Introduction	Text added: The building and construction sector is particular relevant for decarbonizing urban areas as it accounts for 35% of final energy use and 38% of energy and process-related carbon dioxide (CO ₂) emissions, globally (GlobalABC, 2020). According to the Global Status Report for Buildings and Construction 2020, CO ₂ emissions from the sector reached a record high in 2019, while at the same time annual decarbonization progress was slowing down. This trend is also reflected in investment figures: for every \$1 spent on energy efficiency, \$37 is spent on conventional construction approaches. Thus, much more effort is needed to shift investments towards decarbonizing buildings. And this shift is urgent: To be on track to achieving a net-zero carbon building stock by 2050, the IEA estimates that direct building CO ₂ emissions would need to decrease by 50% and indirect building sector emissions decline through a reduction of 60% in power generation emissions by 2030.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Very relevant thank you. Text added.
Introduction	As this guide is supposed to cover cities, buildings and urban systems, we strongly encourage you to include some facts and figures on the building and construction sector as well. This paragraph is exemplary. Key facts may also be integrated elsewhere in the introduction. For further information and data, you may want to check: https://globalabc.org/resources/publications	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree, See above.
Introduction	Most vulnerable. refers to?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Generally the informal sector. Clarified and added in Sections 4.2 and 5.3.
Introduction	Formulation. Half of what area? Already planned and designed to become a city, or expansion of existing cities, etc.?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Expansion of existing cities generally. Clarified.
Introduction	Negative externalities are market failures but urban sprawl and congestion are what cause the market failures, they are not market failures themselves	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. Market failures may result from not pricing negative externalities BUT they may be also the result of lack of competition, information asymmetries yada yada. So negative externalities and market failures are different concepts and examples are given of both

Introduction	Formulation. USD trillion in 2018 USD – is it taking into account NPV here or inflation, or is it worded wrongly?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Adjusted for inflation. Wording ok.
Introduction	Suggest adding: " However, governments– and especially local governments – are often " Comment: As stated later in this guide, page 11 for example.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended
Introduction	This guide should then provide incentives for moving away from BaU	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	GCF concessional financing IS the incentive
Introduction	See above... This sentence should include the support for policy frameworks and capacities and other systemic improvements in addition to the design, finance and implementation of more or less project-based "initiatives".	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Section 2.1 amended
Introduction	Zero and low-emission transport	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Table amended
Introduction	As pointed out in a previous comment, this urban sector strategy is generally very comprehensive and well-structured! Yet, important urban sectors and their interlinkages (especially transport) could be better addressed: oWe understand that urban sectors are also addressed (in more detail?) in other sectoral guides. Nevertheless, it would be good if the urban sector guide is fully comprehensive sector/topic wise as well, addressing adequately the (complex) interlinkages. oE.g. the interaction between decentralized RE generation and centralized on-grid energy systems as well as between energy efficiency and the transition to a low-carbon urban economy are not so clearly pointed out.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	The interlinkages will be addressed in more detail in the Annexes

Introduction	<p>The terminology “distributed energy” does not say anything about whether it is on- or off-grid. It rather refers to the size and relative location of the energy production. So, the distinction you are drawing here isn’t very clear. So for example, why rooftop solar PV power may be primarily used by the owner to lower his/her own electricity bill, it can also be fed into a the grid and sold to the utility and/or it could be used supply neighbors, etc.</p> <p>I suggest to allow for a little overlap between the sectoral guides.</p> <p>In the table 2, the reference on energy should be corrected to “zero-carbon energy for cities by grid-based renewable energy”</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	The distinction drawn by focusing on distributed energy is to define energy that is produced by a facility that is, in turn, more under the control of city administrations or agencies, not of major grid-linked generating entities. They may be individual instalations or micro-grids and may or may not be connected to the grid
Introduction	This paragraph should be almost identical to the equivalent paragraph in the Agriculture guide.	GCF Secretariat	Editing issue.
1	EBRD welcomes the fact that the guide pays equal attention to both mitigation and climate resilience aspects in its introductory chapters, recognising that these are interlinked and cross-cutting issues. More attention could be given to achieving this balance of climate resilience and low carbon development in the PSPs. Specifically PSP2: improving the energy efficiency of building stock should also include reference to climate resilience and the benefits of more liveable buildings. Suggest to reword PSP2 to "Improving Energy Efficiency and Climate Resilience of Building Stocks"	Climate Finance Associate, E2C2 at EBRD	Point taken, but we have included resilience at the building level in PSP3 on Compact and Resilient Cities
1. Global Context	<p>General comment: References are missing for some of the statistics/data mentioned.</p> <p>References should be specific – ideally with a hyperlink or url.</p>	GCF Secretariat	References added
1. Global Context	From my understanding, a guide should give a step by step way of doing something or getting to a desired end. The steps should be clear and progressive such that the reader can evaluate themselves. From reading this guide, it is information from research of what is being done or what finance is available in the urban sector.	GCF Secretariat	The actual "step-by-step" guidance is in Section 7. The proceeding sections provide the approach and background information required to apply the approach and to complete an FP
1. Global Context	We expect GCF to make accurate analysis on expected future growth of GHG emissions and double check expressions as "the expected future growth in... GHG emissions wth will be predominantly in emerging and developing countries, led by urban areas in China, India, south east Asia and sub-Saharan Africa" (Page 6, para. 2). If there is no solid evidence on such conclusion, we hope GCF would delete this sentence.	China Board Member	Reference added
1. Global Context	Suggest this section be restructured to use primary sources and peer reviewed literature to reflect "the scientific basis". Also suggest this section adhere and reflect the four paradigm shifts outlined in the introduction.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	This section sets out the context for PSPs set out in the following section. Foe lterature review see below

1. Global Context	Suggest this section focus on Developing Country Context, relevant to GCF country portfolio. Info here doesn't seem particularly useful for GCF recipient partners.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Developing country data for cities - particularly comparative data - is sparse, nevertheless most references in this section relate to developing countries.
1. Global Context	Co-benefits are missing from this section. Suggest either adding from peer review literature, or just cutting from previous sections.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	This section was designed to on the climate context. Cobenefits are referred to earlier but addressed in more detail in Section 7.3
1. Global Context	Regarding "Most advanced economies and some emerging countries in Latin America are already highly urbanized, hence their contributions to urban growth are expected to be relatively modest", a citation is needed. New stats show population growth is projected to be 18% and there is aging population in LAC, meaning specialized tools, incentives, and planning techniques for resilience are needed	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	References added As regards to tailored approaches for LAC - or Africa or SIDs - the Guide cannot address all regions separately given the available space. However, it does emphasise, and provide methodologies to ensure, that proposed projects respond to local circumstances - that said there is a case for localisation of Guidance as discussed above
1. Global Context	In the paragraph beginning with "The only detailed urban-focused study on establishing actual goals for urban emissions reduction extant is the C40 and Arup (2016) study..." Suggest to delete and replace with relevant info from GCF countries and peer review literature.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	No. The point being made is important
1. Global Context	Regarding the statement "In fact, 85 percent of the 620 cities reporting on the CDP disclosure platform in 2018 reported already having experienced major climate impacts (CDP, 2019).", suggest using peer review literature.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	There isn't any we are aware of

1. Global Context	Regarding "One study estimates that average flood losses for the 136 largest coastal cities may increase from US\$6 billion in 2005 to \$52 billion by 2050", the majority of these 136 are not in developing countries of interest to GCF. Suggest using data for a) secondary cities/urbanized areas, not primary cities, and b) reflect the issue within GCF's flood risks and located inland.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	No other data is available and the point is important
1.1	Definitely keep all of the academic background and rationale along with sources as it supports the importance of finding climate smart urban solutions	Executive Director, Climate Markets & Investment Association	Agree. Thank you.
1.1	"Most advanced economies and some emerging countries in Latin America are already highly urbanized, hence their contributions to urban growth are expected to be relatively modest." This should not prejudice the need for highly urbanised cities such as those in Latin America to access international climate funds, especially to adapt to climate change impacts and increase their resilience. This is also an unhelpful narrowing, as a GCF sector guidance should not just deal with growing cities, but also with the real climate change challenges and impact existing cities in developing countries irrespective of urban growth potential are already facing.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	The discussion of the difference between cities in LA and other regions is not meant to suggest narrowing of eligibility, indeed, given their size and income level they have high priority for mitigation and often, given the number of vulnerable people, for adaptation investment.
1. Global Context	This is as of when? (instead of using the term "now", should specify the year)	GCF Secretariat	Amended
1. Global Context	This is as of when? (instead of using the term "now", should specify the year)	GCF Secretariat	Amended
1. Global Context	Should be 'Developing'	GCF Secretariat	Amended
1. Global Context	Energy related	Advisor to Board Member (BM) Heike Henn, Germany-The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Yes, but also Scope 3 emissions from agriculture for food and other products consumed in cities
1. Global Context	Stockholm Environment Institute 2015 and successors also provide useful numbers and insights, suggest to include SEI (2015) "What cities do best: Piecing together an efficient global climate governance" https://www.sei-international.org/mediamanager/documents/Publications/Climate/SEI-WP-2015-15-Cities-vertical-climate-governance.pdf □lead in transport □implement in buildings partner in incentives & education	Advisor to Board Member (BM) Heike Henn, Germany-The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Noted. Detail on business models and governance arrangements will be included in Annex.

1. Global Context	Health systems and local infrastructure. -Delete the word 'existing'	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
1. Global Context	add the word "existing: final text could be: While there is room for increased ambition in the urban sector, countries' existing NDCs offer clear signals as to their demand for climate support in urban areas	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
1.2	Country ownership and link to NDCs in Figure 1 is compelling. Shows the need for creating NDC financing plans	Executive Director, Climate Markets & Investment Association	NDC reference is strengthened in Section 7.
1.2	"In NDCs with 'strong' urban content, on average, a third (33%) of estimated costs for implementing those climate plans were associated with urban priorities. In NDCs with 'moderate' urban content the urban priorities represented only 10 percent of costs." The "strength" of urban content in NDCs is evaluated in this guide based on the percentage of estimated costs for implementing climate plans with the urban priorities. The purpose behind such a method is not immediately clear. A strong urban content should be defined based on various considerations – among which is the scale of impact based on the number of people in the population that will benefit from it and any corresponding emissions reductions. Low cost climate plans do not necessarily mean that it has lesser 'strength'. E.g., urban farming programmes may not cost much to implement but it does contribute to shortening the food supply chain which has a strong impact on the local food security and livelihood.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Noted. But we do not have the data.
1. Global Context	There are several estimates of urban content in NDCs, reaching different conclusions – see for example "Recover green: Higher NDC-Ambition through Collaborative Climate Action" (GIZ 2020) – where it also becomes clear that developing country NDCs describe cities and other non-state actors primarily in the context of vulnerability and adaptation policy implementation; developed countries, by contrast, mainly describe these actors' role as collaboration across a range of functions.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Noted
1. Global Context	How is it defined in this context? (in reference to "efficiently"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Text clarified

1.3	<p>"Potential emissions reductions can have large economic returns in the medium to long term – with 58% of these emission savings come from the buildings sector, ..." Does this take into consideration the existing global problem of property overhang, oversupplies that are driven by the speculative property market? Especially in the consideration that this document also stated that most of the emissions will come from cities that have yet been built. Refer to Para 3, Pg. 1 ("Globally, of all the infrastructure expected to be in place by 2050, nearly 75% will be in cities yet to be built" (Coalition for the Urban Transitions, 2019). A serious discussion about climate mitigation should not skirt around the underlying problem that the world is probably building more than it is necessary.</p>	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	This issue is addressed under processes described in Driver 1 appropriate Planning and Programming and under PSP3 on Compact Cities. The wider issue of whether we need to build more in specific cities is beyond the scope of this document.
1.3	<p>"Countries that have high vulnerability-low readiness could be expected to have the highest levels of demand for urban adaptation and resilience projects. Countries with high vulnerability and high readiness can also be expected to have relatively higher levels of demand – and may have a higher yield in terms of benefits per input." The statements here seem to prejudge the eligibility of countries with "high vulnerability-low readiness" to receive the funding for the adaptation measures that they need; as it implies that investments in urban adaptation and resilience projects in such countries may bring lower yield in terms of benefits per input. There does not seem to be any additional deliberation to address this matter that would be helpful in addressing this issue. This issue is also complicated by the country-lens being used, when the specific urban system and its policymaking and decision-making structures, including local community engagement and the activism of civil society, may have a greater influence on readiness.</p>	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Agree. But we lack data.
1.3	<p>What is the evidence used for what interventions are most cost-effective? Two relevant documents which may help are: https://www.cameronhepburn.com/research/publications/will-covid-19-fiscal-recovery-packages-accelerate-or-retard-progress-on-climate-change/ and https://www.lse.ac.uk/granthaminstitute/publication/strategy-investment-and-policy-for-a-strong-and-sustainable-recovery-an-action-plan/ - see annex</p>	Advisor to BM Josceline Wheatley	Noted with thanks will include in relevant sectoral sections of the Annexes.
1. Global Context	<p>Regarding "Generally, high rates of urbanization combined with high vulnerability/exposure and low readiness imply countries lack the financial and planning capacity to adapt to climate change", suggest ground truthing this assumption by reviewing the literature on adaptive capacity in urban areas/secondary cities in developing countries.</p>	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Study cited. That's the best we have and the point is important
1. Global Context	Suggest revision to "Countries that have high vulnerability and low readiness"	GCF Secretariat	This is the terminology used in the study and we will keep it.
1. Global Context	<p>Suggest revision to "Comparing the [...], almost all are ..."</p> <p>Should "ND-GAIN" (in the footnote) be added to the abbreviations?</p>	GCF Secretariat	No No
1.4	pg 11 - good that you link to Section 4 which discusses financial models required to leverage	Executive Director, Climate Markets & Investment Association	Thank you.

1.4	"1.4 Financial requirements " check also: https://www.citiesclimatefinance.org/2017/11/ccfla-mapping-report-ccfla-is-releasing-the-second-edition-of-its-flagship-report-localizing-climate-finance-mapping-gaps-and-opportunities/	Head of Innovative Finance, ICLEI	Noted. The general issues addressed are compatible with the approach taken in the Guide.
1.4	While the estimates provided are coming from different sources, we believe that assessing financial needs for specific results areas here is not required. Needs are currently assessed in other contexts, e.g. a first overview of methodologies and approaches will be only discussed at the next COP26, with the objective of assessing potential financial needs rather than determining them. We are not therefore sure whether having an estimated quantification of financial requirement within the sectoral guidance for results areas to assess investment priorities for the GCF-1 is currently included within the mandate.	Board Member	Noted.
1.4	Same here, it is too early to define them as "conclusions". These are only estimates, and other methodologies, approaches and calculations could provide different assessments which are currently under evaluation in other contexts (e.g. the Standing Committee on Finance).	Board Member	Noted.
1. Global Context	Under financial requirements, note that financing can be a replacement as well as an addition and it helps to know how much funding is a redirection of existing or BAU financing vs incremental new sources.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	And the GCF could estimate this how? All we can do is ensure that the assessment for each project ensures that it is additional. The methodology for this is set out in Section 7.
1. Global Context	For "The associated annual incremental up-front cost of future infrastructure investments consistent with the below 2 degrees Celsius' scenario was estimated to around 10%," citation is needed.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Reference added
1. Global Context	Regarding "Rydge et al. (2015) estimate about US\$90 trillion..." This global stat is from 2013 and has been revised. Suggest using a statistic that focuses on developing countries relevant to GCF's portfolio.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Reference amended CHECK

1. Global Context	Regarding "Shifting to low-emission infrastructure could add as little as 5% to upfront investment costs in 2015-2030", citation is needed. Clarify if GCF is suggesting to developing country partners to set aside 5% of revenues. Might be useful to clarify how this information can be used by developing country partners.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Good point . Clarified
1. Global Context	Not sure what this sentence means.	GCF Secretariat	Think it is fairly obvious
1. Global Context	Suggest revision to "such as the one set out.."	GCF Secretariat	There are more than one business models set out in Section 5
1. Global Context	Formulation, or reference. Actually there are many ways to calculate costs and estimating the increment is one way	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
1. Global Context	To achieve this, infrastructure investment needs to be both scaled up, and, due to climate risk, climate objectives need to be integrated.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Clarified
2. The PSP in the Urban Sector	The four paradigms cover most of the topics relevant to CC in urban areas. However, while resilience is mentioned in title of Paradigm 3, fostering risk informed urban planning to increase resilience does not seem to be really part of the intervention areas / impact potentials. It rather appears that climate resilience is mainly focused on the fostering of Non-Motorised Transport (NMT), E-mobility, Transit Oriented Development (TOD) and Land Value Capture (LVC) approaches. The linkage to urban planning makes most sense here, since of all sectors mentioned, the efficiency of mobility can profit most from a compact and efficient land use planning. Urban planning should therefore be strengthened in GCF present paper.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Resilience was a separate PSP in the initial formulation of the Guide. The decision was made to merge it with compact cities because the institutions and mechanisms required to plan and implement resilience projects are the same as/ very similar to compact cities projects.
2. The PSP in the Urban Sector	Structure of this paper is somewhat repetitive -- this section seems similar to the summary in length and content.	US Department of State	True. Have edited the Exec Sum to reduce overlap
2. The PSP in the Urban Sector	Suggest checking if there is current data on this information.	GCF Secretariat	Point taken but there is no more up-to-date data.
2. The PSP in the Urban Sector	Suggest checking current data. Please check if this is relevant https://www.ipcc.ch/site/assets/uploads/2018/03/WGIIAR5_SPM_TS_Volume-3.pdf	GCF Secretariat	Reference updated

2. The PSP in the Urban Sector	<p>When identifying the paradigm-shifting pathways: the first one deals with energy provision, the second one with housing, the last one with waste management, and the third one is an unclear mix of transport and urban planning. Audience is different, the approach is different, and a better definition and identification of how urban development can contribute to adaptation and mitigation is missed throughout all the document.</p> <p>The document mentions "provisions for compact urban growth" but then the idea disappears in the paragraph afterwards and it is not explaining anywhere "how provisions for compact urban growth" are expected to be promoted.</p> <p>In my opinion references to "nature-based solutions" are missed, as well as references to identification and addressing of urban risks related to floods, sea-level rise, developments linked to fresh water resources and urban mobility plans, and the promotion of urban regeneration projects as a way to promote densification vs new developments</p>	Head of sector Transport and Urban Development, UfM	NBS are now included in various sections (see above) and the difference among stakeholders across PSPs is more of a feature than a bug. Business models set out in Section 5.3 address incentives for these diverse stakeholders
2. The PSP in the Urban Sector	<p>Given the recent GCF B.27 Board approval of the updated Strategic Plan focusing on adaptation, LDCs and SIDs, and use of direct access entities, a strategy for how these objectives will be met in the urban sector would be useful, thus further detailing the Guidance Note.</p> <p>On that regard, the issue of adaptation could be given a more prominent role in the guidance note. E.g. issues of health, economic resilience (building back better from COVID19), business models of adaptation investment and for ecosystem services, could be stronger elaborated – perhaps in a separate “Transformative Action Field” (recognising that there are some institutional overlaps between adaptation and the promotion of compact cities).</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	As above, resilience was a separate PSP in the initial formulation of the Guide. The decision was made to merge it with compact cities because the institutions and mechanisms required to plan and implement resilience projects are the same as/ very similar to compact cities projects.
2. The PSP in the Urban Sector	Development of megacities/metropolises or cities in the developing world?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Yes. Mega// large and secondary
2. The PSP in the Urban Sector	<p>The section waste and from the webinar on cities brought up the topic of waste sector and the challenges that arise with the waste and climate mitigation and adaptation sector. Perhaps to develop this section further, it might be useful to reference the waste and IPCC publications. In working with the waste sector, the country submissions to the UNFCCC are useful documents to identify GHG emission reduction in this sector. The GCF is correct in that the emissions interventions come in after the waste has been collected, without the collection it is difficult to respond to these needs. And most of the emissions are from anaerobic digestion of organic waste. The difficulty also lies in funding this basic urban service as it is a mandate that sits with the city governments, but climate financing happens at the national level. To tackle emissions from waste, the services need to be addressed and then the emissions from it.</p>	Senior Green Cities Officer, GGGI	Agree. Noted
2. The PSP in the Urban Sector	paragraph Deleted	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. Point important
2. The PSP in the Urban Sector	<p>Energy efficiency should not only be considered in buildings as isolated entities but in the design of whole districts to foster efficient integrated solutions (e.g. district heating/cooling systems; district land-use and development plans, including nature-based solutions)</p>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Good point. Clarified

2. The PSP in the Urban Sector	It could be useful to list the appliances, such as AC and refrigeration appliances (it is specified page 18)	Stephane Cienniewski, Alternate Board Member	As above, this will be in the EE Guide
2. The PSP in the Urban Sector	But depending on where they are this would be a private investment	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	True. Noted But this does not mean that a public facility or publicly catalysed facility cannot support private investments
2. The PSP in the Urban Sector	The document seems to mainly focus on transport of people. Transport of goods exists in cities (urban freight), but there are options to reduce its impact: installation of zero- or low-emission urban zones, non-motorised or zero emission last mile delivery options, zero emission vehicles, improvement of inter-modality...	Stephane Cienniewski, Alternate Board Member	Agree the issue of freight transport in important and now referred to in Sections 4.1 and 5.3. More detail will be provided in the Annexes
2. The PSP in the Urban Sector	This paragraph would benefit from mentioning the importance of [urban] planning to achieve a "Compact and resilient urban development".	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended
2. The PSP in the Urban Sector	added text: unnecessary travel; as in the ASI approach.Deleted text: 'forced mobility' and 's'	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Reference to ASI approach added
2. The PSP in the Urban Sector	In Table 2, these areas would benefit from a more comprehensive framework of sub actions beneath each action area; currently they do not cover all of the GHG reduction action sub areas. Also, it would help to separate mitigation and adaptation.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree but detail of "sub-actions" can only be included in the Annexes - the table is already long
2. The PSP in the Urban Sector	Either here or in the building section, in addition to RE deployment and EVs, I would include reducing emissions from heating/cooling, which covers building and appliance efficiency (esp. ACs in SE Asia), but also fuel source and generation type -- literature points to electrification of heating/cooling as a likely way to reduce emissions, along with a few other solutions like combined heat and power (CHP) plants and district heating.	US Department of State	Text amended
2. The PSP in the Urban Sector	Should include appliances as part of buildings here, e.g., lighting, A/Cs.	US Department of State	As above appliances are in EE Guide
2. The PSP in the Urban Sector	This table shows a link with the Agriculture Guide – but the equivalent table in the Agriculture Guide does not mention Cities.	GCF Secretariat	Addressed above
2. The PSP in the Urban Sector	It is hard to read due to the small font, consider making the table bigger.	GCF Secretariat	Yeah. Table is already big

2. The PSP in the Urban Sector	Suggest “Urban Energy Systems”, to be consistent with page 12	GCF Secretariat	Text amended
2. The PSP in the Urban Sector	Should this be “middle-income”?	GCF Secretariat	Text amended
2. The PSP in the Urban Sector	Does this bullet belong in this table? Should it be in section 1?	GCF Secretariat	The issue is raised in section 1 but the point is repeated as it leads into an example
2. The PSP in the Urban Sector	These three sentences appear to raise separate, unconnected issues. And the first seems to belong in Section 1, rather than here.	GCF Secretariat	True. These are examples of different health issues. Health is addressed in Section 2 (as numbering now stands).
2. The PSP in the Urban Sector	Suggest “2030 targets” or “2030 emissions targets” Should delete incurred	GCF Secretariat	Text amended
2. The PSP in the Urban Sector	Should be “Circular Urban Economy”, to be consistent with page 12	GCF Secretariat	Text amended
2. The PSP in the Urban Sector	Are we referring to imperial tons (“tons”) or metric tonnes (“tonnes”)? The Agriculture guide refers to tons; this guide refers to both.	GCF Secretariat	Typo. Only metric tonnes used in this Guide.
2. The PSP in the Urban Sector	Should include need to support charging infrastructure for EVs somewhere in this section.	US Department of State	Text amended
2. The PSP in the Urban Sector	GCF should assess including “Urban agriculture” in this Sectoral Guide. After energy consumption, food consumption is the biggest source of carbon emissions. Urban growing can include: rooftop and vertical gardens, urban farms, growing food intensively indoors, etc.		This an important point. Cities' scope 3 emissions are generally not sufficiently addressed. The issue is included under the Circular Economy PSP
2. The PSP in the Urban Sector	Shift to zero emission urban freight could also be mentioned. Some cities are introducing zero- or low-emission zones in city centres and non-motorized “last mile delivery” systems	Stephane Cienniewski, Alternate Board Member	Text amended
2. The PSP in the Urban Sector	Extensive provision of electric vehicle charging points should also be included in urban planning.		Text amended
2. The PSP in the Urban Sector	Management and disposal of electronic and industrial waste (heavy metals and solvents) could be included within this category. It is important to keep hazardous substances out of the loop.		True. But this is a cobenefit
2. The PSP in the Urban Sector	Recommend citation for this as it will heavily depend on the place. Utility-scale RE provides cheaper and cheaper electricity, which is even more important in cities with very low income residents.	USAID	True. Clarified
2. The PSP in the Urban Sector	Quite some duplication of text in this table	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	True. Repeated in Exec Sum

2. The PSP in the Urban Sector	Suggested text: Developing world cities can capitalize on the opportunity to contribute to achieve reductions through distributed renewables in their jurisdiction, in addition to centralized decarbonized energy systems.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Text added
2. The PSP in the Urban Sector	See comment above.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Ok. See above
2. The PSP in the Urban Sector	Focus maybe too strong on buildings? What about public lighting, efficient district heating/cooling systems?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Very good point. Text added to clarify
2. The PSP in the Urban Sector	Also, it is unclear what the source of the numbers are in the footnote. It seems to underestimate the role especially the cooling sector will play on energy-demand (and if mismanaged ODS-emissions) in especially developing countries in the decades to come.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Text amended
2. The PSP in the Urban Sector	New text proposed: The introduction of maximum parking requirements, good access to public transport, (pre-)installation of electric charging infrastructure for vehicles (cars and bikes) in buildings, transit-oriented development and good mixed use can reduce transport-related emissions of buildings by up to 80% depending on specific circumstances.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Ok. Reference?

2. The PSP in the Urban Sector	<p>Linkages between the four PSPs are to a large extent absent in the document. This is problematic, as there are synergies between these various sub-sectors. Especially PSP 2 should be better linked to PSP 1, 3 and 4. PSP 2 should also take into account new buildings and not only the building stock. A few examples of (missing synergies):</p> <p>Linkages between the four PSPs are to a large extent absent in the document. This is problematic, as there are synergies between these various sub-sectors. Especially PSP 2 should be better linked to PSP 1, 3 and 4. PSP 2 should also take into account new buildings and not only the building stock. A few examples of (missing synergies):</p> <p>a.Linkages between urban planning (compact cities – PSP 3) and building/housing sectors (compact, low energy buildings PSP 2) need to be proactively supported. This is especially important at the enabling environment level, where regulations pertaining to the urban level and the building level can be contradictory.</p> <p>b.Linkages between PSP 2 and PSP 4.2 (Circular Economy, Material and Material Flows). A large majority of material consumed and waste produced globally, and especially so at the city level, are construction materials. There also, better linkages between PSP 2, 3 and 4.2 would be useful.</p> <p>c.At the institutional level, compartmentalization among city departments, among line ministries, and between these two levels are often slowing down progress, as noted by the document. This is especially the case on multi-sectoral topics such as building regulations or circular economy. Therefore, it would be important that the document presents how the program is planning to address these interlinkages.</p>	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Agree there are significant synergies among PSPs. The issue is that the delivery systems for PSPs are generally different - which is why they are treated separately. Coordination of planning and integrated investment requires capacity development of demand-side institutions and the development of incentive systems for financial institutions that foster such investment. The issue is referred to in Section 4.1.but will be further developed in the Annexes.
2. The PSP in the Urban Sector	Technical solutions presented under PSP 1 (decarbonization of the energy sector) and PSP 2 (improving energy efficiency of building stocks) remain very generic. PSP 3 and 4 are more detailed, and the same level of detail would be needed under PSP 1 and 2 to issue a final opinion.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Agree. More detail in Annexes.
2. The PSP in the Urban Sector	Emphasis on reducing “forced mobility” is very much welcome. Several publicly financed initiatives focus on “cleaner” mobility while analysis (even by IPCC) shows that technology alone will not suffice to reach climate goals as per Paris Agreement. A change in mobility patterns is required.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Thank you
2. The PSP in the Urban Sector	Differentiation and trade-offs. The differentiation between impacts to be expected in middle-income and low-income settings is interesting. But it would be useful to at least mention existing trade-offs between densification of the built environment and urban eco-systems (which increase resilience – e.g. by reducing heat islands and by fostering soil absorption of floods) so as to indicate the need to articulate those measure in an integrated approach.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Amended to address issue of balance
2. The PSP in the Urban Sector	Regulatory instruments are not prominent, in the paper. GCF could also play an important role here in e.g. fostering low-emission mobility systems and reducing fossil fuel subsidies.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Regulatory issues are discussed in Section 4.2 and 4.3 but now also added in Table 6 of Section 5.3
2. The PSP in the Urban Sector	Suggested text: The form and management of urban areas can have a profound impact on both the effectiveness of the transport system in reducing its GHG impact, especially in relation to avoiding unnecessary travel and more effective inter-modal operation, and on the resilience of the population.	Advisor to Board Member (BM) Heike Henn, Germany-The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. Feel existing formulation is clearer
2. The PSP in the Urban Sector	Recommend plainer language.	USAID	Point taken, but feel the existing formulation is accessible to the intended audience. See above. Additional detail will be given in the Annexes

2. The PSP in the Urban Sector	This is predicated on urban land use planning, which may not exist in many developing cities.	USAID	It is not that planning does not exist it is that it is not enforced. This is related to the "informality" issue that has been introduced in Sections 4.2 and 5.3
2. The PSP in the Urban Sector	This is one element only. Better: "by comprehensive application of economic instruments, such as high gasoline prices"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended
2. The PSP in the Urban Sector	This very much depends on the city and specific populations within the city—if there are no alternatives, behavior is inelastic to gas price changes—and this can be quite regressive.	USAID	Agree. See above
2. The PSP in the Urban Sector	This and TOD are interesting additions for the GCF. The reality is that these interventions are expensive and have relatively low emissions benefits (but huge co-benefits on economic development, air pollution, health, etc). Transport efficiency improvements (fuel economy standards mainly) are the most effective and cheapest to implement. Does this mean the GCF would prioritize projects like this that are more holistically beneficial for cities, but are not as effective as reducing emissions?	USAID	The cobenefits are important because they support the adoption of LC transport and green building solutions on a large scale. As to net GHG benefit, while the benefit in terms of a particular technology is small, the ability to implement at scale across a city is important and produces large gross benefits.
2. The PSP in the Urban Sector	Particularly in the context of metropolitan regions and periurban settlement structures, an increase in freight transport can be observed with rising energy consumption and high GHG emissions (35% of total transport emissions). In the development and implementation of urban development and transport concepts, this must be taken into account in terms of decarbonisation.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Freight added in Sections 4.1 and 5.3
2. The PSP in the Urban Sector	Circular Economy: Improving Waste Management in Cities by Reducing Methane Emissions from Landfills <u>as well as Black Carbon Emissions from Open Burning</u>	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Title amended and open burning is referenced. See below
2. The PSP in the Urban Sector	Following a life-cycle assessment approach around 10-15% of global GHG emissions could be reduced through improved waste management through enhanced recycling, energy recovery from waste as well as optimised waste transport. If the effects of waste prevention to avoid emissions from the use of primary resources and waste recovery for other sectors are included, the contribution of waste management related measures to total GHG mitigation could increase to 15-20%. Source: UNEP, ISWA (2015) Global Waste Management Outlook. p. 12.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Text added

2. The PSP in the Urban Sector	Open burning is a widely practiced method of solid waste disposal in many regions of the world. Black carbon (BC) is a particularly serious air pollutant emitted from the uncontrolled burning of waste in open fires because it has a global warming potential (GWP) up to 5000 times greater than carbon dioxide (CO2) and is also linked to detrimental health impacts due to air pollution. The IPCC inventory does not (yet) take into account BC emissions from open burning. Recent research findings suggest that BC emissions from open burning of waste could amount to 2–10% of global CO2Eq emissions, and are about 2–8 times larger compared to methane (CH4) CO2Eq emissions arising from the decomposition of equivalent amounts of combustible biodegradable waste disposed at dumpsites. [A1]	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Text amended
2. The PSP in the Urban Sector	We would consider Materials and Material flows rather a general and systemic challenge of economic processes and industrial production. While the end consumer is predominantly urban, it is questionable if this topic is suitable to be approached from an urban angle only	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Agree. Other guidelines will also address the issue, but city administrations have some influence
2. The PSP in the Urban Sector	Applying circular economy strategies in just five key areas (cement, aluminium, steel, plastics, and food) can eliminate emissions of about 9.3 billion tonnes of CO2e in the production of goods in 2050 (that would be equivalent to cutting current emissions from all transport to zero).[A1]	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Good point. Table 3 amended
2. The PSP in the Urban Sector	Table 2 - Circular Economy: Improving waste management in cities by reducing methane emissions from landfills. Waste diversion from landfill is a crucial step in reducing emissions from landfills. In particular the diversion of organic/green waste is paramount in reducing these emissions, as this type of waste, besides generating methane through decomposition, it is difficult to manage and properly compact in landfills, thus leading to landfill fires. Landfill fires are extremely frequent in poorly managed landfills, which is the case more often than not in developing countries, also generate black carbon and UPOPs(unintentional persistent organic pollutants), with serious adverse effects on the environment and human health. The diverted organic/green waste could be easily transformed in compost and used either as cover material for landfills if low-grade (acting as a decomposition layer for methane) or, if high-quality, it can be used in agriculture - providing additional mitigation and adaptation co-benefits.	RWA Group SCE, Green Partners Ltd.	Agree. Table 3 amended
2. The PSP in the Urban Sector	Same comment provided for the executive summary under #1	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	As above
2. The PSP in the Urban Sector	In the last paragraph of the section - NDAs is not included in the Abbreviations list	RWA Group SCE, Green Partners Ltd.	Thank you. Amended.
2. The PSP in the Urban Sector	This is not mentioned in the Agriculture Guide. Should try to be consistent.	GCF Secretariat	Editing issue.
2.1	Table 2 - another good table that is clear & packed with relevant info	Executive Director, Climate Markets & Investment Association	Thank you.

2.1	The introduction of the PSPs would be a critical place to outline the specific PSP connections with human rights and the SDGs.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Done. Human rights and SDGs introduced into Section 4.1.
2.1	"Cool and green roofs can reduce temperatures and also help to reduce energy demand and CO2 emissions in cities by 3.3 ± 0.5 Gt for the summer months." This is one of the very few components of adaptation in this guide, but it fails to recognise that not all buildings are designed to accommodate green roofs. Building morphologies, which are not all unified/standard across the world may require different solutions. At this point, it is unclear if this guide is attempting to be prescriptive or if it is just providing examples (which often do not consider the informal settlements that exist in a lot of developing country cities).	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	These are examples.
2.1	"Particular attention should be paid to ecosystems within urban areas, which provide important benefits by transforming resources (or environmental assets, including land, water, vegetation and atmosphere) into a flow of essential goods and services e.g. clean air, water, and food." While it is important to preserve and protect land, water, etc in the urban areas – it should not allude to an idea of financialisation and privatising these "environmental assets" which should rightly be public commons and not traded.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Ok. Noted.
2.1	It is not correct to focus only on distributed technologies. District heating it is important for example in those countries with cold climate.	Board Member	Agree. PSP3 and Table 3 amended to include. Energy Guide will elaborate.
2.1	Table 2 on "Improving Energy Efficiency of Building Stocks" has a rather narrow focus on energy consumption in buildings, without consideration of the larger aspect of carbon emissions contributed by the building sector through cement production. Cement production is the source of about 8% of the world's CO2 emissions due to its fossil fuel dependence. If the cement industry were a country, it would be the third largest emitter in the world. It contributes more CO2 than aviation fuel (2.5%) and is not far behind the global agriculture business (12%). Read more: https://www.carbonbrief.org/qa-why-cement-emissions-matter-for-climate-change . This might have been addressed in a separate sectoral guide (Forest and Land Use on sustainable construction materials, referenced on page 7), but the separation of these intricately linked aspects into different sectoral guides is not helpful when it is important to form a more holistic scope and understanding of the city's impact and its role in climate action; which often requires a system change in the construction industry.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Agree. Amended.

2.1	Table 2, "Compact and Resilient Urban Development" point 3 - Is this only for new/future developments, or does it also include reorienting transit in existing environments to its optimal service, and contribute towards reducing existing emissions (instead of just focusing on future emissions)?	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Guide includes existing areas - addressed under "retrofit" business models.
2.1	Table 2, "Compact and Resilient Urban Development" point 7 - Why hinterland only? Coastal areas also provide resources for the community and must be protected. Again, the term 'environmental assets' should not allude to the idea that it should be financialised and privatised for it to be protected.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	The hinterland referred to includes coastal areas.
2.1	Table 2, Compact and Resilient Urban Development point 9 – The modal shift to mass transit, walking, and cycling cannot happen at scale if the planning practices and zonation continues to segregate functions of the city into parcels that require forced mobility. For example, the concentration of work and market space in one centre, and due to inaffordability the relegation of housing to city outskirts forces people to commute to work, or for recreation, etc. Not only that, in countries where public transport modal share is low, the public transport systems continue to suffer from lack of investment (which leads to poor service) due to the lack of ridership – how will GCF evaluate such problems?	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	True. Financial models in Section 5 address this issue.
2.1	Table 2: In the discussion of the circular economy, the focus is exclusively again on materials and emissions, not people. So, for example, there is no discourse on supporting changing consumption patterns, or gender-differences in consumption or material use, re-use and recycling. This seems outdated and too narrow a framing (see f. ex. for a gender-perspective on a circular economy, http://www.oecd.org/env/GFE-Gender-Issues-Note-Session-5.pdf)	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Noted. Can be addressed in detail in business model Annexes.
2.1	"Power" refers only to electric power. We need to address decarbonization of urban energy system in the overall broader picture, i.e. also in district heating/district cooling at all sizes.	Board Member	Agree. Now included in PSP 2 and the Energy Guide will elaborate.

2.1	See comment above on sources and literature reviewed. It would be helpful to have figures on potential impact also from other technology options, including heating systems, renovation of facades and windows, adoption of new products and evolution of systems and component (e.g.: 3D printing; development of robotics; so-called Internet of things), development and spread of information technologies within three different and interrelated fields, intercooperation among all the players of the chain; interoperability of models to support improvements of processes, design systems, building management and maintenance; adoption of Building Information Modeling (BIM) for the reduction of design errors and rework in construction and engineering projects.	Board Member	Agree. But do not have data.
2.1	In this paragraph the measures proposed are not clear. Could you please clarify further?	Board Member	Can clarify more in Annexes but difficult to elaborate in the overview document.
2.1	It would be helpful to have more details, regarding literature, best practices, successful models and technology and management solutions about adaptive investments to the impacts of climate change in urban areas, particularly where local climate extremes can be exacerbated. Improvement of green urban infrastructure with increased use of nature-based solutions could for example reduce flood and drought, enable water conservation, and reduce urban heat island effects. We would be particularly interested to have possible examples of fit-to-context adaptive investments to respond to regional needs, i.e. in urban areas in LDCS and Africa.	Board Member	As above
2.1	This seems to be focused very much on mitigation. May be a more balanced approach will be better aligned with our programming approach for GCF-1.	Office of Portfolio Management GCF Secretariat	Adaptation issues have been further developed in the ES and in Sections 4 & 5.
2.1	While the premise of the paragraph is to discuss compact and resilient urban development, it only talks about transport management and modal-shift ideas. It is not clear as to how those discussed actions strengthen resilience of the population.	Asian Development Bank	Agree. Paragraph clarified.
2.1	Innovative and smart energy management practices including digitization and internet of things are being increasingly used in commercial and residential buildings. These measures are essential for next generation of innovation and energy management and could also be included as many developing countries are moving towards smart-cities.	Asian Development Bank	Text around PSP 2 in Table 3 changed to reflect this issue.
2.1	Energy Efficiency in Street Lighting also to be considered as one of the urban sector improvements.	Climate Finance Associate, E2C2 at EBRD	Added to PSP3 in Table 3
2.1	Table 2 - Following on from Comment #2, the measures and actions to deliver PSP2 (energy efficiency in buildings) can also address climate resilience challenges. For example, better insulation and green roofs also provide climate resilience outcomes of more liveable buildings, improved human health and productivity, reduced urban heat, etc. These dual benefits should be included.	Climate Finance Associate, E2C2 at EBRD	Agree, but addressed under PSP3.
2.1	Table 2 - Decarbonisation of energy sector: distributed RE, especially PV, might not be a viable or technical possible solution (e.g. because of small roof space). It is also depending on government support schemes and more expensive than large scale installations. Potential solutions should allow a broader range of low carbon energy supply e.g. heat pumps, purchase of certified RE etc.	Climate Finance Associate, E2C2 at EBRD	Agree. More generalised approaches to finance set out in Section 5 will facilitate these options.
2.1	Table 2: Improving EE of building stock: In addition to stated interventions (envelope improvements and green roof), sustainable heating and cooling should be added as an important improvement with high impact.	Climate Finance Associate, E2C2 at EBRD	Agree. Text modified in Table 3.
2.1	Table 2 - Compact and resilient urban development can consider urban regeneration schemes with cross-building use, higher sustainability requirements for new development areas and avoid heat islanding effects.	Climate Finance Associate, E2C2 at EBRD	Retrofit options are included in Section 5 financing modalities and Table 5.

2.1	Table 2 - Compact and resilient urban development: Nature based solutions can help build resilience in cities - such solutions are partly covered in Energy Efficiency PSP under green roofs and walls but will also be a beneficial initiative to build resilient cities with integrated 'green' urban fabric.	Climate Finance Associate, E2C2 at EBRD	NBS now included in both PSP 2 and 3 throughout document.
2.1	Table 2 - Compact and resilient urban development: Another important aspect of improving mobility in cities is an integrated transport system with a user friendly interface - including ticketing method, payment platform, real time data, accurate information, etc.	Climate Finance Associate, E2C2 at EBRD	Agree, but too much detail for overview document - can include in Annexes.
2.1	Table 2 - Compact and resilient urban development: Based on the context, POD (pedestrian oriented development) should be explored alongside TOD. The concept of 15-minute city as an alternative model has gotten momentum during the pandemic and should be explored beyond as this will help decarbonise cities in the long term.	Climate Finance Associate, E2C2 at EBRD	As above
2.1	Table 2 - Circular economy: the definition focuses on end of life solely, rather than having a full cycle approach. Circular economy could take into account understanding user demand and shifting demand as well.	Climate Finance Associate, E2C2 at EBRD	PSP4 substantially revised in Table 4 to reflect the issue.
2.1	Table 2 - Circular economy: should also focus on construction material their embodied carbon and recyclability.	Climate Finance Associate, E2C2 at EBRD	As above and in PSP2
2.1	In addition to abatement potential, Impact potential is about: 1.Speed of implementation 2.Adaptation or mitigation benefits (or both) 3.Job creation potential 4.Direct economic benefits (e.g. cost savings) 5. Trade-offs: actions/measures with countervailing effects on mitigation & adaptation i.e. mitigation actions which increase risk or adaptation actions that increase emissions.	Advisor to BM Josceline Wheatley	Noted.
2.1	"Power" refers to only electric power. We need to address decarbonization of urban energy system in the overall broader picture, i.e. also in district heating/district cooling at all sizes.	Board Member	See row 101
2.1	This deeply connects with the heating/cooling factor as a step necessarily subsequent to a smarter energy distribution.	Board Member	As above
2.1	It would be interesting to take into consideration all the effects caused from the COVID-19 pandemic on the transit system. Such investments and projects should look at the forecasts related to how the mobility will be different once the current situation is over.	Board Member	Agree, but too early as per row 40.
2.2	pg 16 "limited access to international finance was the second most common challenge reported" we suggest to create a breakout box of sorts about "why cities need the private sector?" as PS allows for another way to leveraging potential domestic finance outside of 'international finance'. We anticipate that this will encourage public sector to explore ways to crowd in PS if it's highlighted in a breakout box	Executive Director, Climate Markets & Investment Association	Agree that it is important but do not want to make too much out of a limited survey that was designed mainly to confirm the priority of barriers identified by the OECD and discussed in section 4.2
2.2	Discussion of lack of barriers, which indicates need for buyouts and community resettlements, needs to confront the challenges of informal settlements and lack of land ownership rights for a large segment of affected city populations	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Informal settlements now referred to in Sections 2, 4, 5 and 7
2.2	The lack of aggregation models for small projects is another barriers which need to be addressed. One important point is, that building renovations create multiple benefits which don't generate a revenue for repayment of investment. Also market distortions by subsidised tariffs hinder building renovation.	Climate Finance Associate, E2C2 at EBRD	Agree. Although referred to in Section 5 have added the issue as a barrier in section 4.1

2.2	"Barriers in relation to knowledge and performance data associated with LECR urban infrastructure which limit the potential for replication and scale", should include a bullet on a lack of robust climate analytics providing sufficient insight into the climate risks relevant to cities and the economic benefits of proactively addressing those risks	Climate Finance Associate, E2C2 at EBRD	Agree. Added.
2.2	Lack of transparency, existence of corruption, informal sector - could all be barriers in the policy and institutional space in addition to those mentioned.	Climate Finance Associate, E2C2 at EBRD	Amended Section 4.2 covers
2.2	Lack of data on demand and users could also be a barrier in supporting PSP solutions.	Climate Finance Associate, E2C2 at EBRD	As above
2.2	Additional barriers are: *limited fiscal autonomy *lack of creditworthiness *electoral changes *lack of understanding and developing suitable financing models	Head of Innovative Finance, ICLEI	As above
2.2	It is pointed out that:"The most common response was the low capacity of urban public actors to develop projects ready for investment. " what is missing or not elaborated in detail how GCF wants to address that	Head of Innovative Finance, ICLEI	Project development support indeed needs to be upscaled as stated in Table 4, but will be further elaborated in partnership and detail financing strategies in Annexes.
2.2	Barriers regarding financing structures: FMDV suggests to add "Lack of financial intermediary to channel climate finance and diversify the sources of funding"	Director of Programs, Global Fund for Cities Development -FMDV	Amended Section 4.2 covers
2. The PSP in the Urban Sector	Regarding "Barriers involving the lack of enabling policy frameworks, integrated policy and planning systems , and institutional capacities", many developing countries actually do have such institutional arrangements, which came about after decentralization in the '90s and into the '00s. Suggest focusing on the main barriers: institutional capacity and governance in developing countries, as urbanized areas do indeed have mandates.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree but they vary among countries and cities. The overview Guide is general and cannot cover all detail circumstances. The Guide emphasises the need to adapt to the circumstances of the city.
2. The PSP in the Urban Sector	We hope GCF could double check on country-specific data, and illustrate the data references from reliable sources, e.g. "For example, in China, the total loss due to drought projected in 2030 is expected to range from US dollar 1.1 to 1.7 billion for regions in the northeast China and about US dollar 0.9 billion for regions in north China, with adaptation measures having the potential to avert half of the losses" (Page 15, para.4). If no reliable data sources could be found, we would rather suggest to delete this sentence.	China Board Member	Reference checked
2. The PSP in the Urban Sector	Is it also worth adding that disclosures are often inconsistent, both from one organisation to another, and also – within an organisation – from one year to the next?	GCF Secretariat	Agree thus is important but it is a result of inadequate regulatory framework and enforcement which is covered in the Guide
2. The PSP in the Urban Sector	The Agriculture Guide also includes cross-cutting enablers in this section. Should try to be consistent.	GCF Secretariat	See above discussion of enablers
2. The PSP in the Urban Sector	A barrier in developing countries is also corruption in public procurements. Measures to counter this problem should also be discussed within this Sectoral Guide.		The issue is addressed in terms of bad enabling and regulatory frameworks - AEs are vetted for robust anti-corruption policies

2. The PSP in the Urban Sector	The question of land tenure perhaps deserves a place here: cadastres and land titles but also the availability of data on territories.	Stephane Cienniewski, Alternate Board Member	This issue is arguably covered under "planning systems" but point taken and reference to land management systems added
2. The PSP in the Urban Sector	Perhaps also a difficulty in terms of accountability/accountability?	Stephane Cienniewski, Alternate Board Member	Agree. Amended
2. The PSP in the Urban Sector	Should be "supply of"	GCF Secretariat	Thank you. Amended
2. The PSP in the Urban Sector	Something is missing here.	GCF Secretariat	Thank you. Rephrased
2. The PSP in the Urban Sector	Suggest "large and unfamiliar, and which stretch"	GCF Secretariat	Agree. Amended
2. The PSP in the Urban Sector	Also barrier at national government level → unfavourable national framework conditions for cities to undertake/foster such investments?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Clarified.
2. The PSP in the Urban Sector	A major issue worth consideration are the financial systems of cities and their readiness to accept international funds. Transparency will be a problem.	USAID	Agree. But covered under "enabling framework"
2. The PSP in the Urban Sector	New suggested text: Often, national regulations and guidelines impede the development of sustainable mobility solutions. Therefore, support for development of National Urban Mobility Policy and Investment Programmes (NUMPs) and Sustainable Urban Mobility Plans (SUMPs) as action-oriented catalogues of measures for environmentally friendly urban transport is indispensable.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. But too much detail. Will address in Annexes
2. The PSP in the Urban Sector	There is limited local knowledge on how to shift pathways in the sense of adequately funded institutions and institutional arrangements that enable sustainable urban policies and implementation, including education, professional training, research and development (e.g. on sustainable urban mobility). This can be overcome by providing dedicated funding for capacity development alongside large-scale projects.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	This is a viable and useful option but is at too much detail for the overview Guide. Will address in Annexes
2. The PSP in the Urban Sector	We have seen even in developed countries that this is highly controversial and almost impossible. Reference perhaps entire communities relocating 1,5km inland in Fiji and the absolute upheaval in terms of traditions and local knowledge, not only associated costs. It could also be very controversial for the GCF to finance relocation.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree

2. The PSP in the Urban Sector	Would be good to specify the government level	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended to clarify - all levels
2. The PSP in the Urban Sector	definition	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Sometimes new entities are needed to plan comprehensively and implement programs of investment - eg development corporations. These are addressed WHERE???
2. The PSP in the Urban Sector	+ institutional barriers of domestic FIs/NDBs, i.a. lack of capacities and lack of clear mandate for urban LECR investments; limited access to international concessional finance, etc. Would then better reference to respective paragraph under 3.1	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Referenced.
2. The PSP in the Urban Sector	Guide could link to, or provide, such definitions and guidance notes on existing taxonomies, CDP, etc.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	CBI and EU taxonomies will be referenced in Annexes
2. The PSP in the Urban Sector	The importance of cooperation between levels of government (local and state/national) could be elaborated upon, as conceptualized in multi-level governance/vertical integration/collaborative climate action – see for example “Recover green: Higher NDC-Ambition through Collaborative Climate Action” (GIZ 2020).	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Issue added to clarify in Section 4.2
2.3	Table 3 is clear	Executive Director, Climate Markets & Investment Association	Thank you
2.3	Why only national development banks? A more appropriate term would be National Development Financial Institutions (or National DFIs). In countries like India, there are several State-owned/public DFIs which are non-banking (i.e. do not accept depositors) in nature.	Asian Development Bank	We include in NDBs as defined in footnote 21
2.3	Table 3 - Energy efficient building: ESCOs are Energy Service (not "saving") Companies. While ESCOs can be effective, their potential is also limited by a number of factors. Energy performance contracts as another option should be included.	Climate Finance Associate, E2C2 at EBRD	Agree. But covered in overview document under "and other arrangements..."
2.3	Table 3 - Mobilisation of Financing at scale: carbon finance could serve as an important additional revenue stream for mitigation interventions in the urban space, so GCF could encourage and facilitate cities' access to domestic and international carbon markets.	Climate Finance Associate, E2C2 at EBRD	Good point. But is relevant across PSPs - added in explanatory text.

2.3	<p>On Table 3: Drivers of change across paradigm-shifting urban action pathways - For the PSP Decarbonised & distributed energy</p> <p>Recommendation: we suggest including the following examples as well on the Transformational Planning and Programming driver: Mention other RE technologies such as solar thermal; grid strengthening; smart grid/metering; district energy; district heating; energy planning; small solar or wind parks. It is important to emphasize the need for enabling environment frameworks for a sustainable technology penetration. This involves policy (integrated planning, access to land or space related agreements, minimum energy performance standards, targets for market penetration and increase of renewables), institutional strengthening (agreements with utilities and customs, coordination with different sectoral planners), financial incentives (Feed in Tariffs, subsidies, tax break), capacity building (training of city officials to understand the benefits and costs of the technology, training of installers, architects, communities, promoters, small and medium enterprises), supply chain schemes (market availability of the technology in the right price point, maintainance, roster of installers), awareness raising (knowledge sharing schemes, help desks, awareness raising campaigns, hotlines, web tools). UNEP has an initiative on District Energy in Cities that could be mentioned here: https://www.unep.org/resources/factsheet/district-energy-cities-initiative</p>	UNEP	Table 4 is not designed to canvass a wide range of examples - only to lay out strategic directions for GCF assistance/ action. Also some of the issues raised will be addressed in more detail in other Sector Guides. But this is excellent input to Annex on detailed business models.
2.3	<p>On Table 3: Drivers of change across paradigm-shifting urban action pathways - For the PSP Energy Efficiency in Buildings.</p> <p>Recommendation: we suggest including the following examples as well on the Transformational Planning and Programming driver: Policy (building codes, EE standards, area-based performance standards, certified materials supply, EE targets for different building categories including social housing, demand reduction, load shifting, peak-shaving), institutional strengthening (agreements with builder and architects associations), financial incentives (consumer incentives such as tiered/rated billing), capacity building (training for builders, architects, suppliers, training for city officials on procurement), awareness raising (state of art models to visit, awareness raising campaigns, city hotlines, web tools). UNEP is focusing on this through its work on buildings (Global Alliance for buildings and construction - https://globalabc.org/), on energy of appliances (United for efficiency https://united4efficiency.org/). Nature based solutions could be highlighted as an option here.</p>	UNEP	As above
2.3	<p>On Table 3: Drivers of change across paradigm-shifting urban action pathways - For the PSP Compact & resilient urban form</p> <p>Recommendation: we suggest including the following examples as well on the Transformational Planning and Programming driver: City wide (land use planning, spatial framework, climate action targets, GHG inventories, green area targets, set of city indicators, transparent dashboard for public control of municipal actions vis-a-vis agreed targets and indicators, georeferenced plans, platform to allow planners to plan together considering different sectors, land use policies to avoid urban sprawl, protecting ecosystem services in the city, flood control systems, promotion of green belts and networks, densification), area based approaches (green neighborhood targets, designs, low emission zones, urban ecosystems, rehabilitations, compact areas, nature based solutions, air quality standard, green space, energy consumption, lighting levels, reducing heat island effects, recreational area, promoting non motorized transport, safe walking roads, shared biking schemes). Capacity building of city planners, policy reviews, tax incentives, etc. We suggest to emphasize more the importance of dealing with urban issues in an integrated way and of integrated planning to avoid incoherent urban development and maximise benefits (link issues of building with access to transport, green spaces, jobs, etc.). UNEP has developed INTEGRATED GUIDELINES FOR SUSTAINABLE NEIGHBOURHOOD DESIGN - (https://www.neighbourhoodguidelines.org/), which fits well here. Nature based solutions could be highlighted as an option here.</p>	UNEP	As above

2.3	<p>On Table 3: Drivers of change across paradigm-shifting urban action pathways - For the PSP Circular urban economy</p> <p>Recommendation: in the Transformational Planning and Programming driver we recommend expanding the scope of circular economy beyond waste streams. There are many examples of circular economy thinking with significant saving potential going beyond waste. In fact, many of these examples also include adaptation benefits cutting across both adaptation and mitigation. For example, circular economy should also look upstream, at the different materials (land, air, water and raw materials). Improving air quality reduces the need for air conditioning, allowing buildings to use natural air circulation. Composting organic waste and promoting peri-urban agriculture has multiple benefits of reducing transport costs, converting or using land to green space bringing ecosystem services for temperature control, air filtration, and storm water management, while also using these spaces to manage sprawl (i.e. green belts) and provide local employment. On water resources cities are having to source water from increasing distances in regions where climate change is reducing rainfall. In these locations taking a metabolic review of local water supply, water transport and demand can help balance local water supply with demand. Projecting water supply, reducing leakages, improving treatment and managing demand, using rain water capture opportunities in cities more effectively are all strategies that planners should use to balance supply and demand. There are many paths to capturing energy from waste sources, including methane from landfills; waste heat and steam from industrial processes, and combusting high calorific, dry waste streams for energy. Nature based solutions can be considered as well here. IRP The weight of cities report (https://www.resourcepanel.org/reports/weight-cities)</p>	UNEP	As above
2.3	<p>The Circular City of Tomorrow (https://www.eib.org/attachments/thematic/circular_economy_15_steps_for_cities_en.pdf)</p>	UNEP	Noted
2.3	<p>It would be useful to consider also infrastructural innovations here, to avoid missing a reference to the broader system of infrastructures and related networks supporting technology innovations, which have an important role to play when dealing with the PSPs</p>	Board Member	Agree. PSP2 amended
2.3	<p>In scaling up climate finance and enhancing cooperation with the private sector, the GCF, in line with the recently approved USP, should also aim to explore innovative financial models through combination of diversified financial instruments available on a country- and demand-driven basis. The role of AEs and DAEs will be key in this context taking into account the priority to strengthen the engagement capacity as a key priority area for the GCF business model to support planning, programming and investment design as well as development of the climate investment capabilities of national investment institutions (such as through building novel investment partnership with long-term institutional investors, see USP para 23b) . Structuring options to attract larger institutional sources of finance through aggregation and securitization, and improve affordability of technologies, is clearly identified in the USP as a mean to mobilize private sector resources at scale (USP para 23c)</p>	Board Member	Noted. Added to beginning of Section 5 and will be addressed in detail in Annex.
2.3	<p>add "optimising not just economics, but balancing with decarbonisation and social impact goals."</p>	Board Member	Noted. Added to Section 7.6.
2.3	<p>Transformational planning and programming for a circular urban economy doesn't begin with recycling, the first thing listed in this table. Reduce, re-use, recycle is in the order the operations should be performed, and reducing demand for goods and providing collective alternatives to individual (over)consumption must be a key step: cities cannot recycle their way into the level of reduced emissions necessary to limit climate change to 1.5 degrees or less.</p>	<p>As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations</p>	Agree. 5R now cited in Table 4.

2.3	Please explain better.	Board Member	Some clarifications made.
2.3	Could be useful to be more specific here. See textual proposal	Board Member	Agree. Table 3 amended to clarify and Energy Guide will elaborate.
2.3	In addition to these examples, It could be useful to assess models to evaluate long-term repayment of investments deriving from long-term energy efficiency gains, e.g., potential lower operating costs and reduced energy costs in the cooling sector.	Board Member	As above
2.3	Please clarify why the mechanism should finance brownfield development and how this concept fits with the GCF business model to deliver low emission and climate resilient paradigm shifting pathways.	Board Member	Brownfield financing mechanisms approached under "retrofit" in Section 5.3.
2.3	As we believe it is important to foster adaptive investments to the impacts of climate change in urban areas, that should also consider local context-specific conditions, it would be nice if we could further elaborate on means to enhance the role of the private sector in adaptation (see for example the USP in para 23e)	Board Member	Noted. Added to the beginning of Section 5.
2. The PSP in the Urban Sector	The title of this section in the Agriculture guide ("Role of the GCF in financing the paradigm shifting pathways") is much simpler	GCF Secretariat	Editing issue
2. The PSP in the Urban Sector	See comment above & suggests to delete text	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. Point important
2. The PSP in the Urban Sector	In Table 3 it might help to add improved capacity to evaluate financial and social costs and benefits to guide policy and investment	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Now Table 4. Assessment added under 4th driver
2. The PSP in the Urban Sector	These headings should match page 12	GCF Secretariat	Page 12 PSP description of renewable energy is summarised in the table
2. The PSP in the Urban Sector	Not sure what this refers to	GCF Secretariat	Describes the fact that business models that depend on power savings can be undermined because savings do not always accrue to the user - either because rent includes utilities or because full cost of production is not passed through
2. The PSP in the Urban Sector	Should this be "Service" (as in the abbreviations)?	GCF Secretariat	Yes. Thanks. Amended

2. The PSP in the Urban Sector	<p>Something is missing here.</p> <p>Should "FSR" be in the abbreviations?</p>	GCF Secretariat	<p>Text amended.</p> <p>No. Only used once but the abbreviation is often used so included in text</p>
2. The PSP in the Urban Sector	In table 3, first and second columns on "Compact & Resilient Urban Development" are confusing. A clearer differentiation between transport (and what transport ministries are in charge of) and urban planning (and what urban ministries are in charge of) would be appreciated: low emission transport and fleet capacity have nothing to do with urban development. A separate row for each would be clearer. Otherwise, you refer to urban in one column, but not in the following ones. Urban issues are not addressed consistently.	Head of sector Transport and Urban Development, UfM	Agree they are distinct. But they are so inter-related that it is difficult to separate in overview text
2. The PSP in the Urban Sector	In table 3, "Compact & Resilient Urban Development" row, the first column, in second paragraph starting "Planning & incentives...": why don't we talk here about "nature-based solutions"?	Head of sector Transport and Urban Development, UfM	Text amended.
2. The PSP in the Urban Sector	In table 3, "Compact & Resilient Urban Development" row, second column, the reference to Land Value Capture is weird. LVC is just a tool. It would make much more sense to refer to what you aim to achieve by using LVC.	Head of sector Transport and Urban Development, UfM	LVC is a revenue modality that is an example of an innovative mechanism for implementing transport/adaptation projects. Have introduced Payment for Ecosystem Services as another mechanism for Nature Based Solutions
2. The PSP in the Urban Sector	In table 3, "Compact & Resilient Urban Development" row, second column, a clearer description of "infrastructure to respond to climate change" would be appreciated. In general terms, putting myself in the shoes of someone dealing on urban development in a ministry, my general comment is that the document is not putting much light on what kind of urban projects (and I am referring here to urban development, land planning and town planning projects) the GCF would support.	Head of sector Transport and Urban Development, UfM	Examples added
2. The PSP in the Urban Sector	Globally, the document seems to mainly focus on transport of people. Transport of goods (freight) is also responsible for important emissions.	Stephane Cienniewski, Alternate Board Member	As above, freight added in Sections 4.1 and 5.3
2. The PSP in the Urban Sector	We welcome this matrix, but rather than having a broad array of potential options, we would rather have expected more practical guidance	Advisor to Board Member (BM) Heike Henn, Germany-The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Some examples added but will give more detail in Annexes
2. The PSP in the Urban Sector	A better example than FITs would be a net-metering regulation or incentives for roof-top solar applications	Advisor to Board Member (BM) Heike Henn, Germany-The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree FITs are only one example but more detail will be given in Annexes
2. The PSP in the Urban Sector	Carbon market: A strong national or regional CO2 price is a powerful market signal. It gives market actors guidance and help to mobilize public and private financial means for low carbon activities. Therefore, we strongly encourage the GCF to include in its policy dialogue activities not only city representatives but also national and regional ones to make the case for the development and implementation of CO2 pricing mechanisms like a CO2 tax or emission trading schemes	Advisor to Board Member Jan Wahlberg, Ministry of Foreign Affairs, Finland	Agree. More detail in Annexes.

2. The PSP in the Urban Sector	New text: Invest in new business models that derive revenue from (large scope) CO2[1] emission reductions in urban development. For example, through mechanisms that reduce the up-front cost of capital investment eg pay-as-you save schemes. Comment: ? Wouldn't that be an example for Energy efficiency.... Here maybe better business models to cluster roof-top installations with an over-time down-payment-scheme.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. The example is of a mechanism that pays for rooftop solar - distributed energy. But reworded to clarify
2. The PSP in the Urban Sector	Inserted text: and zero-emissions buildings	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
2. The PSP in the Urban Sector	? what is the sentence	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
2. The PSP in the Urban Sector	Added text: Promote and mandate energy ratings and new performance standards (appropriate to both cold and tropical climates) to incentivize	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
2. The PSP in the Urban Sector	Incentivize business activity on net zero buildings and efficiency measures by facilitating and investing in innovative ESCOs and other arrangements that derive revenue from energy savings and services.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
2. The PSP in the Urban Sector	Better incentives & network planning for integrated low emission transport; avoiding and intervening against forced mobility <u>induced demand</u> effects.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Prefer the forced mobility formulation as discussed above
2. The PSP in the Urban Sector	Definitions needed, potentially in a footnote	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Done

2. The PSP in the Urban Sector	To support and implement infrastructure for sustainable cities, GCF should not close the door to funding for low-risk, quick-to-implement, transformative and innovative urban solutions like e.g. TUMI and CFF pilot projects.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. GCF needs to better integrate with project development facilities - CFF projects are also examples and it is included as a case study in Section 6 and the issue is addressed in the partnership strategy in Annex
2. The PSP in the Urban Sector	Invest in new market structures for Reduce, Reuse, <u>Repair</u> and Recycle (43R)	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
2. The PSP in the Urban Sector	Improved municipal solid waste management as well as establishing an urban circular economy requires local decision makers to assess different technological and business options for the local context such as different waste streams, sectors, city size, financial capacities and logistical circumstances (in line with the principle of the waste hierarchy), as well as associated co-benefits. It needs to be supported by national policies such as schemes for Extended Producer Responsibility (EPR) as well as capacity building.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Good point, but too detailed for the overview Guide. Will address in Annexes
2. The PSP in the Urban Sector	Table 3. Fostering incentives for WTE investments might send the wrong message. Waste to energy should be the least preferred option, after landfilling and incineration. It should only be employed for difficult waste streams which currently exist but should be avoided in the future, or in very particular situations/local contexts and under strict regulatory provisions and control. Often small countries take on the solution of waste to energy as a cure-all for their waste problem, only looking at investment costs and forgetting the high operational costs of such investments. When failing to meet these costs, they go back to landfilling/open dumping. Lack of adoption and enforcement of environmental standards in such country brings on other issues, even when operation of WTE facilities is secured. Practice shows that lack of social acceptance can often hinder the operation of such facilities. Another issue is that WTE does not support waste reduction. It is better to incentivise options higher in the waste hierarchy. Industrial symbiosis might perhaps be a better example to feature in lieu of WTE in this table.	RWA Group SCE, Green Partners Ltd.	Agree, but other examples are cited. Text amended to qualify use of WTE
3	This section, which in other draft sector guidances is called "Financing paradigm-shifting pathways in..." is here titled "Financial Structuring". This reflects a narrow and almost exclusive focus on financialization and blending, with a disregard for the core role of public financing and some of the public goods that can only be provided through public financing in urban landscapes. In this respect the discourse on pp.24-25 comparing the "efficiency" of GCF support for public vs. private finance projects in this sector is disingenuous (and a concentration on price of CO2 abatement cost is too narrow) to capture the multiple holistic and cross-cutting benefits that GCF funded investments in this sector should provide .	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Section retitled and more emphasis put on more inclusive approaches, but will need more elaboration in Annexes.

3	While there is discussion of for example green city bond issuance and structuring private sector participation through SPVs, there is no acknowledgement of the transparency and accountability issues related to this to ensure compliance with GCF IDP, ESP, safeguards and gender policies; this also holds true with the recommended use of separate financing facilities developed by AEs (where sub-projects are unknown, and sub-project criteria largely undisclosed at the time of GCF Board consideration) supported by the GCF to aggregate/bundle smaller projects. This has been and is a consistent concern, for example in the implementation of the EBRD Green Cities Facility (FP086) or with respect to the ADB Shandong Green Development Fund in China (FP082).	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Direct city green bond issuance is a very limited modality that has high transaction costs. Facilities can better apply GCF criteria and absorb the transaction costs of such bonds - but agree they have to be closely monitored.
3	What is not sufficiently elaborated in the discussion on financial elements and the accompanying Table 5 is a discourse about efforts and a focus on increasing the access to concessional finance provided by the GCF (with concessionality passed through national or local financial institutions to beneficiaries at the community level) for individual small-scale investors (including households) and in a way that is gender-responsive, inclusive, and, for example, takes into account the reality of informal settlements (and the leveraging potential represented by individual citizens' investments in more RE, EE, and circular economy focused equipment and housing). Again, GCF funded projects and programs in this sector should focus on "mind and material" = incentivizing and also financially supporting behavioral pattern change within societies and communities as necessary corollary to any constructed related infrastructure focus.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Have included discussion of this issue in Section 5.3.
3. Financial structuring: Catalyzing public and private sector finance	It's good to focus on finance, but this section could be improved by focusing on developing country needs and options. Perhaps annex this as background research and replace with structures of urbanized areas in GCF countries of interest and LDCs, and explore options that have worked in those contexts.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	A significant amount of work on this has been done and indeed is intended to be detailed in Annexes
3. Financial structuring: Catalyzing public and private sector finance	Whole chapter overrelies on international funds, they are – and will be – only a very minor part. Focus should be on question how international funds can trigger local resources	Advisor to Board Member (BM) Heike Henn, Germany-The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Disagree. National institutions and capital markets are highlighted from the beginning. GCF's main modality - blended finance - apply to national institutions and indeed mostly rely on them
3. Financial structuring: Catalyzing public and private sector finance	A chapter on the complementarity of the GCF with existing urban development initiative is missing in the paper. In general, there is an increasing number of multispectral and sector-specific urban-climate programs from MDBs and other institutions, which cover a similar spectrum from policy and planning to project preparation support and financing. In addition, the presented sectors have long been identified as the main contributors of GHG mission in urban areas. Consequently, the risk of overlap through a global approach is significant. We therefore miss a chapter that elaborates in detail on the complementarity of this approach with those existing initiatives, as well as main pathways for harmonization. This would be an essential part of a guideline that aims at developing high quality and impactful funding proposals for consideration by the GCF Board.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Agree GCF value add should be the focus. Figure 6 sets out the main action areas for this and the Annexes will detail them
3.1	Figure 3 is helpful to undersand the climate fiannce architecture. Definitely keep in	Executive Director, Climate Markets & Investment Association	Thank you

3.1	Figure 4 - ditto from above	Executive Director, Climate Markets & Investment Association	Thank you
3.1	We welcome the blended finance section starting on pg 21 with the specific examples	Executive Director, Climate Markets & Investment Association	Thank you
3.1	Figure 3: Global Climate Finance Architecture - Carbon markets must be approached very critically. Predatory corporations and failing governance can open doors to more problems via the international carbon market. Carbon trading has drawn serious criticism from environmentalists, civil society, and Indigenous Peoples as it essentially allows the North to evade its duty to reduce emissions, while supporting questionable projects in the South that may not lead to any emission reductions. More about this: https://www.tni.org/es/node/12814	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Noted
3.1	"Resilience bonds – Pays in the event of a triggering event, e.g., natural disaster. Bonds incorporate the value of reduced risk to assets due to a resilience project. Usually issued by a special purpose vehicle which can be set up by an investment bank or similar." In this area the guide is confusing resilience bonds with catastrophe bonds. The text describes catastrophe bonds. Recommend to also refer to Climate Resilience Bonds including making reference to the EBRD's climate resilience bond issuance. The guide may also refer to the CBI Climate Resilience Principles: https://www.climatebonds.net/climate-resilience-principles .	Climate Finance Associate, E2C2 at EBRD	Noted. Amended to correct.
3.1	Regarding the transformational role of NDBs: FMDV suggests to add: "More specifically, Subnational Development Banks – SDBs referring to national public or public-private institutions with a specific mandate to provide funding and financing to local and regional governments for public services provision and investments in infrastructure projects have a key role to play. They can contribute to build the capacity of local governments to finance urban infrastructure projects, develop bankable project pipelines and structure urban and municipal markets in the long term, including for intermediary cities." (see the Human Settlement Climate Action Pathway of the Marrakech Partnership for Global Climate Action p 23 https://unfccc.int/sites/default/files/resource/Action_table_HS.pdf)	Director of Programs, Global Fund for Cities Development -FMDV	Agree. Section 5.1 amended.
3.1	We believe these evaluations concern broader institutional issues that fall out of the scope of sectoral guidelines themselves, and do not provide specific additionality to the development of sectoral guidelines. We suggest to remove this paragraph.	Board Member	Noted
3.1	We support this approach.	Board Member	Thank you
3.1	We support this approach.	Board Member	Thank you

3. Financial structuring: Catalyzing public and private sector finance	Regarding "Commercial banks and investment companies manage nearly US\$70 trillion of assets, while pension funds, insurance companies and sovereign wealth funds (which tend to have lower risk appetites and longer-term investment horizons) represent nearly US\$44 trillion more" - Interesting, but hard to understand how GCF partner could use this information.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	GCF-participated structures such as the SGDF (Section 6.1) are designed to leverage such finance.
3. Financial structuring: Catalyzing public and private sector finance	Prior to and with Figure 4 it might help to discuss sources of funds (debt, equity, gifts, grants), uses of funds (sector level mitigation or adaptation projects), and mechanisms by which they are connected (business models, PPPs, SPVs, etc.). It might help to broaden guarantees to the full family of risk management areas including reduction, sharing, and transfer.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree. Text added.
3. Financial structuring: Catalyzing public and private sector finance	deleted 'of': As noted in section 2.2, most cities lack access to long-term financing,	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
3. Financial structuring: Catalyzing public and private sector finance	Due to the large-volume and long-term needs in the transport sector, there is an increasing demand for financing concepts for sustainable mobility such as strengthening approaches such as "Fossil mobility financed switch to sustainable mobility/road financed rail". International climate funds are not sufficient here; instead, substantial impetus must be given to a climate-focused financial turnaround at national and local level.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Good point but too detailed for the overview Guide. Will be addressed in Annexes
3. Financial structuring: Catalyzing public and private sector finance	CDM, FI and ODA are referred in Figure 3 – should be in abbreviations.	GCF Secretariat	Notes added to table
3. Financial structuring: Catalyzing public and private sector finance	The Global Climate Finance Architecture flowchart (Figure 3, page 20) makes sense to me, although admittedly I cannot claim to be an expert in all facets of this process. The one suggestion that I have in this space is to find ways to increase capitalization of local resources. Yes, that is part of this whole process, but overall I see the climate finance model (as nearly every finance process) as one that is heavily tilted toward external infusion of funding or financing to buttress development. This is a significant barrier that is difficult to overcome, but I think sustainable urban development must be fortified with an increase of own source revenue to invest or re-invest in urban services that meet climate needs. Otherwise, cities at the lower end of the development spectrum will continue to languish.	USAID	Totally agree. National resources are key. See above on national financial institutions and the demand-side institutions described in the business models in Section 5.3. More detail in Annexes
3. Financial structuring: Catalyzing public and private sector finance	CDM, FI and ODA are referred in Figure 3 – should be in abbreviations.	GCF Secretariat	Repeat comment

3. Financial structuring: Catalyzing public and private sector finance	These explanations are very cursory, to the point of being unclear. For example, against the ESCO model, what does “different models” mean?	GCF Secretariat	The details for the business models set out in Section 3 are perforce brief. More detail in Annexes
3. Financial structuring: Catalyzing public and private sector finance	Should "SPSPf" be deleted? I am not sure what it refers to.	GCF Secretariat	Typo. Corrected
3. Financial structuring: Catalyzing public and private sector finance	Suggest deleting "in smaller cities"	GCF Secretariat	Sentence restructured
3. Financial structuring: Catalyzing public and private sector finance	Perhaps this documents provide guidance in terms of the standards it would expect?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	GCF will apply its Investment Framework and will require AEs to apply IFI standard safeguards as discussed in Section 7
3. Financial structuring: Catalyzing public and private sector finance	This guideline should reflect on better how GCF would support blended finance approaches	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	The issue is raised here but modalities of engagement are summarised in Section 5.3 and will be elaborated in Annexes
3. Financial structuring: Catalyzing public and private sector finance	Added words: and smaller	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	We have defined secondary cities to include "smaller"
3. Financial structuring: Catalyzing public and private sector finance	Not only the size and wealth of the city, but also its mandate provided by the national framework, i.e. what is a city actually allowed to do in terms of raising external finance? Also, even if a city has the mandate to i.e. access capital markets, the city also needs to have the capacities to do so. Plus, capacities are not necessarily linked to size and wealth of a city	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Think we have covered all of these issues in various parts of the document

3. Financial structuring: Catalyzing public and private sector finance	There is quite a strong focus on access to external funding here. While it is important to tap the potential of capital markets (both domestic and international) as well as private investments, it is important that projects the GCF will consider funding in the urban sector are more holistic: i.e. an urban adaptation / mitigation project seeking GCF funding i.e. as a guarantor to attract private investment, should also have components relating to the GCF investment criteria, in particular regarding multi-level governance aspects that improve the enabling frameworks for cities climate action	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree on the importance of national funding. To date IFI AEs have been pivotal in piloting modalities of urban climate finance with GCF but the detailed strategy for operations going forward will be detailed in an Annex and will focus on national AEs/ institutions and on adaptation
3.2	pg 24 discusses private sector projects in the GCF portfolio have a higher efficiency and the need to continue support the mobilisation of PS in this transition. Again, if there is a BreakOut Box of sorts about why the PS is important and the role that it can play, both as an enabler and as a consumer, in the LECR transition	Executive Director, Climate Markets & Investment Association	Would very much like to address this issue in more data but difficult in overview document and we lack data.
3.2	Table 5 is good as provides clear examples	Executive Director, Climate Markets & Investment Association	Thank you
3.2	There is lot of discussion of green bond issuance for investments in cities. The guidance should make it clear that the GCF is not in the "green bond issuance" business. There also has to be an acknowledgement that there are no uniform, and often no stringent criteria for the issuance of "green bond". In planning to support AEs with such approaches, the GCF has to be mindful of the reputational risk involved in potential "greenwashing" through such instruments.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Totally agree. Section 5.1 clarified.
3.2	Calculating the relative efficiency vs. leverage of the private vs. public sector urban projects is a fundamentally limited endeavor given the sample size and incredibly skepticism about the accuracy of mitigations estimates in the GCF, as expressed by the IEU as well as civil society observers, and noting that there are often inadequate baselines and processes in place to verify and report any anticipated emissions reductions during the course of the project. These numbers comparisons could simply be reifying a narrative baked into the estimates that the private sector believes it can achieve efficient reductions. To use these numbers as justification for prioritizing private sector models is not supportable; other reasoning should be used as evidence for this point.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Noted. GCF strategy issue in relation to formulation of Investment Framework.
3.2	Table 5 - Improving EE of building stocks: The described business model don't really capture the market e.g. ESCOs don't finance new buildings and most retrofits are financed by building owners. Pilot projects might not be a good way to promote a paradigm shift.	Climate Finance Associate, E2C2 at EBRD	On the contrary, the table explicitly references property development corporations.
3.2	Table 5 - Compact and Resilient Urban Development: "Financing ecosystem services" should also mention that often the benefits of these types of investments are less tangible and therefore difficult to monetise, whilst they serve a wider stakeholder group beyond the project developer and financier and deliver multiple co-benefits.	Climate Finance Associate, E2C2 at EBRD	Noted. This issue is taken up in Section 7.6. Table 5 is focused on the "bankability" of business models in focus sectors.

3.2	<p>"While larger cities may be able to directly access capital markets, other approaches will be needed for smaller cities. In partnership with its Accredited Entities, the GCF can support the bundling or aggregation of projects that, taken individually, would not be of sufficient size to interest private capital. Secondly for smaller cities it could help the fund that is financing a range of climate projects in smaller cities issue a green bond on the back of the aggregation of such projects."</p> <p>The guide describes very well the difference between the mega and secondary cities and acknowledges the difficulties secondary cities face, but apart from offering them support with project bundling, there is a clear preference for large cities with solid financial indicators and ability to access international finance.</p>	Head of Innovative Finance, ICLEI	Thank you
3.2	<p>The guideline as it stands under plays the significance and importance of non-market barriers in making a paradigm shift and achieving impact. In the introduction, the guideline begins to set out economic arguments to city problems in relation to market failures and the need for investment (The guidelines states that "Climate efforts in the urban space can also address market failures such as urban sprawl, congestion, and negative externalities"). These problems are not just a consequence of market failure but also a consequence of policy failures. This highlights the need for putting more emphasis on policy issues in their own right as a mean to lead to climate impact, rather than means to just lead to investments. The lack of emphasis on issues such as planning, institutional strengthening, capacity building continues to be under-represented in the drivers for the paradigm shifts, in the examples of interventions in each of the pathways and particularly in the role of the GCF and the financing structure examples the sector guidelines presents. In addition, the guidance states that "This situation presents an unprecedented investment opportunity for governments". However, we believe that policy interventions can also be at the center of a project proposal for a number of different reasons in addition to investments. Policy interventions can redirect finance through densification for instance, and they can bring behavior change. Both have significant impacts that are not contingent of new potential investments. The sector strategy almost exclusively focuses on loans, guarantee, equity and risk mitigation instruments very much in the context of income generating activities. Non-income generating activities that are also vital to remove barriers and can only be funded through grants are mainly limited to readiness and project preparation, which do not have the sufficient resource level to address them. It is our experience that policies, planning, institutional strengthening, technical assistance, capacity building and other non-market non-income generating activities are often the key cost-effective project activities to removing barriers.</p> <p>Recommendation: we believe that there remains a strong role for the GCF to fund projects with grants (not only through readiness and PPF) that will support non-income generating project interventions both upstream and downstream of investments and even in some cases independently of investments, and the SAP could fit as a good vehicle to deliver this work.</p>	UNEP	<p>These context issues are taken up in Section 4.2. In regards to the application of grants, the argument presented for grants is valid, but the critical issue for GCF is to maximise the impact of their use. The detailed financing strategy that would provide specific guidance on how such resource allocation decisions should be made would be technically and politically difficult to draft. Such a strategy would also have to take into account the fact that potential GCF partners also do grants (Partnership strategy in Annex).</p>
3.2	This is an important baseline that should be kept in developing further the pipeline.	Board Member	Agree.
3.2	Would it be possible to have a break down for Mega-Large vs. Secondary cities? It would be interesting also as regards urban context in most vulnerable countries, including LDCs and SIDS.	Board Member	<p>Agree this would be very interesting especially as regards sectoral investment priorities and needs, and financing capacities. Unfortunately there are no resources available to do this.</p>

3.2	Cross-cutting projects probably offer opportunities for better coordinated planning and more efficient management of low-emission and climate resilient transformational interventions in urban systems. It would be interesting to focus on assessing potential cross-cutting specific guidelines for projects in this results-area, which would probably have a potential to receive broader, more integrated support from blended finance instruments and thus strategically target additionality for GCF interventions.	Board Member	Agree. Will be addressed in Annex on financing strategy
3.2	We support it.	Board Member	Thank you
3.2	It could be interesting to assess potential financial models, for example, for smart power infrastructures, where the role of PPPs is key, with public providing bankable projects and funds through flexible financial mechanism (including guarantees) to crowd in private financing. It can be considered that, while business models should look at reducing upfront costs initially, smart power infrastructures offer long-term revenues opportunities from savings coming from reduced energy costs. This reasoning can broadly apply to both new build or retrofit projects, as partially highlighted here as well.	Board Member	Will address in general terms in Annex on financing strategy.
3.2	Even here, concessional funding should also consider that however potential savings in the long-run can come out from reduced energy costs in HVAC systems. Payback periods obviously depend on the type of equipment and other conditions, including local climate conditions. Broadly speaking, the higher efficiency levels have higher installed costs, but lower lifetime operating costs (see for example Montreal Protocol TEAP Task Force on Energy Efficiency Report (2018). Additionally, in actual practice, the prices of higher efficiency equipment have been found to decline over time in various markets as higher efficiency equipment begins to be produced at scale.	Board Member	Noted. Will address in Annex.
3.2	Some examples and analysis of possible financial models for the GCF to support adaptation measures and climate impacts resilient infrastructures are missing, i.e. in areas such as improvement of green urban infrastructure with increased use of nature-based solutions that could reduce flood and drought, enable water conservation, and reduce urban heat island effects. Once again, as said in our comment in chapter 2, we would be particularly interested to have possible examples of fit-to-context adaptive investments to respond to regional needs, i.e. in urban areas in LDCS and Africa.	Board Member	Adaptation issues now more clearly emphasised in ES and Sections 3.4, 4.1, 4.2, %1 and 5.3.
3. Financial structuring: Catalyzing public and private sector finance	After Figure 5 it might help to discuss the concept and process of impact investment (combined financial and social) as a means for blending, leveraging, and scale up.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree, but more relevant after Figure 4. Text amended
3. Financial structuring: Catalyzing public and private sector finance	The Agriculture Guide does not include GCF objectives. We should be consistent	GCF Secretariat	Editing issue
3. Financial structuring: Catalyzing public and private sector finance	If guides are going to include a paragraph on objectives, this could be copied and pasted.	GCF Secretariat	Editing issue

3. Financial structuring: Catalyzing public and private sector finance	1. What is the adaptation impact? 2. Does this include the mitigation element of cross-cutting projects?	GCF Secretariat	Data currently not available from current GCF portfolio systems.
3. Financial structuring: Catalyzing public and private sector finance	Examples?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	There is a table of all projects given in the relevant Annex
3. Financial structuring: Catalyzing public and private sector finance	Again, the Guide could provide useful guidance in terms of whether this is the type of cross-cutting project that would fit well in the GCF's infrastructure/urban portfolio?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	The issue is that GCF should encourage projects and financing mechanisms that are flexible enough to finance projects promoted by a variety of institutions if they are measure up to the Investment Framework. The strategy set out in the Annex will elaborate
3. Financial structuring: Catalyzing public and private sector finance	This is the most relevant section of the whole guide and should be elaborated much more, including how FPs should aim to do this, how they can bring in more private finance (at a later stage), how they aim to make the project sustainable, what indicators to use, standards for MRV, etc.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. This section is based on an extensive market scan set out in an Annex. The detailed strategies responding to this scan will also be set out in the Annexes, but space only allows for a summary of the approach in Section 5.3
3. Financial structuring: Catalyzing public and private sector finance	The chapter of the value added of the GCF in the urban sector should be extended and refined. The cooperation and coordination with other urban initiatives and funds is missing.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	As above, but the partnership strategy is set out in general terms in Section 4.3 and will be elaborated in an Annex
3. Financial structuring: Catalyzing public and private sector finance	We would like to see more of this in FPs ut developers need to know how to demonstrate this and how important it is	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Good point. Added to Section 7.4
3. Financial structuring: Catalyzing public and private sector finance	Should this be "et al"?	GCF Secretariat	Yes. Corrected

3. Financial structuring: Catalyzing public and private sector finance	Where does the GCF stand within the existing climate finance architecture? Where is the comparative advantage of the GCF compared to existing financial and development institutions? The proposed mapping in figure 6 would need to be substantiated.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	As above, the mapping set out in the figure is based on an extensive market scan set out in an Annex. The "comparative advantage" of GCF is summarised by the Urban Action Areas and will be detailed in the Annexes
3. Financial structuring: Catalyzing public and private sector finance	We look forward to further cooperation between the Climate Investment Fund (CIF) and the GCF, notably on knowledge management. The GCF is a permanent observer in the CIF and has regular exchanges between the CIF Administrative Unit and the GCF Executive. It is of course desirable that this cooperation continues. One can identify complementarities between the GCF which is willing to address mega/large cities and the CIF Climate Smart Urbanization Program which will rather focus on secondary cities and which has a strong programmatic approach (including diagnostics, improvement of framework conditions, planning and project preparation, actual investment and mobilization of public and private co-financing).	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Agree. The partnership strategy setting out the proposed collaboration between GCF and other institutions in the sector will be detailed in an Annex
3. Financial structuring: Catalyzing public and private sector finance	Before Table 5 it might help to discuss how revenue streams can be documented and expanded through GCF projects in order to attract commercial financing and then combined with social impact analysis to attract concessional funds as needed for leveraging.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree with the point. However, GCF's portfolio is not yet large enough to generate anything but case studies. To obtain useful generalisations in respect of both city financing and cashflows of PSP business models will require a) effective partnerships structured to share such data and b) inclusion of MRV systems in GCF projects that yield such data. These issues are included within strategies to be elaborated in Annexes
3. Financial structuring: Catalyzing public and private sector finance	These headings should match page 12	GCF Secretariat	Amended.
3. Financial structuring: Catalyzing public and private sector finance	Suggest "either" Suggest adding commas: "buildings, or off-site, as can"	GCF Secretariat	Ok. Amended Ok. Amended
3. Financial structuring: Catalyzing public and private sector finance	"Suggest "either" Suggest adding commas: "buildings, or off-site, as can""	GCF Secretariat	Ok. Amended

3. Financial structuring: Catalyzing public and private sector finance	Should be "relating to"	GCF Secretariat	Table revised detail now in Annex, but revised therein
3. Financial structuring: Catalyzing public and private sector finance	Something is missing here	GCF Secretariat	Thanks. Amended
3. Financial structuring: Catalyzing public and private sector finance	Not the GCF?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Can be GCF contributing to a fund at NDB
3. Financial structuring: Catalyzing public and private sector finance	HVAC not mentioned in earlier building discussion.	US Department of State	Will mainly be addressed in EE Guide - see footnote 13 - but such investments are often included in a "green building"
3. Financial structuring: Catalyzing public and private sector finance	How can the GCF contribute and under what circumstances? Large scale investments can be financed a similar way – also with GCF contributions?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	GCF can contribute to a fund such as SGDF (see Section 6.1) at an NDB provided its Investment Framework is applied
3. Financial structuring: Catalyzing public and private sector finance	Would the GCF offer one?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Yes. It has done so in the Energy Sector in Vietnam - see Section 6.3
3. Financial structuring: Catalyzing public and private sector finance	Meaning the GCF would not provide grants in these cases?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. GCF can provide any or all of grants, guarantees or concessional loans as justified by the FP
3. Financial structuring: Catalyzing public and private sector finance	Again, not the GCF?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	As above

3. Financial structuring: Catalyzing public and private sector finance	Again, from the GCF?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	As above
3. Financial structuring: Catalyzing public and private sector finance	Thus requiring GCF grants...?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	As above
3. Financial structuring: Catalyzing public and private sector finance	Would the GCF have such a requirement?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. But the GCF needs to foster such upscaled/ programmatic approaches. See Section 6.1 for SGDF example
3. Financial structuring: Catalyzing public and private sector finance	Confusing and only somewhat relevant – the GCF would usually provide loans in these cases? They would also consider using guarantees? "borrow from dedicated funds" and submit an FP to the GCF?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	As above, GCF can provide any or all of grants, guarantees or concessional loans as justified by the FP Dedicated sector funds such as transport funds are common at NDBs and, with a climate focus, can be eligible for GCF financing.
3. Financial structuring: Catalyzing public and private sector finance	From the GCF?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	As above
3. Financial structuring: Catalyzing public and private sector finance	It should be made clear at beginning of this box that the two – urban form and transport system – should be thought together from the beginning, hence also in business models. The current separation is damaging, at least hindering integration...	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended
3. Financial structuring: Catalyzing public and private sector finance	Add: "Financing right-of-way improvement and facilities, such as footpaths and cycleways, for NMT usually ..."	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended

3. Financial structuring: Catalyzing public and private sector finance	Paragraph Copied here from below: Following the Avoid-Shift-Improve (ASI) paradigm, this should start here/ move this up. Lower cost/higher impact than e.g. upgrading vehicle efficiency System efficiency > mode efficiency > vehicle efficiency	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
3. Financial structuring: Catalyzing public and private sector finance	Delete: "Financing right-of-way improvement and facilities, such as footpaths and cycleways, for NMT usually	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended but cut down to avoid duplication with Transport Guide.
3. Financial structuring: Catalyzing public and private sector finance	Add: and the manufacture and distribution of products made from recycled materials as well as alternative and innovative business models..	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
3. Financial structuring: Catalyzing public and private sector finance	Furthermore, the privatisation of selected waste streams, especially of various packages could be an option to lessen burdens on municipalities , likewise creating opportunities for the private sector to contribute through EPR systems. Please also see: EPR Toolbox for stakeholders in developing and emerging countries (PREVENT Waste Alliance, 2020) EPR: Updated Guidance for Efficient Waste Management (OECD, 2016)	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Text added
3. Financial structuring: Catalyzing public and private sector finance	The proposed list of financial instruments needed to boost low carbon and and climate resilient pathways in the urban sector is comprehensive. It is however very difficult through this table to identify where does the GCF stands within the existing climate finance architecture. See comments above on complementarity.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Amended to clarify GCF support in the text above table
3. Financial structuring: Catalyzing public and private sector finance	GCF can hardly provide all type of financial instruments and project preparation TA needs to support the paradigm shift pathways for the urban sector as described in this table. GCF would need to set priorities. See comments above on complementarity.	Advisor to Board Member Jan Wahlberg. Ministry of Foreign Affairs, Finland	Agree. Partnership strategy is vital and needs to be seen in the context of GCF strategy priorities based on the market scan - see Annexes
4	Great to read about these case studies	Executive Director, Climate Markets & Investment Association	Thank you
4	One result of this approach, reflected in the country case studies provided in the guidelines, is that most of this finance is channeled through funds and facilities, which, as CSOs have mentioned before, make it impossible to assess, ex ante, the projects that will be financed with GCF funding, and their impacts, both positive and negative.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Agree these facilities need to be monitored closely to ensure quality projects and impact.

4	<p>WRI could serve as a valuable resource that should be consulted in future versions of the guide (https://wri.org/cities), in particular its prize for cities, https://prizeforcities.org/, which highlights several examples that are integrated, human-rights centered approaches to transforming urban landscapes in the context of climate change. It is critical that the final guide showcase more than the financing facilities for multi-city funding, critiqued below, but well-designed, singular cities projects similar to these, which could be submitted to the GCF as SAPs for smaller or emerging urban areas to large projects for large cities. See, as one example, this particular project reaching 5 million beneficiaries, while centering and valuing women's leadership in their model: https://prizeforcities.org/project/womens-action-towards-climate-resilience. Considering the content of these exemplar projects as well as the potential for DAE submission rather than IAE, or grant-based funding such as would be appropriate for informal settlements, should reframe this entire section. The inclusion of appropriate case studies should outweigh whether or not such case studies are in the GCF portfolio.</p>	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Agree. Will be referenced in Partnership strategy in Annex.
4	<p>While there is skepticism surrounding these selection of case studies (see adjacent comments), the EBRD one is particularly inappropriate, in part because that is the one about which civil society has the most information on implementation (though not through GCF disclosure). The key problems of the EBRD case study exemplify the concerns and difficulties with top-down, programmatic approaches to this sector. First, there is no information on implementation publicly available for the three GCF case studies as these projects/programmes are early in their implementation/not yet implemented (no annual performance reports available), and thus any example is based solely on the project proposal. For some projects, the detailed project plan as presented in the proposal may have important elements to uphold as a potential case study, but in the case of programmatic approaches, there is not information on the actual subprojects to be implemented. For this EBRD project, under implementation for over 500 days at the time of writing, no subprojects have been disclosed, so from a practical standpoint its case study status is suspect due to vague information about what the EBRD programme will look like in actual urban systems, and from an integrity standpoint, using such a poor example of information disclosure suggests that information disclosure is not prioritized as it should be (as right to access to information is a human right; see overarching comments). Indeed, what is known of this GCF programme is because of an existing EBRD programme and the diligent advocacy and analysis of civil society. The work of Bankwatch Network highlights a series of issues with transparency and information disclosure, stakeholder engagement, gender inclusivity, and alignment with climate adaptation and mitigation goals. See https://bankwatch.org/publication/the-ebrd-and-eib-s-sustainable-municipal-infrastructure-investments-in-the-western-balkans-and-eastern-neighbourhood, https://bankwatch.org/publication/green-city-action-plan-for-tbilisi-a-mere-formality, https://bankwatch.org/blog/cities-for-citizens, https://bankwatch.org/blog/informing-women-is-the-first-step-to-empowering-them, and https://bankwatch.org/blog/a-walk-on-the-wild-side</p>	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Noted
4. Country Case Studies	<p>In addition to case studies it would help to provide a general, systematic methodology for financing low carbon and or resilient projects that are tailored to country, sector, objectives, using best available practices and tools. Each case deploys some combination, but a general framework would provide guidance as well as the capacity to innovate beyond off the shelf approaches, which are unnecessarily limiting at this time. Also, cases could cut across specific sectors and regions for mitigation and adaptation to support application of the methodology. Risk management (a.k.a. de risking) cases also need to be featured.</p>	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree. BUT not in overview Guide where cases only have a few pages. Will develop further in detail Strategy in Annex

4. Country Case Studies	Consider addressing the GCF six investment criteria when presenting the examples. This can provide an illustrative example of the types of projects GCF approves and the criteria these projects fulfilled.	GCF Secretariat	Would be good but again insufficient space
4. Country Case Studies	Should delete "both" Should delete "of"	GCF Secretariat	Amended
4. Country Case Studies	Suggest "by a" Should be of \$ 320m "or" of approximately \$300m Should be "7"	GCF Secretariat	Amended
4. Country Case Studies	The title of FP086 is "Green Cities Facility"; shouldn't we use that here?	GCF Secretariat	Amended
4. Country Case Studies	-Should be "\$75m GCF guarantee" -Should be "11.3"Should be IBR -Should be IBRD	GCF Secretariat	Amended
4. Country Case Studies	This does not match the financing on the website. According to that, the facility amounts to USD 302.5m, supported by a USD 76m loan and USD 25.7m grant from GCF, as well as cofinancing of USD 155.6m in loans and USD 45.2m in grants.	GCF Secretariat	Amended
4. Country Case Studies	To be used as best practice or a benchmark, or another way?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
4. Country Case Studies	Shandong is a province not a "just" a city. We recommend that in key points throughout this document the focus on cities should probably be complemented with a reference to other subnational entities such as regions and provinces.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	True, but all the investments under the fund are urban-related - either urban infrastructure or urban enterprises. It was processed by urban specialists in ADB
4. Country Case Studies	First time this is mentioned. How they do this would be highly relevant.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. This is why it is a case study. A broader strategy on facilities will be included in the operational strategy in an Annex
4. Country Case Studies	How does this project example (target group industrial enterprises) fit the scope of the cities, buildings, urban systems sectoral guide?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Most of the investments relate to the energy needs of cities - a good example of the use of guarantees

5	We appreciate the reference to the Rapid City Appraisal methodology	Executive Director, Climate Markets & Investment Association	Thank you but have amended to provide a more accessible reference
5	Though unfamiliar with the Rapid City Appraisal Methodology, it is unclear here how stakeholder engagement is taking place across these four stages. This process should not be cited if it reinforces a top-down approach to city planning.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Agree. While it is not possible to detail the processes of stakeholder involvement in an overview document, stakeholder consultation is important and has been reinforced in Sections 4, 5 and 7.
5	This, page 33, is the first mention of "gender", couched in the assumption that the required gender assessment is enough to ensure gender is integrated in cities projects. In fact, AEs must design projects with stakeholder engagement, including women's groups and with attention to vulnerable groups, and gender must not be an after-the-fact approach or focused in only one document. Neither the gender assessment nor the gender action plan is the only place where gender should be addressed. By simply describing the gender requirements of the GCF, this guide is in fact undermining the entire purpose of the Gender Policy and GCF gender guidance, such as provided through the publication Mainstreaming Gender in GCF projects.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Approaches to community consultation including gender is now also in Section 5 and the reference to gender policy in Section 7 is strengthened by inclusion of references to the document cited.
5	"Needs of Recipient: Critical to the proposal will be an assessment of the rationale for the specific type and quantum of financing required based on a review of gaps in the existing financing mechanisms applicable to the sector and on the needs of the beneficiaries. Vulnerability levels", There should also be a section to consider helping the marginalised people of lower income groups, indigenous peoples or communities who are fighting against unsustainable, carbon-intensive, non-climate resilient development projects that are driven by big developers with a lot of money. For example, there are various land reclamation projects happening in Southeast Asia that will destroy natural ecosystems that are important resources on which people rely, but such projects are pushed by influential conglomerates of developers who then market these projects as 'green and smart cities'. This form of power imbalance is quite pervasive and often not taken into consideration when evaluating "vulnerability".	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Feel this is beyond the scope and capacity of the GCF.
5	This section on sustainable development potential is where the age component can be added as an analysis; health is included but fairly limited. This is a new resource for age and health-friendly cities with tools for assessment included; noting the importance of cities that are developed to support differentiated needs in age and ability. This could be a useful guide for project guidance/initial assessment and processes to put in place. Though not explicitly noted, environmental injustice/racism and location of where cities place things so that whole planning piece needs to be integrated. https://development.asia/explainer/how-develop-healthy-and-age-friendly-city	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Non-economic issues are now more explicitly added in the discussion of analysis in Section 7.

5	This reference to education and capacity building on sustainable building supplies and methods in the context of gender needs to be expanded with an emphasis on youth and capacitating the next generation with knowledge and skills for urban environment planning and building.	As an individual, Women's Environment and Development Organization/GCF observer network, but this submission is a joint submission on behalf of a group of CSO and Indigenous Peoples Organizations	Will add youth issues into the Partnership strategy in Annex.
5	It may be good to add some information on climate rationale, impact assessment and result management.	Office of Portfolio Management GCF Secretariat	This could be addressed in an Annex if not covered in more general GCF documentation.
5	The case studies (chapter 4) described various programmatic project development facility examples to develop bankable project pipelines in various countries (such as ADB's Shandong Green Development Fund, EBRD's Green Cities Facility, and the C40 Cities Finance Facility). While the showcased facilities are proving to be effective in generating more bankable LECR projects, it appears that the GCF's direct involvement in setting them up (particularly in the urban arena) has been limited to co-financing of those project development facilities and providing guarantees (page 29-30). Suggest the Guide explore/review different modalities for setting up expanded project development facilities that tap the experience of local/national entities accredited by the GCF as financing conduits (particularly local development banks), as well as networks of urban planning professionals and their associations, should be further explored in the guide.	Asian Development Bank	Agree that NDBs etc have to have a stronger role in GCF processes. Building capacity for this will have to be a major focus of the Partnership strategy annex as GCF has VERY limited resources for this purpose.
5	See proposed revised text: ADB's Shandong Green Development Fund (SGDF) Project in the People's Republic of China as an example of a programmatic facility leveraging PIC finance The project establishes an innovative, replicable and scalable form of financing mechanism that will leverage Private, Institutional and Commercial (PIC) finance for a pipeline of viable climate resilient and low emission investments. The SGDF will do this by: (i) ensuring that it addresses priority climate impacts and vulnerabilities in Shandong Province, the People's Republic of China through incorporating these priorities into its portfolio objectives; (ii) incorporating a capacity development program to develop a pipeline of sustainable and replicable sub-projects based on high-level performance against the SGDF Green Climate Assessment Guidelines based on the GCF Investment Criteria; and (iii) incorporating structures for crowding in PIC finance. Private financing will be leveraged at both fund and project levels. The \$1.5 b SGDF is supported by \$400m financing from international financial institutions including ADB loan of \$100m, GCF loan of \$100m, and other co-financing of \$200m; \$360m from public sources; and PIC finance of approximately \$740m. Figure 7 below shows the structure of the Fund.	Asian Development Bank	Noted. But the suggested text does not fully reflect the design principles of the SGDF.
5	We propose making gender inclusion a cross-cutting theme in the Strategy and establishing more rigorous policy requirements related to gender issues, in particular women participation, gender rights protection and safeguards, such as gender-based violence and harassment (GBVH) requirements.	CEE Bankwatch Network	Noted. Gender augmented as set out in Row 9 above. More general gender assessments need to be addressed as part of a GCF-wide policy.
5	Establishing clear transparency and stakeholder engagement criteria would help to meaningfully engage citizens in shaping green solutions for cities that would serve their needs and will make them active participants in developing their cities while ensuring sustainability and cohesion in the cities development.	CEE Bankwatch Network	Agree. Text added.

5	<p>Impact potential - Adaptation core indicator: as commented in the context of consultation on GCF's proposed Integrated Results Management Framework, suggest revising the adaptation core indicator to reflect the Climate Resilience Outcomes that the investment delivers, as a way of monitoring the impact of investments. The following references could be suggested: MDB/IDFC work on Framework and Principles for Climate Resilience Metrics (https://www.ebrd.com/documents/climate-finance/a-framework-for-climate-resilience-metrics-in-financing-operations.pdf); EBRD's climate resilience outcomes based approach to climate adaptation finance as part of EBRD Green Economy Transition GET approach (https://www.ebrd.com/cs/Satellite?c=Content&cid=1395250280926&pagename=EBRD%2FContent%2FDownloadDocument)</p>	Climate Finance Associate, E2C2 at EBRD	Needs to be addressed at the level of (the design of) the Investment Framework.
5	<p>Impact Potential: We believe it is useful to mention and include in the sector guidance the applicable Project/Program level Outcomes for Mitigation and Adaptation.</p> <p>Recommendation: add specifically the indicators 5.0: Strengthened institutional and regulatory systems for low-emission planning and development</p> <p>5.1 Institutional and regulatory systems that improve incentives for low-emission planning and development and their effective implementation and 5.2 Number and level of effective coordination mechanisms.</p>	UNEP	Agree. Text added.
5	<p>The Simplified Approval Process (SAP) for Cities and Climate Change does not feature strongly in the Cities, Buildings and Urban Systems Sectoral Guide, while we understand that the Sectoral Guide does guide the SAP. Furthermore an evaluation has been completed on the SAP, yet recommendations are not included in the Sectoral Guide. One recommendation of the evaluation suggests that a separate strategy should be developed for the SAP</p> <p>Recommendation: it would be beneficial to have a separate section in this Sectoral Guide that is dedicated to the SAP. Some of the recommendations we have made above could be brought to the SAP section, particularly those related to the importance of addressing non-market barriers, such as policy, planning, institutional and capacity building for climate investments and impacts. To further strengthen this direction of thinking we think it is important to include appropriate project and programme level indicators responding to SAP related actions areas such as:</p> <ul style="list-style-type: none"> - Number and level of effective coordination mechanisms - Percentage increase in green space - Percentage increase in the number of people walking - Percentage increase in public transport routes <p>We also note the SAP on Cities and Climate Change includes other technologies not mentioned in the sector strategy including street lighting.</p>	UNEP	The SAP still requires the proponent address the elements of the Investment Framework. If additional indicators are required specifically for the SAP process in urban then they can be added in an Annex.
5	Is there a currently used framework that could be an example for the assessment process?	Board Member	The Investment Framework?

5. Guidance for developing impactful GCF urban projects.	<p>"The 4 stages of appraisal cited from the Rapid City Appraisal will be familiar to most urban mitigation planners. Stage 4 ("Program and project preliminary costing, financing and investment analysis") takes a big step from planning into the ultimate prioritized portfolio of "bankable" projects. The guidance would greatly benefit from one or more examples (case studies) that provide the details on how this was accomplished. For example, the data underlying much of the early Stage planning efforts will likely be insufficient to support the Stage 4 analyses. In the case of building energy efficiency for example, building energy data (from either the local utility or gathered via survey) will be needed. In addition, some bench-marking of building energy use at the end use level (lighting, HVAC, etc) will be needed, along with assessments of retrofit technologies and their costs (much of this should be supported by local surveys).</p> <p>The addition of case studies of the above and how they map into the GCF investment criteria are needed."</p>	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	This is very insightful. Support for moving from planning to detailed project concept to PFS level detail is scarce. GCF has the capacity to do some of this through Readiness and PPF but nowhere near enough. It is thus essential to partner with such facilities as the Gap Fund. This will be detailed in the Partnership strategy in an Annex as there is no space in the overview Guide
5. Guidance for developing impactful GCF urban projects.	Under the adaptation core indicator It might help to clarify that risk = exposure times magnitude, and that vulnerability = risk minus adaptive capacity as a means for targeting high impact adaptation actions. Note that exposure can include both human and non human populations and it, as well as magnitude, can be acute or chronic.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Point taken, But don't know how you would quantify that. There are established methods of quantifying adaptation benefit - see EBRD's methodology - but they are too data intensive for EMDCs. Footnote to this effect added. Also the Investment Framework defines adaptation benefit in terms of people benefiting. Take it up with the Board.
5. Guidance for developing impactful GCF urban projects.	Under Scaling Up and Replication It might help to discuss the need to move beyond single projects to program level changes through standardization and aggregation.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Good point. Added
5. Guidance for developing impactful GCF urban projects.	Under Innovation, it might help to note that some solutions have low needs for technical innovation at present and high needs for management and or market innovation in order to be impactful. Much of low carbon technology is in this bracket.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree. Text included

5. Guidance for developing impactful GCF urban projects.	Under Knowledge and Learning it might help to note that best practices and technologies databases can be improved in content and distribution	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree. Text included
5. Guidance for developing impactful GCF urban projects.	Under Economic Co-Benefits note that economic design and planning skills are essential in addition to analysis	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree. Amended
5. Guidance for developing impactful GCF urban projects.	Under Social Co-Benefits it would help to build capacity for baseline assessments that must preceded net or beyond baseline measurement of impacts; too many projects lack this and use a checkoff system or simply presume impacts through theory.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree. Text included
5. Guidance for developing impactful GCF urban projects.	Under justification for financing, it would help to highlight the role of risk at the macro and micro levels as part of this since it is often the first barrier to financing, but lack of basic knowledge in the financial world regards climate solutions is another.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Agree. Amended
5. Guidance for developing impactful GCF urban projects.	Under Stakeholder Engagement Process it might help to set expectations about effective procedures, timelines, and levels of effort since they are often underestimated	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	This differs greatly among countries and city circumstances. IFIs and some national AEs have policies and systems for this and GCF requires their use

5. Guidance for developing impactful GCF urban projects.	Under Efficiency and Effectiveness, for both financial and social cost benefit analysis it might help to note that Net Present Value analysis is a critical first step, and also that Cost Effectiveness analysis and other tools can be used if benefits are difficult to quantify or monetize -- this allows comparison of investment alternatives that include both financial and social impacts	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Thanks. Calculation of the EIRR and FIRR implies the use of CBA/ DCF analysis. According to IFI guidelines, cost effectiveness can be used in place of ECBA given the ability to undertake rigorous analysis of alternatives which may not be possible. But footnote added on this.
5. Guidance for developing impactful GCF urban projects.	Under Assumptions and Risks it might help to note and address the issue of macro risks such as inflation, currency, and lack of contract law in addition to project level risks.	Program Officer; Winrock's Authorized Representative to the GCF Winrock Consortium (consisting of Winrock International, Center for Climate Strategies, and Climate Law and Policy)	Good point. Amended
5. Guidance for developing impactful GCF urban projects.	The Agriculture Guide presents this section as an overview of GCF investment criteria. Should that approach be used here, for consistency?	GCF Secretariat	GCF's Investment Criteria constitute the headings of this Section and each sub-section sets out how they can be addressed..
5. Guidance for developing impactful GCF urban projects.	Is it worth adding a reference? – e.g. https://www.adb.org/documents/tool-kit-economic-assessment-planning-development-cities-asia	GCF Secretariat	Agree. Thanks. Reference added
5. Guidance for developing impactful GCF urban projects.	Is there a hyperlink we can add to the document referenced in the footnote?	GCF Secretariat	Editing issue
5. Guidance for developing impactful GCF urban projects.	Sustainable land management and restoration of degraded production landscapes in the rural-urban interface should also be assessed.		Yes, but this is a specific instance of an investment that would have x number of adaptation beneficiaries and perhaps some GHG savings which would be documented under the Impact criterion (Section 7.1)
5. Guidance for developing impactful GCF urban projects.	Support should also be provided to integrate biodiversity and ecosystem values in urban planning. Support should be provided to safeguard threatened wildlife species and habitats affected by urbanization.		This would be documented under environmental cobenefits Section 7.3
5. Guidance for developing impactful GCF urban projects.	Close collaboration should also be contemplated with the Global Environment Facility (GEF) and the Global Platform for Sustainable Cities (GPSC) (World Bank). GEF has established the Sustainable Cities Integrated Approach Pilot (SC IAP) where participating cities can access knowledge and expertise in sustainable urban planning, and exchange ideas and experiences.		Agree. To be addressed in partnership strategy in Annex

5. Guidance for developing impactful GCF urban projects.	Impact potential - Adaptation core indicator. While acknowledging the total number of direct and indirect beneficiaries expected to be impacted as a relevant indicator, it should be noted that this is more often than not difficult to estimate with an acceptable level of confidence. While the estimation of the climate mitigation potential of a certain action is quite straight-forward, in terms of adaptation this is not the case. The level of resilience of a city and its residents can vary from type of disaster the city is subjected to, moment in time such event manifests, cumulative effects, baseline level of vulnerability, awareness level at given time, etc. Guidance / simple methodology to estimate the number of direct and indirect beneficiaries would be beneficial for ensuring desired level of accuracy is met.	RWA Group SCE, Green Partners Ltd.	Agree. But this is a more general issue for GCF. Included in Programming Manual? DRAZEN?
5. Guidance for developing impactful GCF urban projects.	This should include data on capacity development/people trained over time period xyz with results xyz etc.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended
Section 5. Guidance for developing impactful GCF urban projects.	Successful project implementation will also depend on strong ownership by local municipal leaders and governments. The GCF could consider requiring a specific endorsement letter by local governments.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended
5. Guidance for developing impactful GCF urban projects.	Add: "or building networks such as the Global Alliance for Buildings and Construction"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	This issue is a partnership strategy priority - the first priority is building partnerships with networks having an urban finance focus, but after that partnerships with sector and thematic networks with an urban focus are important - to be detailed in Annex
5. Guidance for developing impactful GCF urban projects.	Add: "for example"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended
5. Guidance for developing impactful GCF urban projects.	Add: "an related costs"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended

5. Guidance for developing impactful GCF urban projects.	This seems important as highlighted throughout the doc. In the exec sum, "market imperfections" are briefly mentioned and not mentioned again – this would be a good place to discuss how market imperfections can be overcome and how GCF financial instruments could be used, including through the readiness programme and TA.	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended
5. Guidance for developing impactful GCF urban projects.	Add: "for example showcasing systemic changes achieved by policy reforms and capacity gains as well as"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Text added
5. Guidance for developing impactful GCF urban projects.	Add: ", where relevant,"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Think we have covered this with "for example"
5. Guidance for developing impactful GCF urban projects.	Why bilateral agencies? Do you mean bilateral technical assistance agencies. If so, why? Wouldn't a comment on the need for collaboration rather be of a general nature for any area/activity and relate more in general to an alignment and collaboration with the "landscape" of related projects, programs and support offers?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	GCF needs to partner with other agencies with resources and objectives that align with GCF's priorities. Some bilateral agencies fit this requirement. A partnership strategy will need to be more specific on which bilateral agencies and other entities that fit its needs
5. Guidance for developing impactful GCF urban projects.	The importance of cooperation between levels of government (local and state/national) could be elaborated upon, as conceptualized in multi-level governance/vertical integration/collaborative climate action – see for example "Recover green: Higher NDC-Ambition through Collaborative Climate Action" (GIZ 2020).	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Text added
5. Guidance for developing impactful GCF urban projects.	Add "Technical assistance integrated into projects can finance for example political and technical advisory services, capacity development measures, analysis and communication measures, networking etc."	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Amended
5. Guidance for developing impactful GCF urban projects.	Should this be a new bullet?	GCF Secretariat	No. This is a social issue albeit an important one.

5. Guidance for developing impactful GCF urban projects.	Replace: "E" with "Socio-" Add: "e"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. Granted what we normally call Economic CBA was originally the Little-Miralees Social CBA Guidelines but this term has evolved to mean CBA that includes the weighting of beneficiaries - which we do not do.
5. Guidance for developing impactful GCF urban projects.	Add: "socio-"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	As above
5. Guidance for developing impactful GCF urban projects.	Add: "cleaner air and water,	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Think these are covered by "etc."
5. Guidance for developing impactful GCF urban projects.	Add: "and political/societal participation; improved access to economic activity and markets"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Think these are covered by "include"
5. Guidance for developing impactful GCF urban projects.	Add: "mentioned above" Replace: " increased community involvement and education; limits negative health impacts and promote safety"	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	No. Prefer existing formulation.
5. Guidance for developing impactful GCF urban projects.	More specification needed. AEs should include in their proposals how TA would be properly integrated and designed in a way that beneficiaries get practical information. What does community outreach mean in the urban context, which communities?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Not appropriate/ possible in overview Guide. Will try to address in Annexes.
5. Guidance for developing impactful GCF urban projects.	Remittances and informal financing mechanisms are a common feature in many cities in the developing world. Should we include a reference to these here, or elsewhere in the document?	GCF Secretariat	Community-based financing is mentioned in Section 5.1. But point taken these flows are important. Will consider how to integrate in financing mechanisms to be detailed in Annexes.

5. Guidance for developing impactful GCF urban projects.	Needs to be elaborated or the same problem will arise; this sentence often emerges in FPs with no, or little, supporting evidence	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Text added
5. Guidance for developing impactful GCF urban projects.	The importance of cooperation between levels of government (local and state/national) could be elaborated upon, as conceptualized in multi-level governance/vertical integration/collaborative climate action – see for example “Recover green: Higher NDC-Ambition through Collaborative Climate Action” (GIZ 2020).	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Agree. Amended in relation to barriers and elsewhere in the document as set out above and included in this section under “alignment”
5. Guidance for developing impactful GCF urban projects.	The importance of cooperation between levels of government (local and state/national) could be elaborated upon, as conceptualized in multi-level governance/vertical integration/collaborative climate action – see for example “Recover green: Higher NDC-Ambition through Collaborative Climate Action” (GIZ 2020).	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	As above
5. Guidance for developing impactful GCF urban projects.	Suggest adding commas: “reductions), and for adaptation, the” If these are not added, the comma after “mitigation” should be deleted. Suggest “The efficiency of the intervention should be assessed and benchmarked against relevant comparators.”	GCF Secretariat	Agree. Amended
5. Guidance for developing impactful GCF urban projects.	Suggest a slight change: “the assessment of: financial viability; the appropriateness (need for) of using concessional funds; and how the proposed financial structure”	GCF Secretariat	Agree. Amended
5. Guidance for developing impactful GCF urban projects.	More explanation needed on types of assumptions and risks	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Text added but space constrained in overview Guide
5. Guidance for developing impactful GCF urban projects.	This is a bit confusing. What is the function of the Sectoral guide, and what is the function of the Programming Manual? Where do they overlap?	Advisor to Board Member (BM) Heike Henn, Germany- The Federal Ministry for Economic Cooperation and Development (BMZ), Germany	Editing issue
5. Guidance for developing impactful GCF urban projects.	Something missing here	GCF Secretariat	Editing issue