



Complementarity and coherence among climate funds

A tool for improved access in
LDCs and SIDS?

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Accessing climate finance remains slow, complex and resource intensive, with disproportionate burdens on Least Developed Countries (LDCs) and Small Island Developing States (SIDS). In response, the Green Climate Fund, Global Environment Facility, Adaptation Fund and other major climate funds are advancing an agenda of ‘complementarity and coherence’ aimed at enhancing access for countries, better aligning their operations and reducing duplication. This paper traces how complementarity and coherence has evolved through United Nations Framework Convention on Climate Change guidance and fund-level implementation. Drawing on document analysis and interviews, it examines whether these efforts are translating into meaningful improvements in access for LDCs and SIDS or risk introducing new forms of complexity.

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Abbreviations

AF	Adaptation Fund
AF-TERG	Technical Evaluation Reference Group of the Adaptation Fund
CIF	Climate Investment Funds
CMA	Conference of the Parties serving as the meeting of the Parties to the Paris Agreement
CMP	Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol
COP	Conference of the Parties to the UNFCCC
DAE	Direct access entity
FRLD	Fund for Responding to Loss and Damage
GCF	Green Climate Fund
GEF	Global Environment Facility
LDC	Least Developed Country
LEG	Least Developed Countries Expert Group
LIFE-AR	LDC Initiative for Effective Adaptation and Resilience
LTV	Long-Term Vision on Complementarity, Coherence and Collaboration
MCF	Multilateral climate fund
MDB	Multilateral development bank
NAP	National Adaptation Plan
NCQG	New Collective Quantified Goal on Climate Finance
NDA	National designated authorities
NDCs	Nationally Determined Contributions
NIE	National implementing entity
SCF	Standing Committee on Finance
SIDS	Small Island Developing States
UNFCCC	United Nations Framework Convention on Climate Change

Summary

‘Complementarity and coherence’ is increasingly presented as a practical fix for a fragmented and insufficient climate finance system. Major funds are being urged to work together so countries can access support with fewer duplicative steps, clearer pathways and lower transaction costs. As a result, it is also a policy to ostensibly expand the finance available to fund projects with partner countries. This paper finds that fund-level complementarity and coherence initiatives have become more explicit and formalised over the years, in accordance with the maturing guidance from the Conference of the Parties (COP) to the United Nations Framework Convention on Climate Change (UNFCCC), yet the benefits of these initiatives for Least Developed Countries (LDCs) and Small Island Developing States (SIDS) remain disjointed.

The climate finance landscape is extraordinarily complex, with multiple funds and flows, each governed by their unique mandate and operating with their own business model. For LDCs and SIDS, this fragmentation is a major access barrier, creating overlapping processes, mismatched timelines and high transaction costs. To tackle this complexity, climate funds have ramped up coordination efforts including issuing joint statements, drafting action plans and forming technical working groups. Some fund agendas have highlighted private sector mobilisation and a push for ‘innovative’ finance, reflecting targets outlined in the New Collective Quantified Goal on Climate Finance (NCQG) that push funds to tap into wider financial flows. But this shift is not uniform across the landscape — the Adaptation Fund (AF), for instance, continues to operate through grant-based financing for adaptation projects. In this context, ‘complementarity and coherence’ is now linked to both access and scaling up climate investment.

This paper reviews how complementarity and coherence has developed as a policy agenda and how it is being applied across the four main multilateral climate funds (MCFs): the AF, Green Climate Fund (GCF), Global Environment Facility (GEF) and Climate Investment Funds (CIF) (referred to collectively in this paper as ‘the funds’). The analysis is based on a review of UNFCCC decisions and fund documents, along with interviews with stakeholders from LDCs, SIDS and the funds themselves. These interviews provide insight into how

countries perceive complementarity and coherence and its impact on their access to finance.

From principle to policy direction

Complementarity and coherence has evolved from a loosely defined principle into a structured area of policy and practice across the major climate funds, including the AF, GCF, GEF and, to a lesser extent, the CIF. Early decision texts, which guided the funds through the UNFCCC COP, framed coordination in general terms, with limited operational guidance. More recent COP decisions have clarified that complementarity and coherence should go beyond coordination to improve access for developing countries without introducing new barriers. In parallel, the funds have expanded their collaboration through joint statements, technical working groups and bilateral initiatives. Their 2024 draft action plan on complementarity and coherence provided a clearer articulation of intended actions, but its lack of formal adoption and the subsequent shift towards ad hoc implementation via inter-fund working groups has made it difficult to track progress and accountability across funds. Although initial joint results reporting — including the first multilateral climate funds joint results report — represents a step towards more systematic transparency, it does not yet provide a clear basis for assessing complementarity and coherence implementation across funds.

Operationalising complementarity and coherence

The funds have developed a wide range of complementarity and coherence activities. These include fast-track accreditation pathways, alignment of selected monitoring indicators, joint reporting products and pilot initiatives on joint financing and scaling up projects.

There has also been increased emphasis on coordination at country level, including through country platforms and planning processes to align different funding sources with national priorities. While these initiatives aim to improve coherence, they often rely heavily on national institutions to manage coordination across funds.

Balancing access and scale within complementarity and coherence

At the same time, the complementarity and coherence agenda is not solely focused on access. It also reflects the broader priorities of the funds and their contributors, including scaling up finance, mobilising private sector investment, strengthening engagement with multilateral development banks, and being more efficient and effective with the funds they have. This introduces a dual objective within complementarity and coherence, where improving access for vulnerable countries must remain prominent alongside efforts to maximise financial impact at scale, especially in today's uncertain funding landscapes.

Country experiences and perspectives on access

Stakeholders from LDCs and SIDS broadly support the idea of greater complementarity and coherence across funds but report that the benefits are not yet visible in practice. Access to climate finance continues to be shaped by fragmented systems, with different accreditation requirements, application formats and reporting processes. For many, the concept remains more visible in discourse than in their day-to-day interactions.

Awareness of the agenda is uneven within LDCs and SIDS, and it rarely features as a distinct priority in negotiations or governance discussions. As a result, country experiences and challenges do not consistently feed into complementarity and coherence design or implementation. Some stakeholders describe it as being an overly abstract concept, while others point to a gap between the stated intent of simplifying access and the operational reality of navigating multiple systems.

A recurring concern is the growing expectation that it is down to individual countries to manage coherence across funds. While national ownership is important, this shift risks transferring complexity from the international system to national institutions, whose capacity to absorb it is often limited.

Key findings

This research finds five key areas of concern.

- **Rhetoric-reality gap:** the funds have launched many complementarity and coherence initiatives, but progress is hard to measure. The most visible and prominent successes have been in communications and dialogue, while tangible progress on formal oversight, metrics and accountability is more limited. At the same time, many interviewees from LDCs and SIDS report only modest benefits, as they continue to navigate fragmented procedures and meet multiple sets of requirements. The promise of simpler access has not materialised consistently across MCFs, despite COP guidance explicitly linking complementarity and coherence to easier and cheaper access to finance.
- **Accreditation and standards:** although highlighted as possible routes to improved access, the harmonisation of standards and templates, agreement of functional equivalency and mutual recognition of accreditation statuses across funds raise concerns. Interviewees warn that common procedures could either raise burdens (if reflecting the strictest standards) or dilute strong safeguards (if reverting to the weakest), undermining the purpose of climate funds being designed to pursue climate justice and respect for human rights through their operating values. Accreditation pathways (such as fast-track options) help some countries but are not uniformly available, so getting accredited to multiple funds to take advantage of their unique characteristics remains a challenge.
- **Country burden:** coordination currently falls heavily on national institutions, with governments and local entities juggling different fund schedules, reporting systems and accreditation processes. This can strain capacity in poorer countries and dilute country ownership.
- **A specificity gap:** forums to articulate how complementarity and coherence could address specific and persistent barriers to access are limited, with the formal process of fund oversight through the COP offering few spaces for the desired specificity of guidance.
- **Access-driven focus:** guidance from the COP explicitly links complementarity and coherence to making finance easier and cheaper to access, with coordination increasingly framed as a way to help LDCs and SIDS, rather than a bureaucratic formality.

Complementarity and coherence is a significant portfolio of work with increasing prominence in the 'implementation era' of the Paris Agreement. It represents an opportunity to improve the functioning of the climate finance system in a context of rising demand and constrained public resources. The expansion of collaboration across the funds reflects their recognition that fragmented systems are not delivering effectively for those most in need.

But its current trajectory is not yet delivering consistent improvements in access for LDCs and SIDS. While policy frameworks and collaborative activities have expanded, these have not translated into meaningful operational changes that reduce the burden on countries.

There needs to be greater emphasis on ensuring complementarity and coherence delivers more tangible improvements in access. This includes strengthening transparency around ongoing activities, clarifying accountability for results and ensuring country perspectives are more systematically integrated into initiative design. Efforts to harmonise processes could integrate board members and observers from across the

funds, as well as technical secretariat staff, to improve understanding of what complementarity and coherence can address and where there may be structural barriers to making more significant changes. Funds can use their existing networks and forums — such as the Community of Practice for Direct Access Entities, the LDCs Expert Group or the Taskforce for Access to Climate Finance (with some targeted reinvigoration) — to understand the challenges involved.

Improving complementarity and coherence across the funds is a complex task that needs to balance a range of perspectives. Increasing mutual understanding between different boards, secretariats and parties may present an opportunity to prioritise key access issues felt by LDCs and SIDS across more concrete complementarity and coherence workplans so that action corresponds to their barriers.

Ultimately, the success of complementarity and coherence will depend on whether it can move beyond high-level coordination to deliver concrete, practical changes that make climate finance access easier for those who need it most.

1

Introduction

The need for improved access to the climate funds under the UNFCCC has long been raised as an issue by the LDC Group and the Alliance of Small Island Developing States (AOSIS). The international climate finance architecture is extraordinarily complex, with a multitude of funds and flows, each governed in different ways. This complexity is a challenge for the countries that are most in need of climate finance: LDCs and SIDS, whose special circumstances mean they have been prioritised for climate finance support.

Within the broader global climate finance architecture (see Box 1), a group of major climate funds have sought to work together to enhance access to climate finance, under and outside of UNFCCC guidance. This paper seeks to better understand these efforts — termed ‘complementarity and coherence’ (see Box 2, page 9) — by exploring the participating funds’ policies, practices and progress towards the goals they have set and, importantly, how this has been experienced by LDCs and SIDS.

Complementarity and coherence efforts have spanned across MCFs. In this paper, we look at efforts across and between the AF, CIF, GCF and GEF. The AF, GCF and GEF are UNFCCC financial mechanisms; the CIF is governed outside the UNFCCC. This paper focuses in particular on the efforts of the AF and GCF, which both also emphasise direct access to funding (see Box 3, page 10) and are seeking closer alignment with one another. We also look at the Fund for Responding to Loss and Damage (FRLD), which drew on the experiences of the other funds in its conception and,

BOX 1. THE GLOBAL CLIMATE FINANCE ARCHITECTURE

The global climate finance architecture is a complex, fragmented web of funds and flows that are both public and private, grant based and profit seeking. Robertson (2024) characterises a distinction between climate finance sources (entities whose funds are used to provide climate finance) and channels (entities through which that finance is accessed and delivered).

Channels of climate finance can be governed both within and outside of the UNFCCC. This means that some channels — the GCF, AF, GEF and FRLD — are overseen by the UNFCCC COP, while others (such as the CIF) operate under their own governance mechanisms and are outside the oversight of the countries that make up the COP.

There is a huge array of funds, best explored through the Climate Funds Update website, <https://climatefundsupdate.org/about-climate-finance/global-climate-finance-architecture>.

in 2025, began to be more actively integrated into interactions between the other funds on complementarity and coherence topics. Established in 2022, the FRLD is the newest climate fund under the UNFCCC and so has had the opportunity to embed from the outset the benefits of complementarity and coherence in its operations (and to try to avoid some of the pitfalls).

1.1 What is complementarity and coherence?

The concept of complementarity and coherence within the global financial architecture has existed for some time. As early as 2014, UNFCCC guidance during COP20 in Lima requested the GCF “to enhance its collaboration with existing funds...to enhance the complementarity and coherence of policies and programming at the national level” (Decision 7/CP.20 in UNFCCC, 2015). Today’s vision for complementarity and coherence emerges in different places. Following a decision at its 13th board in 2016, the GCF convened an annual dialogue of climate finance delivery with the objective of enhancing complementarity and coherence between the GCF and other funds at activity level (SCF, 2017). It convened the dialogue four times between 2017 and 2021, bringing together the four funds for discussions on improved coordination. The heads

of the funds issued joint annual statements in 2021, 2023 and 2024 (AF et al., 2021; GCF, 2023a, 2024a) outlining their goals and actions on complementarity and coherence. In 2024, they developed a draft action plan, providing some public clarity on their forward-looking priorities in this area. But this plan has not been updated as a comprehensive map of complementarity and coherence action across the funds. Instead, technical and working groups have developed across the climate funds to explore and progress, such as indicators.¹

In a joint statement issued in 2023 at COP28 in Dubai, the four funds outlined their aim to “enhance access to climate finance by working together across the areas of [their] activities” (GCF, 2023a). The statement is the most explicit declaration of intent for complementarity and coherence, outlining the following key ambitions:

- Enhancing working together across areas of activities
- Increasing collaboration in capacity-building support
- Developing greater synergies in programming and between theories of change, scaling up projects and exploring joint programming
- Expanding collaborative work on monitoring, evaluation and learning, with development of key common indicators
- Harmonising procedures and processes to address the level of complexity in interacting with the climate funds

In their vision for complementarity and coherence, the funds also expand on their interest in mobilising financial flows from the private sector and exploring innovative financial instruments and learning exchanges to attract the private sector. They speak to goals of increased collaboration with multilateral development banks (MDBs) and framing the maximisation of impact within these financial realms. The AF, however, represents a notable exception, given its grant-based mandate and the structural challenges it has identified in aligning with MDB private sector operations.

These discussions raise questions as to the extent to which the developments around complementarity and coherence in fund policy and practice are leading to improved outcomes for LDCs and SIDS on terms they themselves have articulated. For example, climate-vulnerable states have consistently demanded simplification of the processes to access funds (Trieche et al., 2026). Yet, if simplification manifests itself as financing processes with standards harmonised to that of the lowest common denominator between funds, or couches climate projects in language that emulates MDBs, there is a danger that the special circumstances of LDCs and SIDS may be lost in the process, or the particularities of funding climate action in line with the

BOX 2. DEFINING COMPLEMENTARITY AND COHERENCE

The joint draft action plan offers a definition that complementarity is about “ensuring that our distinct roles and advantages are clearly expressed so that access to finance is simplified,” with the implication that coherence is about “harmonizing our procedures and processes where possible, recognizing that each Fund has different modalities and business models” (AF et al., 2024).

The GCF explicitly defines complementarity and coherence in a policy brief, saying “Complementarity refers to synergies among the various climate funds’ activities in similar sectors and themes (adaptation or mitigation), and even across regions of similar characteristics, with the aim of scaling up transformative actions. Coherence is about using country programming to seek alignment with nationally determined contributions (NDCs) and national adaptation plans (NAPs)” (GCF, 2021a).

The AF lists complementarity and coherence as a crosscutting theme in its second medium-term strategy but does not offer a definition of each word (AF, 2022). It uses the phrase when discussing its partnership approaches with other funders and in relation to partner countries, identifying its relevance to “accelerate effective adaptation action, innovation and learning in developing countries.”

These definitions highlight very different aspects of complementarity and coherence, with notable inconsistency.

¹ Collaboration between the funds influenced the AF’s 2025 revisions of the Strategic Results Framework (AF, 2025a).

justice-based values enshrined in the UNFCCC be erased or subsumed.

This paper explores the policies and practices for complementarity and coherence, how the funds themselves present this work, how they take action on the goals they have set themselves in these areas, and how LDCs and SIDS have experienced the initiatives, especially as it relates to any perceived easing of access to climate finance. Where there are differences in understanding of complementarity and coherence, this paper seeks to understand how that may have come about and identify structural barriers to a common understanding of the concept, especially as it relates to access to finance.

1.2 A note on methodology and approach

This paper is an attempt to corral information on complementarity and coherence across the MCFs, with the understanding that this is an important area of fund policy development and a potential conduit for reshaping the international climate finance architecture that it is often overlooked or misunderstood by Parties to the UNFCCC, negotiators and those watching the climate funds. Although the term ‘complementarity and coherence’ sounds straightforward and innocuous, it carries a technical meaning and significant workplan across major sources of critically needed climate finance for climate-vulnerable countries.

Our research is based on a review of UNFCCC decision texts, fund policies and board documents, complemented by supporting areas of grey literature and research from policy-oriented thinktanks. These findings are supplemented by interviews with key actors from LDCs and SIDS, including national authorities, direct access entities (DAEs), fund board members and advisers, and civil society observers, and from the AF and GCF. We spoke with participants about their perceptions and understanding of complementarity and coherence, what they identify as potential benefits and risks, and whose interests the complementarity and coherence agenda serves.

There are limitations to this paper. We were constrained in the number of interviewees, and one person's view is not representative of a whole group. Participation in interviews was voluntary and those who positively responded to the invitation may also be self-selecting into a group of participants who are familiar with the discourse on complementarity and coherence. We took a semi-structured approach to the interviews, allowing interviewees to guide the discussion to areas they were most interested to explore. This brought out rich conversation but means comparability across interviews is limited to specific topics, rather than forming a complete and cohesive data set.

From the four funds involved in complementarity and coherence, we have chosen to focus primarily on the AF and GCF, with some consideration of GEF and no significant discussion of CIF. This is because we wanted to focus on those MCFs that are formally overseen by the COP rather than by boards alone, particularly on those that offer countries direct access to climate finance (see Box 3), given the importance of this access modality for LDCs and SIDS.

This paper does not intend to be an evaluation of complementarity and coherence policies and practices. Instead, it seeks to open up this complex and evolving, yet under-researched, area of climate fund policy and process to consider how it can better improve access to finance (especially adaptation finance) for LDCs and SIDS. The views expressed in this paper are those of the authors, based on the analysis undertaken, and do not necessarily reflect those of the funds, their boards or their contributors.

BOX 3. DIRECT ACCESS TO CLIMATE FINANCE

Direct access is a modality pioneered by the AF and taken up by the GCF whereby national, subnational and regional institutions can gain accreditation to access funding from to finance projects and programmes in their countries or regions (thus avoiding intermediation by MDBs or other agencies). At the GCF, these national, subnational and regional entities are called regional and national DAEs; at the AF, they are called National Implementing Entities (NIEs) and regional implementing entities.

The benefits of direct access include greater ownership and control over national climate programming, improved ability to align programming with national priorities, investment in national capacities to source and manage funding for climate action and the avoidance of international implementing entity fees.

Achieving direct access is a challenging, resource-intensive and complex procedure, posing a major challenge to LDCs and SIDS in particular. As of January 2026, 60 of the 76 eligible LDCs and SIDS still lack a single national direct access project from either fund.

AF and GCF also work through international access modalities where accredited international entities — such as MDBs, United Nations agencies and international nongovernmental organisations can access and channel finance on behalf of countries or regions. The GCF refers to them as international accredited entities; the AF, as multilateral implementing entities.

2

Developing a complementarity and coherence policy area

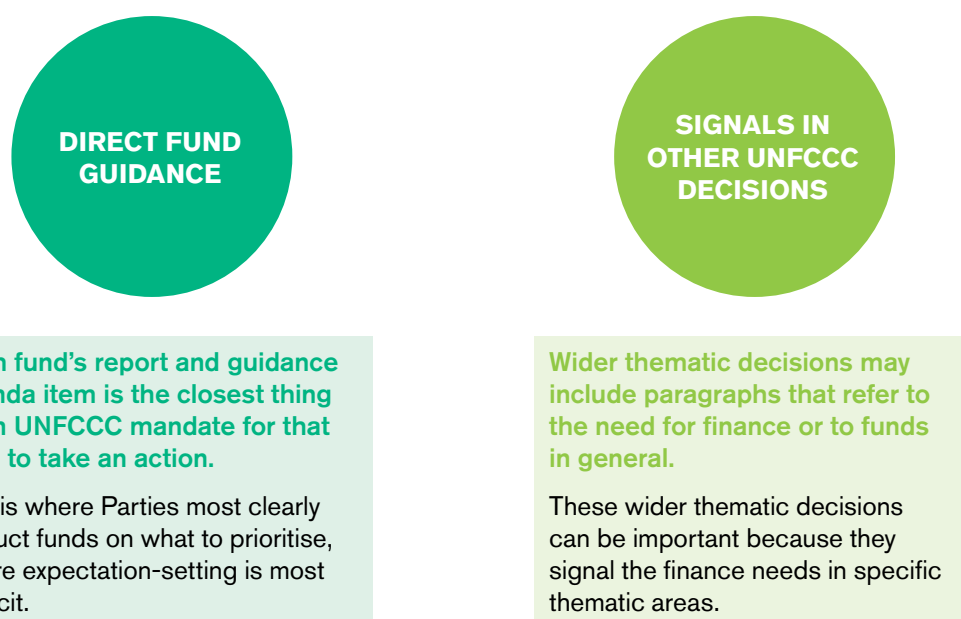
There are various forms of collaboration and complementarity and coherence between the funds. The web of connections between the different funds is dense, with an array of joint statements, draft action plans, annual reporting, common communications materials and meeting reports.

This section provides a grounding in what the climate funds are seeking to achieve with complementarity and coherence by explaining the development of this work area through the formal negotiations at the UNFCCC COPs, the coordination between the climate funds on a policy level, and the individual movements towards complementarity and coherence within each fund. This section will assess progress made and highlight limitations of the work to date in its goal of improving access to climate finance for climate vulnerable countries, especially LDCs and SIDS.

2.1 COP-MCF interactions in the complementarity and coherence work area

Over the past decade, the UNFCCC has persistently emphasised the importance of complementarity and coherence among climate finance mechanisms — particularly the GCF, GEF and AF — as a route to taking action on climate change. But the mandate for complementarity and coherence remains uneven. While the principle is broadly supported, the clarity, specificity and enforceability of decision texts vary considerably. This has led to varied interpretations and degrees of implementation across the funds.

Figure 1. Guidance and wider influences on climate funds



The COP sets system-wide expectations for how the UNFCCC financial mechanism should function.² Article 11.1 of the UNFCCC makes clear that the financial mechanism “shall function under the guidance of and be accountable to the COP, which shall decide on its policies, programme priorities and eligibility criteria” (UNFCCC, 1992). Since the 2015 Paris Agreement entered into force, this role has also extended to the COP serving as the meeting of the Parties to the Paris Agreement (CMA).

While the COP and CMA often meet in parallel and maintain aligned agendas, they are distinct legal bodies. The CMA is solely responsible for overseeing the implementation of the Paris Agreement, while the COP retains authority over the UNFCCC and its financial mechanism. Each body therefore governs and implements its respective treaty only. It is important to note that only countries that have ratified (formally approved) the Paris Agreement participate in the CMA, so a country can be a Party to the UNFCCC and participate in the COP but not be a Party to the Paris Agreement nor participate in the CMA. The funds at the centre of this paper — the GCF, GEF, AF and FRLD — are designated as operating or financial entities under the UNFCCC, and Parties expect them to respond to COP and CMA guidance. The CIF, by contrast, lies outside this structure, though it recognises the “primacy of the UNFCCC regime on climate finance matters” (Robertson, 2024). The most

direct expression of how the COP communicates its requests to the funds is through the annual “guidance to the [fund name]” decision, which is negotiated and adopted by consensus. These decisions signal political expectations on policy issues such as access, priority themes and coordination, leaving operational discretion to the fund boards.

The pipeline shaping this guidance follows a recurring rhythm. Each year, Parties to the COP and CMA submit inputs on what they want the funds to prioritise and the Standing Committee on Finance (SCF) compiles these alongside an analysis of the funds' annual reports. Then, the COP and CMA each negotiate and adopt the final guidance that funds are expected to follow in their operations. The funds report to the COP and CMA annually, outlining their responses to the guidance and any measures undertaken and progress made in line with it.

This process is visible in the decision texts, which often invite submissions, request the SCF to consider these and call on funds to explain how they have acted on the guidance. It is through this iterative process that high-level political priorities are translated into fund-level implementation. It also allows Parties to connect other COP/CMA decisions from thematic areas, such as adaptation, mitigation, transparency or technology, to the finance architecture by feeding those decisions into the next round of guidance.

² Under the UNFCCC, the financial mechanism refers to how developing countries receive climate finance. Primarily through the GCF and GEF, which are designated as its operating entities, it also includes the AF, Least Developed Countries Fund and Special Climate Change Fund. The COP provides guidance to these funds, setting their policies, priorities and eligibility criteria. The financial mechanism also serves the Kyoto Protocol and Paris Agreement.

Although the LDC Expert Group (LEG) can raise concerns on behalf of LDCs and engage directly with the climate funds on LDC-specific matters related to their national adaptation plans (NAPs), it does so under a separate COP agenda item on matters relating to the LDCs. So, while the LEG can submit inputs on guidance through the SCF process, its submissions rarely explicitly discuss complementarity and coherence, given the expectation across the COP that finance matters are discussed under the dedicated agenda item on guidance to the funds (Interviewee 1).

After 2026, the timing of guidance to the GCF and GEF is set to change, from an annual to a two-year cycle, with additional inputs aligned with replenishment milestones or as needed (Decisions 3/CP.29 and 4/CP.29 in UNFCCC, 2025b). This adjustment reflects a shift towards more structured planning and delivery cycles, aiming to better align political direction with the funds' operational timelines. But it will also reduce opportunities for Parties to give guidance to the climate funds.

2.1.1 Evolution of guidance: from broad encouragement to access-focused direction

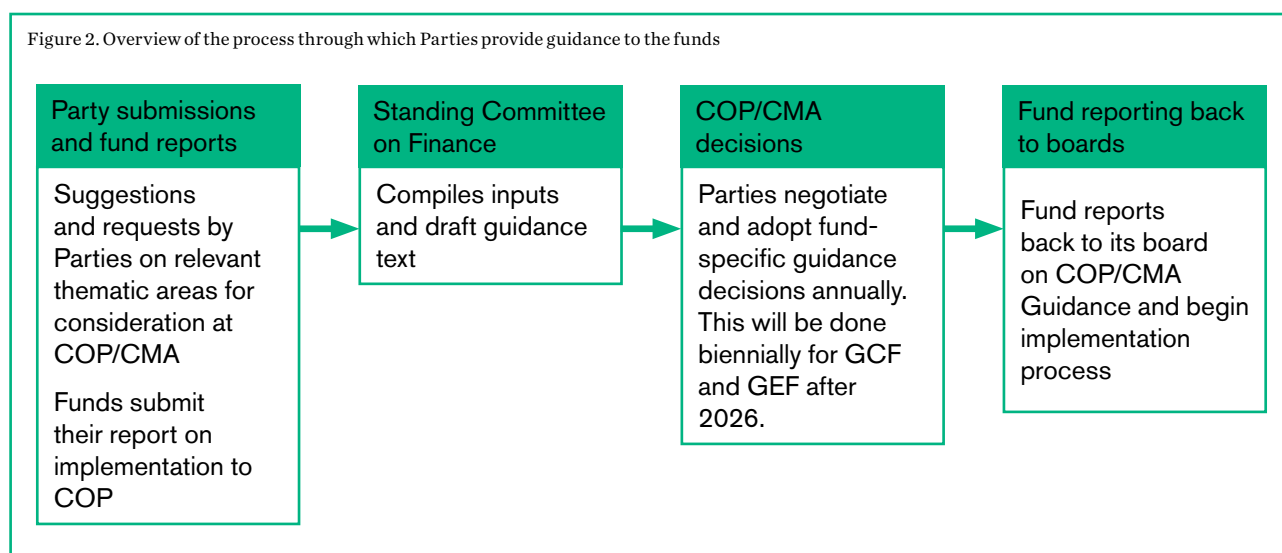
After COP15 in Copenhagen in 2009, decisions in the negotiation texts invoked complementarity and coherence in largely aspirational terms, offering high-level support for the topic without clear guidance on operationalisation. At COP20 in 2014 in Lima, Parties requested the GCF to “enhance its collaboration with existing funds” to promote coherence in national programming, while the Fifth Review of the Financial Mechanism merely “encouraged” operating entities to address complementarity and coherence (Decision 7/CP.20 in UNFCCC, 2015). This trend of limiting the strength of verbs in the guidance continued the following year at COP21 in Paris, where guidance to the

GCF and GEF was similarly framed in soft, non-directive language, urging improvement, welcoming engagement, and calling for further articulation of complementarity, but ultimately deferring to the discretion of fund boards (UNFCCC, 2016). The repeated use of verbs such as ‘encourage’ and ‘welcome’ reflected weak mandates, signalling political endorsement without enforcement.

A modest shift began after Paris, as Parties started linking complementarity and coherence to institutional processes. At COP22 in 2016, for example, Parties noted the GCF's development of an “operational framework on complementarity and coherence” in formal decisions, with guidance calling for the examination of “consistency and complementarity” across finance channels, including in enabling environments and investment scale (Decision 10/CP.22 in UNFCCC, 2017a). These references, while still non-prescriptive, began to anchor complementarity and coherence within reviews and frameworks rather than treating it solely as a normative ideal. The third review of the AF further extended this approach, asking for an assessment of how project programming aligned with institutions under the UNFCCC (Decision 1/CMP.12 in UNFCCC, 2017b). Together, these decisions mark the early stages of embedding complementarity and coherence as a benchmark for evaluating fund performance rather than an abstract principle.

A key inflection point came in 2018 at COP24, especially in decisions related to adaptation finance. Until then, the AF primarily served countries under the Kyoto Protocol, drawing its resources from a share of proceeds from the Clean Development Mechanism. Its governance and mandate were firmly situated under the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (CMP), and it was not directly accountable to the Paris Agreement framework. But in 2018, Parties decided that the AF would serve the Paris Agreement under the guidance of and accountable to the CMA (Decision 2/CMP.14 in

Figure 2. Overview of the process through which Parties provide guidance to the funds



UNFCCC, 2019a; Decision 13/CMA.1 in UNFCCC, 2019b). More than an administrative handover, this represents a fundamental shift in governance, political alignment and future resourcing of the AF. The CMA also decided that, once proceeds under Article 6.4 of the Paris Agreement became available, the AF would cease to serve the Kyoto Protocol, transitioning the fund firmly into the Paris regime, changing its reporting lines and expanding its reliance on voluntary contributions and future proceeds under Article 6.4. For the first time, a fund originally created under the Kyoto Protocol would become structurally embedded within the Paris Agreement, reinforcing expectations that it would deliver on broader Paris-aligned climate finance priorities. This move also signalled a more explicit expectation that coherence between funds be operationalised across legal regimes, not just stated in principle. These decisions reflected an evolving understanding that complementarity should not only be declared, but also shape how funds interact in practice.

At COP26 in Glasgow in 2021, the guidance provided to all three major climate funds marked a turning point in complementarity and coherence framing. The COP welcomed the GCF and GEF's shared Long-Term Vision on Complementarity, Coherence and Collaboration (LTV) and, for the first time, explicitly linked coordination efforts to enhancing the impact and effectiveness of climate finance (Decisions 6/CP.26 and 7/CP.26 in UNFCCC, 2022b). The fourth review of the AF deepened the expectation that coherence should result in improved delivery and impact on the ground (UNFCCC, 2022c). This marked the first time that complementarity and coherence was framed not simply as a way to avoid duplication, but as a lever to improve the performance of climate finance delivery.

This shift gained further momentum at COP28 in Dubai in 2023, which placed 'access' at the centre of the complementarity and coherence agenda. In formal guidance to the GCF, the COP called for enhanced coordination, "thereby improving access to climate finance and lowering transaction costs" (Decision 6/CP.28 in UNFCCC, 2024a). This was not just political signalling; it was a negotiated instruction, adopted by consensus, that clarified what coordination should achieve for developing countries. The SCF, which compiles submissions and supports draft guidance, plays a technical role upstream, but the final mandate is set out in the COP's decision text. Additional COP28 guidance reinforced this access lens as the GEF guidance decision linked complementarity to streamlined procedures, making clear that coordination should reduce, rather than add to, the burden on those seeking funding (UNFCCC, 2024a).

Yet, adoption alone does not guarantee effectiveness; the way something is implemented is just as important. At COP29 in Baku in 2024, Parties shifted their

focus to addressing a growing concern that poorly executed coordination could create new, rather than eliminate, barriers. To this end, guidance across the GCF, GEF and AF explicitly called on all three funds to ensure that efforts to enhance complementarity and coherence would not restrict developing countries' access to resources (Decisions 3/CP.29 and 4/CP.29 in UNFCCC, 2025b; Decision 9/CMA.6 in UNFCCC, 2024b). These safeguards represent a maturing agenda: the goal is no longer just to improve efficiency or maximise alignment, but to make sure coordination serves equity, country ownership and real-world accessibility. Taken together, the decisions from COP26 to COP29 build a stronger, if still non-binding, architecture of guidance, reflecting a shift towards more strategic, outcome-oriented, access-driven expectations of how climate funds should work together.

2.1.2 Complementarity and coherence in the NCQG era

Agreed in November 2024 in Baku, the NCQG called for the commitment of US\$300 billion per year in climate finance for developing countries and the scaling up of financing from an array of public and private sources to at least US\$1.3 trillion per year by 2035 (UNFCCC, 2024c). This quantified goal replaces the relatively arbitrary financial goal set in 2009 to achieve the provision of US\$100 billion per year for developing countries. The NCQG pointed to the role of the MCFs as key players in delivering on this new goal to help developing countries access climate finance. The NCQG aims to at least triple annual outflows by 2030 and calls for climate funds to work on harmonising processes and streamlining reporting processes, among other activities. This speaks directly to the role for complementarity and coherence, anticipating that this area of policymaking will become increasingly visible in negotiations (and, subsequently, fund board meetings) and carry more weight in any reforms at the funds.

2.2 Developing policy and shaping priorities at operational levels

The climate fund secretariats and boards decide how to integrate COP guidance into their annual (or multiannual) work plans. The COP tends not to be overly prescriptive, deferring instead to the fund boards on how to achieve the guidance, so individual funds can choose how they integrate complementarity and coherence. One interviewee noted that the boards can also defer to the secretariats on certain items, reducing Parties' active direction-setting further down the governance structure chain (Interviewee 5).

Each fund has its own distinct governance process through which it mandates its secretariat to collaborate,

and as a result use multiple avenues to operationalise COP guidance on complementarity and coherence. This paper looks at four avenues to analyse what topics dominate in the way funds address complementarity and coherence, keeping in mind the research interest of improved access for LDCs and SIDS:

- Heads of MCF joint statements, associated draft action plan and other defined work areas
- Bilateral approaches
- Internal reforms in individual funds, and
- Communications.

2.2.1 Joint statements, draft action plan and other defined work areas

Joint statements from heads of MCFs offer the most accessible insight into what the four climate funds are doing together on complementarity and coherence. They first began publishing these joint statements in 2021, in the context of post-COVID solidarity and the push to use economic recovery to invest in responses that would also benefit the climate (GCF, 2023a, 2024a; AF et al., 2021). The funds pledged to work together to maximise the impact of their respective programmes by exploring synergies in programming bilaterally and across funds, formalising a joint knowledge sharing partnership, developing methodologies to maximise climate impacts through project design and monitoring and evaluation, and enhancing communications and outreach efforts (AF et al., 2021).

In the 2023 annual statement, the focus shifts from inward-facing exploration and identifying where they could make efficiency gains within existing practices across the funds, towards a more active review of how they can introduce new approaches to directly benefit partner countries. The statement highlights their aim to work on “simplified and improved access to climate finance” that can better serve local needs and develop a “concrete action plan to enhance access to climate finance” as a group of collaborating climate funds (GCF, 2023a). It also references practical steps to improving access to climate finance, such as strengthening collaboration across programming, capacity-building, monitoring and learning, and joint project development (GCF, 2023a).

The 2024 joint statement reiterates the importance of “closer collaboration around simplifying access to funding” and “streamlin[ing] processes to more effectively meet the needs of our country partners” (GCF, 2024a). The statement references practical actions the funds have taken via the draft action plan on complementarity and coherence (AF et al., 2024), such as steps to align indicators and processes, and undertaking more coordinated planning “to ensure

our future investments complement and build on each other.” It also lists expanding direct access and new locally led programming channels as evidence of the funds’ response to calls for greater alignment of accreditation and access requirements and more flexibility in programme and project design and implementation (GCF, 2024a).

These statements clearly present improved access as a central motivation behind the funds’ efforts to work together on the issue.

The 2024 draft action plan was developed to put the words of the joint statements into action. But it was seemingly never consolidated into a finalised plan. The GCF claims that this is to reduce administrative burden of frequently updating the plan (Interviewee 9), maintaining that the inter-fund working groups are taking forward tasks from within the framework. The draft action plan was explicit about what the four climate funds would do to improve access to finance. Table 1 collates items from the draft plan and compares them with the goals outlined in the 2023 annual joint statement to assess and clarify the actions proposed for the different parts of the complementarity and coherence agenda, bearing in mind that some actions could be relevant to a number of goals.

Given the shift away from maintaining the draft action plan in favour of working groups, the status of the actions in Table 1 — whether they are still planned, have been abandoned or are ongoing — remains unclear. The GCF’s annual reporting to their board on complementarity and coherence-related activities states that task teams still refer to draft action plan as a guide (GCF, 2025a), but in practice, reporting against individual activities is not easily comprehensible when analysing the different funds’ annual reports.

One of the more advanced areas of technical work across the funds has been in developing results frameworks and harmonising indicators. Analysis of references in fund reports to the COP from 2024 to present indicates instances of workshops involving the four funds (organised, and mainly reported on, by the AF) that were “aimed at harmonizing indicators and measurement among these Funds” (UNFCCC, 2025a). At COP29 in 2024, the funds presented a joint indicator mapping that outlined areas where they were developing a common approach to measuring climate results. This was followed in 2025 by the publication of the funds’ joint results report (GCF et al., 2025). The GCF Observer Group questioned the timing and production of such a report, citing concerns that the selection of indicators “may prejudice work that is yet to be presented to the [GCF] Board, such as on the harmonized results management framework” (GCF Watch, 2025). This suggests that secretariat-level efforts to advance harmonisation may be outpacing the appetite of some in the fund governance structures.

Table 1. Alignment between the goals for improved access in the 2023 joint statement and 2024 draft action plan

JOINT STATEMENT GOALS (GCA, 2023a)	DRAFT ACTION PLAN GOALS (AF ET AL., 2024)
GOAL 1: We will enhance access to climate finance by working together across the areas of our activities	▪ Explore opportunities to contribute to and/or lead one or more country platforms in a coordinated manner with public and private stakeholders ▪ Jointly develop knowledge products to help guide recipients, contributors and investors to engage with the MCFs to improve understanding and overall engagement ▪ Examine and identify opportunities for more significant simplification and harmonisation to the accreditation/reaccreditation processes to relevant funds
GOAL 2: We will seek to increase collaboration within our capacity-building support, recognising that developing countries need the capacity to turn climate plans into projects and move from ambition to action	▪ Strengthen coordination of capacity-building support for country planning for NDCs, NAPs and long-term strategies, including enhanced complementarity in using readiness funding and other capacity-building funds ▪ Support country-driven investment planning: coordinate efforts to support the development of country-owned investment plans ▪ Leverage country engagement channels and implementing joint capacity-building/training for stakeholders in countries ▪ Coordinate technical assistance by aligning longer-term technical assistance funding — including capacity building and project preparation funds — to provide support to countries for climate investment planning and project preparation, including to local/national partners ▪ Create a knowledge product that analyses evidence on the social, economic and environmental benefits of strong gender and social inclusion elements within climate investments ▪ Develop knowledge on innovative approaches: explore cutting-edge financial and innovative tools and practices to support climate action
GOAL 3: We will aim to develop greater synergies within our programming and between our theories of change, and to scale up projects. [...] We will develop [collaborative programming initiatives] and further explore the potential for joint programming initiatives that could allow us to deploy our collective resources at a larger scale and with greater efficiency	▪ Develop a mapping matrix (of operational and programming cycles of each fund) ▪ Publish a joint document comparing the profiles and features of each MCF ▪ Collaborate on thematic and geographic programmes: engage in consultations across the MCFs on coordinating geographic and global thematic programme ▪ Elaborate the added value of MCFs to the development of and engagement with country platforms in the broad climate finance architecture context
GOAL 4: We will ramp up our collaborative work on monitoring, evaluation and learning, including through the development of common indicators, alignment of our results frameworks and the development of a common database for climate projects taking into account innovative tools	▪ Undertake a feasibility assessment to identify opportunities to harmonise results indicators ▪ Design a common project explorer platform using innovative tools to increase access to and transparency of information on MCF projects through a phased approach, starting with a foundational library platform that gathers information about ongoing projects ▪ Coordinate the development of joint annual reporting of MCF contributions to the climate finance architecture and results within countries ▪ Publish joint dissemination products on case studies and lessons learned on specific sectors/topics, building on evaluative and monitoring evidence ▪ Further develop the joint project explorer platform to include innovative tools
GOAL 5: We will move towards harmonisation of our procedures and processes, recognising that complex application procedures, which are different for each fund, can be a significant barrier to accessing to climate finance	▪ Convene a working group on operational process that identifies opportunities for simplification and harmonisation of processes, including concerning project-related procedures ▪ Strengthen the engagement and consultation processes across MCFs, including sharing information and providing inputs

Source: Authors' own, based on GCA (2023a) and AF et al. (2024).

The AF, which had been leading the engagements with other funds on results, presented proposed revisions to its Strategic Results Framework at these joint workshops, including analysis of the similarities and gaps between the funds' results frameworks. Presenting this line of work to the AF Board in October 2025, the team justified links between changes to the indicators by comparing them with the other climate funds and ongoing work areas in climate governance, such as the Global Goal on Adaptation, which was developing a set of indicators between 2023 and 2025 (Yassin et al., 2026). But differences in definitions and aggregation approaches for beneficiary indicators across funds continue to limit comparability of these metrics (GCF et al., 2025). One interviewee from the AF considered the development of the AF's revised indicators as a tool to improve access, a sentiment echoed by the justifications given for changes to the Strategic Results Framework, which explicitly framed one indicator as consistent with the GCF's integrated results management framework and as a means of "reducing entity and country burden" (AF, 2025b). The AF also has a similar justification based on a desire to simplify things for users.

There has also been progress between the funds on complementarity and coherence areas that have a more direct bearing on access to finance, such as joint programming, accreditation, project preparation and identifying opportunities for simplification. Items in Table 1 that appear to have a more indirect bearing on country access to finance include the project explorer platform, joint annual reporting of fund contributions and knowledge products.

But the joint statements are not just about improving access for recipient countries; they also feature a second theme of increasing impact and the role of the climate funds within the broader climate financing landscape. Though this focus was not present in the 2021 statement (AF et al., 2021), the 2023 statement refers to the funds' goals of using their resources to mobilise greater financial flows from the private sector and other external sources, and to collaborate with MDBs to leverage financial tools and use blended finance to maximise the impact of international financial flows (GCF, 2023a). Similarly, the 2024 statement re-emphasises leveraging and mobilising funds to meet the needs of the NCQG, which was under negotiation at COP29 (GCF, 2024a). In it, the funds highlight their role as "enablers of wider climate action from financiers such as multilateral development banks and the private sector" and their "expanding [...] efforts and capacities to mobilise larger and more varied climate investments by the private sector" (GCF, 2024a). Their draft action plan also includes a goal to "mobilize greater financial flows from the private sector and other external sources of finance" (AF et al., 2021).

The growing emphasis on the climate funds as a force to mobilise other forms of finance is likely reflective of the increasing emphasis on private and non-concessional finance flows in the face of constricting grant-based climate finance provision and the increasing finance gap facing countries (Pettinotti et al., 2025). In the months after the NCQG was agreed, contributor countries became non-committal and explicitly negative in their pledges and contributions to climate finance (CARE, 2025). This puts pressure on the funds to expand their sources of finance from traditional donor contributors if they are to meet the funding requirements of their pipeline and other strategies, such as GCF's 50 by 30 Vision to manage \$50 billion by 2030 (GCF, 2023b). Debate on how the funds should respond to the NCQG's tripling decision is not straightforward, as highlighted by discussions at the AF and GCF board meetings (AF, 2025c). But it is clear that they have their different views on how to address the financing gap, which in the absence of increased donations and pledges, requires increased uptake of more financialised methods of securing funds.

2.2.2 Bilateral approaches

The full extent of complementarity and coherence work is not completely encapsulated by the joint statements and draft action plan. This is to be expected, given the significant differences in business models between the funds (see Table 2). Finding common ground between them all may be challenging, and the joint action plan and other documents refer to acting "where possible" and with respect of "the mandates and guidance" of each fund's governing body (AF et al., 2024). These distinctions are important, as each fund serves a different purpose, allowing countries to target funding to meet specific needs.

Finding common ground between two or three funds may be more feasible. As such, there are several additional initiatives between funds to harmonise processes, design methods to scale up projects through sequential financing, develop common indicators and results frameworks, and investigate approaches to joint programming.

Since 2021, the GCF-GEF LTV has sought greater harmonisation of policies, increased inter-fund dialogue, improved joint communications activities, joint programming and simplification of results indicators and monitoring and reporting (GEF, 2025a). An in-depth comparative analysis of their internal policies and processes completed in 2023 compares topics such as governance arrangements, the project cycle (including preparatory support) and results and impact frameworks and methodologies (Baastel, 2023). They are also making joint programming efforts in Uganda (GCF, 2024b), using the partnership formed under the Task Force on Access to Climate Finance to attempt

Table 2. Overview of climate fund characteristics

CHARACTERISTIC	AF	CIF	GCF	GEF
Financial mechanism of the UNFCCC?	Yes	No	Yes	Yes
Access modality	Through national, regional or multilateral implementing entities	Via MDBs	Through national, regional or international accredited entities	Through GEF agencies
Financial instruments	Grants	Grants Concessional loans Guarantees Direct funding	Grants Concessional loans Guarantees Equity investments	Grants (LDCF and SCCF)
Thematic focus	Adaptation	Adaptation and mitigation	Adaptation and mitigation	Adaptation and technology transfer
Dedicated private sector focus?	No	Yes	Yes	Not for LDCF/SCCF

Note: The GEF column of the table focuses specifically on the Least Developed Countries Fund (LDCF) and Special Climate Change Fund (SCCF).

concrete results of the bilateral complementarity and coherence arrangements; but results are not yet at an advanced stage.

Similarly, the AF-GCF bilateral scaling up framework has been in use since 2021. The 2024 Technical Evaluation Reference Group of the AF's (AF-TERG) scalability evaluation report points to progress made under this initiative, identifying 17 AF projects with potential to be scaled up and four countries in advanced discussions about implementing a scale-up (AF, 2024). Based on the latest figures from the AF, almost 30 projects have been scaled up through the fund or other sources, further increasing these impacts (AF, 2025d). Although the standard operating procedures for scaling between the AF and GCF were completed by July 2025, there was no clarity on whether this would be a streamlined route for countries to access climate finance (GCF, 2025a). The four-year period to produce a standard operating procedure may be indicative of the complexities facing the funds in accepting each others' project-level practices.

The route to fast-tracking accreditation between the AF and GCF is another example of where complementarity and coherence is being applied in a way that more directly reduces barriers to access for some. As early as 2014, the AF and GCF offered fast-track accreditation pathways for entities accredited by the GEF, AF and European Commission's Directorate-General for International Partnerships. Open to all kinds of accredited entities, not just national ones, it had been taken up by "all 19" of the AF's NIEs by the time of the GCF's independent evaluation of direct access in 2023. Data from that evaluation showed that

for DAEs using the fast track process, the time taken to accredit was reduced by 45% (GCF IEU, 2023a). The GCF board adopted the revised accreditation framework at its 42nd board meeting in 2025, offering a route for expansion of the fast-track pathway for entities accredited by other funds (GCF, 2025b) and initiating reforms under the "efficient GCF" initiative, which aims to improve predictability and alignment on climate finance (GCF, 2025c).

The Community of Practice of Direct Access Entities is another long-term AF-GCF forum for engaging with countries on a joint platform. Originally developed by countries with direct access to the AF and GCF, this initiative aims to improve countries' ability to develop programmes and projects that would be successful in securing funding via peer-to-peer learning. Both funds have supported the development of this community of practice, with the AF hosting the community's web presence and the GCF funding a readiness project between 2021 and 2023 to support knowledge management and capacity building in participating DAEs (GCF, 2021b). There is little discussion of the funds using the community of practice to address their bilateral common practices to improve access to finance; it is more about facilitating and enabling cross-country learning to improve access to finance on existing terms. That said, it is a valuable forum for funds, helping them to understand where the challenges lie in the application process and how countries are managing them.

The funds interact bilaterally as observers in each others' board meetings or as partners in learning and reflecting. The AF stresses opportunities for

coordination and collaboration with the GEF by virtue of the AF secretariat being hosted by the GEF secretariat. As well as participating in the GEF Council meetings as an observer, the two funds exchange information and interorganisational support when needed (UNFCCC, 2022a), improving their understanding of each other's processes. With GEF's lack of direct access for countries (the access modality pioneered by the AF), the lessons exchanged between them must reflect that major difference.

The new framework for cooperation between the AF and FRLD seeks to "leverage each other's resources and avoid duplication of efforts" (AF, 2025e). The two funds will work together on areas of readiness, knowledge sharing, resource mobilisation (including public and private sectors), support to countries and advocacy for adaptation and loss and damage needs. Among other access routes, FRLD will offer direct access for entities with AF accreditation, marking similarities in both fund access modalities and their related thematic specialism.

Tracing each of these bilateral arrangements in depth is beyond the scope of this paper, but this initial characterisation of the kinds of collaborative work individual funds are undertaking is more practical than attempting a four-way approach to complementarity and coherence. The differences between their operating models are so significant that the CIF would be unable to discuss, for example, mutual recognition of accreditation standards, given it works exclusively with MDBs and offers no direct access route.

2.2.3 Internal reform in individual funds

The climate funds operate as distinct entities with their own mandates, governance structures, business models and strengths. As such, their secretariats work from decisions made by their respective boards on their own priorities. Information on each fund's approaches to complementarity and coherence is captured in many places, such as annual progress reports or updates to the COP (for the GCF, AF and GEF).

The GCF provides the most consolidated reporting to its own board each year, with a dedicated Annual Update on Complementarity and Coherence. The board monitors progress against the 2018 Operational Framework for complementarity and coherence, framing activities under four pillars (GCF, 2017):

- Board-level discussions on fund-to-fund arrangements
- Enhanced complementarity at activity level
- Promotion of coherence at national programming level
- Complementarity at climate finance delivery level through an established dialogue.

These pillars outline slightly different priorities from the goals outlined in the joint statements and draft action plan. For example, the emphasis on promoting coherence at national level is an outlier. As part of this work, the GCF cites its work promoting country platforms, country programmes, pipeline development and country-driven coordination as tools for national actors to achieve coherence (GCF, 2025a). Likewise, 2024 developments in the Readiness and Preparatory Support Programme, in which countries are required to list how their application aligns with other agencies' and funds' readiness grants and capacity building initiatives puts the onus of bringing about coherence between climate funds to national level. This use of coherence is much more aligned with the GCF's own definition of the term as being about "efforts to align country programmes..., entity work programmes and other GCF modalities to support delivery of national climate strategies" (GCF IEU, 2023b) more than the 'coherence across MCFs', which is the more commonly used framing and the one we use in this paper.

2.2.4 Communications

The funds appear to be more clearly aligned in their public communications. For example, the GCF-GEF LTV dedicates an entire pillar of their engagements to communications and outreach, and the joint draft action plan names several communications-oriented activities. These are all very visible complementarity and coherence activities, but the progress made on communications goals (compared to other goals) could be indicative of it is harder to achieve the more substantial changes to fund operations required to improve access to finance.

The joint statements are communications pieces, as well as indicators of policy direction and intent, delivered usually at the UNFCCC COP. The 2024 statement was made as part of a side event at COP29 in Baku. The presence of the four funds in their Climate Funds Pavillion — a space in the delegate-only COP blue zone for events and meetings — has been a key feature of the public-facing collaboration between the funds. The draft action plan highlighted their continued joint efforts to build the profile of their work.

They have also prioritised various joint publications and knowledge products to showcase lessons learnt from the climate projects they finance and to help inform and improve understanding of how the funds operate. In 2020, CIF and GCF published a joint report, 'Synergies between Climate Finance Mechanisms' (CIF and GCF, 2020), while the draft action plan proposed joint knowledge products that would "guide recipients, contributors, and investors to engage with the MCFs". In 2025, the four funds published their first joint results report (GCF et al., 2025) with various high-level statistics on the amount of finance they manage, the

number of countries they operate in, and their impacts across themes of mitigation, adaptation, energy and technology, and nature.

But although these publications may contribute to the funds' goals of demonstrating their own impact, they are not tools to directly increase access to funds for LDCs and SIDS. Their other major product, the Climate Project Explorer,³ is an online joint platform to search project documents and guidance from across the four funds that aims to demonstrate the value of the MCFs to users and share more accessible information about different projects in countries. But, like the new joint reporting publications, this tool contributes mainly to complementarity and coherence goals of illustrating the successes of the funds and only indirectly help improve access to climate finance by locating existing country documentation in one accessible place.

2.3 A significant portfolio of work

The array of complementarity and coherence activities within the joint statements, draft action plan and annual AF and GCF reporting to their boards and the UNFCCC give an overview of where efforts were meant to be prioritised and where they have been prioritised. Where the COP guidance has become more directly worded over the years, shifting from signalling references to operational phrasing in decision texts, the

formalisation of complementarity and coherence as a key work area for the funds has also evolved. In recent years, it has become a term loaded with technical meaning, even though key documents, such as the draft action plan, did not get such formalisation.

The activities in Table 1 aim to enhance access to the funds, whether through capacity-building support to help countries navigate the status quo to access funds, harmonisation of procedures to change the status quo in how countries apply or by developing synergies in programming and development of common databases to address the position of the climate funds among other sources of multilateral finance. Other aspects of complementarity and coherence, such as the GCF's approach to foster it at national level, sit outside these three categories, and could help achieve multiple goals.

The complementarity and coherence umbrella encompasses a large volume of work. The GCF's approach of having an explicit annual update on all these threads is an aid to those wishing to track the different activities being undertaken. Amid increasing calls for actions in this area to expand resource mobilisation and improve in efficiency and impact by funds working together, this kind of reporting may make it easier to increase transparency in terms of actions taking place, and which address questions of improved access and which (with their associated costs and commitments of time and energy) do not.

³ <https://climateprojectexplorer.org/>

3

Country experiences and perspectives on access

This section presents findings drawn from qualitative analysis of the interviews conducted with the representatives of participating LDCs and SIDS, and relevant analysis of the grey literature on complementarity and coherence-related discourses. Here we analyse interviewees' interpretation and understanding of complementarity and coherence, and their perceptions of the extent to which it addresses LDC and SIDS interests and its role in improving access to climate finance. The interviewees supporting this research include representatives from national designated authorities (NDAs), DAEs, fund board members and their LDC and SIDS advisors, fund civil society observer groups, negotiators on relevant topics at the UNFCCC COP, and the funds themselves. We have anonymised all of the respondents we spoke with.

3.1 Interpretations and understanding

The interviews with representatives from LDCs and SIDS illustrated a broadly shared understanding of complementarity and coherence with variations in depth and emphasis. Their understanding was uniformly unaligned with the GCF's application of the term at country level (see Box 2). For interviewees,

'complementarity' means that funds play distinct but mutually reinforcing roles rather than duplicating one another, while 'coherence' means ensuring engagement with multiple funds makes collective sense and is not a complex maze of disconnected process and requirements for climate-vulnerable countries. But they also often used the terms interchangeably, and most of the responses were centred around the meaning associated with coherence. This confusion persists, in line with findings from the second GCF performance review, published by its Independent Evaluation Unit in 2023, which reiterates how the terms are used inconsistently and with uncertainty (GCF IEU, 2023b).

When discussing what the funds sought to achieve through their complementarity and coherence initiatives, there was a perceived gap between stated intent and the practical manifestation of activities. Interviewees from SIDS, LDCs and fund constituencies shared a consistent commentary on how complementarity and coherence appears to have remained superficial and has not (yet) translated into tangible pathways for easier access to climate finance (Interviewees 2, 4, 6 and 7). One of the LDC interviewees said that "the concept has existed in various forms for some time, but has historically focused on communications and branding

rather than on operational processes." Although this may be symptomatic of how communications activities are by definition intended to stand out and be memorable, it also indicates that stakeholders are not recognising the more operational systems-oriented elements of the complementarity and coherence work as significant steps towards easier interactions with the climate funds.

Many noted that such initiatives are a low-priority item in their interactions with governance processes at the COP or at the boards (Interviewees 1, 3 and 7). In negotiation settings, complementarity and coherence surfaces only intermittently and rarely as a distinct agenda item, as discussed in Section 1.1. It also rarely appears in discussions on adaptation; it is perceived instead as a finance matter, and the specificities involved in explaining exactly which aspects of access are challenging are too detailed for the SCF (Interviewee 1). Complementarity and coherence updates are reported at board level, but this rarely generates sustained deliberation in contrast to the pressure to consider different funding applications up for approval (Interviewee 7). Recent exceptions to this include an intervention by the GCF Observer Network of Civil Society, Indigenous Peoples and Local Communities in October 2025, which urged caution at the direction one aspect of complementarity and coherence was taking and additions from board members on the vagueness of the draft action plan (GCF Watch, 2024).

The limited prioritisation of the issue among constituencies engaging with the climate funds indicates a potential structural marginalisation of the complementarity and coherence discussions within the very governance structures responsible for it. This must also be interrelated with this paper's previous point about the extent to which complementarity and coherence communications activities dominate people's understanding of the topic, and so potentially deprioritise it in a long list of policy areas to watch across the climate funds.

3.2 Is complementarity and coherence serving the interests of LDCs and SIDS?

The LDC and SIDS interviewees shared varying views on whether the complementarity and coherence agenda meaningfully serves their needs and interests. But they consistently indicated that, while the concept, as reflected in statements and COP decisions, should have benefitted LDCs and SIDS, in practice, it has not served their interests as promised.

LDC and SIDS interviewees — whether NDAs or associated with roles at the board — noted a persistent gap between the rhetorical commitment

to enhanced access and the operational reality that countries continue to navigate a fragmented, burdensome and often opaque system. One suggestion for this persistence was the sense that competition between the funds and their desire to seek results that are attributable to them have reduced incentives for collaboration (Interviewee 6), particularly with regards to the practical implementation of projects that draw on a range of sources. There was a sense that funders do not see the programme of work as a whole, but rather focus on their own specific part of the whole and their associated systems. Managing multiple systems adds a layer of complexity to NDA, DAE or NIE staff managing different programmes and projects funded by multiple sources.

The responses indicated that the share of managing coherence across funds is gradually shifting to recipient countries as they seek to manage a patchwork of funders on a project-by-project basis. This can impose additional challenges where the national focal persons for different funds may sit in different ministries or sectors, as is often the case. While this national focus may tie in with the GCF's 2018 Framework for the complementarity and coherence work (Pillar 3 – Promotion of coherence at national programming level), it does not quite match the spirit of the joint statements, which are couched in terms of what the funds will do, not what countries must do. The prevalence of country platforms in contemporary discussions on financing climate action at scale could feed into this reorientation of how complementarity and coherence for improved access becomes a national, rather than a fund-level, matter, if pursued without clear equitable partnership agreements between funders and countries.

3.2.1 LDC and SIDS experiences

LDC and SIDS interviewees highlighted **accreditation and reaccreditation** as a key gateway for accessing funds from the AF and GCF. But gaining accreditation is a barrier for many countries as the standards they have to demonstrate alignment with are high. Interviewees described that the system puts applicants through a rigorous accreditation process, which may be suitable for large, well-resourced and capacitated institutions but is demanding for LDC and SIDS public sector bodies.

Highlighting different approaches under complementarity and coherence to address this challenge, interviewees focused primarily on ongoing debates about mutual recognition of accreditation status between funds and recognising functional equivalency of standards across funds. The existing complementarity and coherence initiative for fast-tracking accreditation between the AF and GCF was notable in its absence from these discussions.

Interviewees raised the topic of whether funds should have mutual recognition or apply functional equivalence of each other's standards (see Box 4) as a tool to extend current complementarity and coherence practices that could expand routes to access. This was a live issue at the time of research, given the ongoing decisions that would operationalise the FRLD's modality for direct budget support and access without a new bespoke accreditation system. Couched in this context, a SIDS interviewee discussed their desire for "mutual recognition of accreditation" (Interviewee 5), meaning the principle that a climate fund should recognise another fund's accreditation without requiring a full repeat of the accreditation process. This process is especially welcomed by LDCs and SIDS, for whom individual accreditation procedures can be resource- and capacity-intensive. The existence of multiple, similarly complex but separate processes imposes an additional burden, with some countries forced to prioritise one process over another, potentially missing out on available funding. The SIDS interviewee argued that mutual recognition would allow each fund can retain their systems and procedures while mutually recognising and accepting each other's practices, giving countries a choice of routes for gaining access to many funds, based on their interests and capacities. The FRLD, however, did not adopt this approach, choosing instead the related concept of functional equivalence, which is unidirectional rather than bi- or multi-directional and allows for case-by-case assessment of applicable standards. The AF-GCF fast-track accreditation processes, while more closely aligned to mutual recognition, are not the same.

Interviewees also raised the topic of post-accreditation access to climate finance. LDCs and SIDS still face challenges persist when accessing finance for readiness projects and programmes, even with a national DAE or NIE. They indicated that tools suitable for further simplification include the project templates, reporting documentation and indicators for monitoring. One interviewee suggested that harmonising templates across the funds could ease accessibility issues in such a way that the officer coordinating an application need not become an expert in a multitude of systems (Interviewee 3). Another made a similar argument on the tools and indicators used for reporting, qualifying their suggestion with nuance that, while having a single report for all MCFs may make an officer's load lighter, there is also a danger that indicators may become so high level or devoid of specificity that issues that deeply matter to SIDS and other constituents could get lost in the simplification process (Interviewee 5).

One interviewee who is seeking to use the GCF-GEF LTV to fund climate action in their country mentioned the experience of joint programming initiatives between the climate funds, anticipating that in agreeing to pilot some initiatives, they would be able to work

BOX 4. ACCREDITATION APPROACHES

Functional equivalence describes the idea that one entity accepts that another entity's outcome in some particular standard (such as environment and social safeguarding or fiduciary capacity) achieves the same outcome ('function') as their own, even if the detailed requirements differ on paper. The entity in question can review and unilaterally change the status of this equivalence and review case-by-case examples for equivalence.

Mutual recognition describes the bilateral or multilateral reciprocal agreement that each entity recognises the other entity's standards as automatically acceptable. Operating in both directions, it requires both parties to agree any changes to their mutual recognition.

with the funds to have "easier review and approval" (Interviewee 6). Noting that they had made progress over the four years of engaging on this theme, the interviewee referenced that projects from their pipeline that met the funders LTV criteria are now under development, moving towards implementation. They indicated a gap between their expectations and practical realities in joint programming, raising questions about how the joint partnership is demonstrating complementarity and coherence when they have to get approvals from both fund governance structures (with differing and long approval timelines) and anticipate having to manage the reporting requirements of both funds individually (Interviewee 6). In this case, the onus of is placed on the country, rather than enhanced by the funds finding ways of working together to ease the process for climate-vulnerable countries.

3.2.2 Areas under scrutiny at policy level

Interviewees also raised issues related to ongoing policy debates at board meetings, including concerns around the harmonisation of standards. To have more coherence in fund standards, policies and reporting requirements, interviewees assumed that some kind of harmonisation would be seized upon, notwithstanding the discussion on mutual recognition and functional equivalence above. Expressing concerns around the risk of downward harmonisation or upward convergence of standards, they noted that efforts to streamline processes or make them coherent across the funds may result in convergence towards those that are most complex and burdensome for countries rather than simpler, more country-oriented standards and procedures. There was also concern that, where specific policies like the GCF Indigenous Peoples Policy could be weakened to harmonise with others,

creating a risk to upholding the values enshrined in the policy and weakening its original intent. This sentiment is in step with the statement made by the GCF Observer Network of Civil Society, Indigenous Peoples, and Local Communities in 2025 on the direction being taken by the board articulating concerns that complementarity and coherence could be used as a route to allowing MDBs' less thorough standards on Indigenous Peoples "without a clear decision or Board oversight" (GCF Watch, 2025). The interviewee from the observer group reiterated that the proposed activities were "amorphous" and that the board was being asked for a "blank cheque" for the converging standards (Interviewee 2).

3.3 How can complementarity and coherence improve access to climate finance?

The challenge of how funds should work together is a live debate, given the need to operationalise the NCOG, including in its recognition of the challenges of access and the identification of MCFs in particular to "enhance access and promote effectiveness" (UNFCCC, 2024c). Different stakeholders' perceptions collectively portray complementarity and coherence as an initiative that offers support across LDCs, SIDS and different constituencies but with blurred understandings of expected results. The practical areas in which some progress has been made — such as the GCF-GEF scale-up pilots — is an important step, but the ease of the process is challenged by the operational aspects of managing timelines, multiple governance processes and reporting lines. There is a strong sense that the focus has primarily been on building a brand for the climate funds and communicating their impact and extent, and that this work has yet to deliver the operational transformation that would benefit climate-vulnerable countries and communities.

4

Key findings and recommendations

In Section 1, this paper has reviewed primary documentation on the development of complementarity and coherence as a policy area over the years, assessing how the language has changed since 2014 in COP decision documentation and how AF and GCF policies and practices have changed in response to increasingly operationally minded COP guidance. In Section 2, we explored our discussions with LDC and SIDS representatives on how this technical and theoretical evolution of complementarity and coherence is experienced in practice in countries and the degree to which these efforts are translating into meaningful improvements in access. Exploring our findings from these first two sections, we now focus on four key areas of concern:

- A rhetoric–reality gap, with extensive but uneven effort between and across different initiatives, focusing on accreditation and standards
- The burden on countries to manage complementarity and coherence across the funds, rather than on funds themselves
- A specificity gap between the UNFCCC, fund boards, secretariats and Parties
- The risk of losing sight of the goal of improving access as efforts are balanced between this and scaling finance.

4.1 Extensive but uneven efforts (and successes)

The four funds have made marked efforts to codify their work, cumulating with the joint statements and inter-fund working groups that give semi-regular updates on areas of joint work. Yet, rather than identify derived benefits of improved access to climate finance from complementarity and coherence initiatives, our national actor interviewees overwhelmingly identified this work as a communications activity to enhance the positioning of the climate funds.

It is clear, however, from the fund documentation we reviewed and our discussions with AF and GCF interviewees, that this is not how they view complementarity and coherence. Instead, they point to extensive efforts to get multiple misaligned systems to work together, despite significant divergences in business models and standards (Interviewees 8 and 9). Yet most tangible progress against items in

the draft action plan are understandably among the least controversial items that tend to group around communications products: their coordination at COPs, joint reporting publications and (not quite) annual joint statements are low risk for the secretariats of the funds to execute together without significant oversight from their boards.

The funds must make great efforts to ensure the push to harmonise does not become a push to homogenise. There is a narrow line between advancing greater harmonisation between them to simplify processes between them and the ever-present risk of undermining each fund's specific purpose and mandate. The funds were created at different times, in different contexts, and with different objectives, governance structures and boards. As such, maintaining them and their associated variety of access possibilities to meet the different purposes and contexts within countries is crucial. Where board members have the sense that their oversight is being eroded, they have resisted, as evidenced by interventions from board members where complementarity and coherence plans appeared vague or had a concerning scope, as seen in response to the initial presentation of the draft action plan at the 39th meeting of the GCF board (GCF Watch, 2024). The GCF Observer Group's also voiced concerns that harmonisation away from GCF's robust standards could erode vital principles of climate justice and human rights. This potential to undermine the funds' uniqueness demands careful work within secretariats and significant engagement with stakeholders to draw on their experience and perspectives, which itself demands time. The relatively simpler aspects of joint communications may therefore be more straightforward to execute and highlight in reporting.

Recommendation: one way in which to surmount some of the mistrust or tension could be for the climate funds to establish a taskforce of board members, secretariats and observers that can operate at political and technical levels to identify where harmonisation, functional equivalence or mutual recognition could be feasible and understand any risks associated with their different standards. By integrating board members and observers to complement ongoing efforts being made by the secretariats, they can increase their shared understanding of the scope of using complementarity and coherence and where there is appetite for convergence. The taskforce could be the Community of Practice of Direct Access Entities to assess the practicality of their ideas and whether proposed changes address the right barriers to access. This approach may take some careful planning, time commitment and will from members, in addition to their existing workload. Yet there is appetite for both simplification (most explicitly from developing country Parties) and engagement (most explicitly from the Civil Society Organisation Observer group).

4.2 An onus on countries, not on funds

Another area of tension is in the level at which coordination happens for activities that are more directly related to accessing climate finance and who bears the costs (of time, energy and political capital) of that work. The GCF framework assigns an entire pillar to country-level responsibilities for bringing about complementarity and coherence. Bilateral initiatives such as joint programming have sought to increase the volumes of finance reaching countries in a coordinated fashion by working together to identify where each fund's specific mandate can aid the programme. This kind of joint programming certainly has to involve countries and cannot be done behind secretariat doors, but countries cannot and should not bear the burden of managing that coordination.

The recent push in the financing discourse to use country platforms to attract and administer multiple threads of financing behind a single coherent plan is another area where funds must consider this (Gul et al., 2025). The COP29 guidance to ensure that complementarity and coherence would not restrict access to the funds (Decisions 3/CP.29 and 4/CP.29 in UNFCCC, 2025b; Decision 9/CMA.6 in UNFCCC, 2024b) is symptomatic of this concern. If these platforms require countries to manage the brunt of the complexity in achieving complementarity and coherence between funders, their interests, their reporting frameworks and so on, that is evidence of pushing an extremely difficult task that the funds themselves cannot resolve onto climate finance recipients with their often limited capacities to take on that role.

A recent publication unpicks the characteristics of country platforms that are enabling country ownership of the process, as opposed to being a forum that suits the funding partners (LIFE-AR, 2025). Partnership approaches that support these kinds of national platforms for climate action — such as the Taskforce on Access to Climate Finance or the LDC Initiative for Effective Adaptation and Resilience (LIFE-AR) — offer spaces where the country-funder relationship can trial new approaches. The Taskforce on Access to Climate Finance, established ahead of COP26, is trialling joint programming in Uganda and other countries and scaling lessons from those experiences to support the greater streamlining of funding requirements at the fund level. However, progress has been negligible, and greater coordination between funders would alleviate some of that burden on countries (Center for Access to Climate Finance, 2025).

Recommendation: multiple stakeholders have worked hard to establish the Taskforce on Access to Climate Finance, LIFE-AR and other forums. Reinvigorating these efforts to address specific complementarity and

coherence topics would help address this issue without the additional transaction costs of establishing brand new forums.

4.3 Specificity gaps in guidance and governance

One issue emerging from the interviews was whether the governance structure guiding complementarity and coherence has the capacity to be specific enough to meet LDC and SIDS needs. The COP, the four climate fund secretariats and their governing boards have structurally separate roles in the complementarity and coherence system, and all lack the authority to make it operational. The COP can guide and, by convention, chooses not to micromanage, the fund boards. The working groups and officials operating between the four funds can propose activities and implement approved suggestions but cannot make joint structural changes to their operations. The fund boards are in a position to do so, but have only been incrementally able to unpick the web of activities that make complementarity and coherence happen at fund level.⁴ One fund-based interviewee suggested the boards could also engage in some knowledge-sharing exercises to aid their understanding of how complementarity and coherence could work, rather than leaving that all to the secretariats (Interviewee 8).

Interviewees from different stakeholder groups outlined many functional challenges in how communication works between the different bodies (COP, fund boards, secretariats, Parties, NDAs and so on), which creates a lack of clarity in understanding who is responsible for identifying how complementarity and coherence could address the specific challenges LDCs and SIDS face when accessing climate funds. For example, there is a lack of place or moment for raising specificities on access challenges. As seen in the guidance to the funds, there is hesitancy to give funds too much direction on how to address specific issues and the guidance remains fairly high level (Interviewee 5). One interviewee noted that in other negotiation spaces — such as under the ‘adaptation’ or ‘matters relating to LDCs’ agenda items at COPs — forging connections to the financial mechanism is discouraged and identifying detail on particular challenges for accessing finance to implement NAPs (as is of interest to the LEG) is considered too detailed or too niche (Interviewee 1). Yet, an interviewee from a climate fund said that they would “welcome more guidance from the COP” (Interviewee 9).

This highlights a gap in the formal communication structures between Parties and the funds, where

specificity remains elusive. To respond to this gap, individual board members are left to make the case for rather niche policy development areas during board meetings, without the support of the large COP negotiating teams. Board meetings are typically packed with full agendas and extensive documentation and already a significant commitment for LDC and SIDS board members to take on in addition to their regular work. Spaces such as the NAP Expo can allow for more frank conversations but remain outside any formal structure in which Parties and funds are obliged to act on conclusions reached (Interviewee 1). With reduced opportunities for guidance from the COP — as the annual updates from the funds to the COP become biennial from 2026 — these other forums may come under additional pressure to raise Parties’ concerns to the funds and seek accountability for progress against the funds’ complementarity and coherence vision.

Recommendation: to address this specificity gap, the funds could develop a report focused on complementarity and coherence as an access to finance tool to draw together existing studies and workshop reports that speak to specific access challenges and any new challenges that emerge from Parties, as well as DAEs and NIEs. Validated by the previously suggested joint task force of the boards and secretariats, this report could also serve as an input to forums like the LEG, to produce an accountable and fully validated action plan with regular transparent reporting on which access challenges this work is addressing and how it is doing so.

4.4 Losing sight of the goal?

Complementarity and coherence still has a strong opportunity to improve access to climate finance. This workstream remains active, with references to complementarity and coherence appearing in COP decision texts (such as the NCQG) and in fund strategies and policies. Developing countries in particular are placing growing emphasis on this work, especially as pressures on climate finance increase as some developed countries fail to provide their fair share of funding (Pettinotti et al., 2025). Increased transparency and accountability on the activities different funds are undertaking to address LDC and SIDS concerns on access through complementarity and coherence initiatives would help address some of the challenges identified in this paper about the prominence of communications pieces and branding. With the draft action plan never reaching adopted status, there is little consolidated publicly available information to track to understand where the four funds are making or not making progress. This contributes to

⁴ See, for example, GCF’s integration of complementarity and coherence into the new Accreditation Framework, Partnership and Access Strategy, and its updated Readiness Strategy (2024–7); AF’s update to the AF Strategic Results Framework, and its Readiness Strategy 2026–28; and the Draft GEF Programming Strategy on Adaptation to Climate Change for the LDCF and SCCF for the GEF-9 Period (GEF, 2025b).

a concern that complementarity and coherence is being progressed by secretariats with little formal oversight. Increasing transparency with some level of specificity about which access challenges the initiatives are addressing may also unpick some of the challenges in accessing the funds (Robertson, 2024).

Recommendation: where complementarity and coherence initiatives are being increasingly pursued with the goal of tripling climate finance outflows, recalling and recentring the aspects that are primarily about enhancing access to finance will be crucial. Climate-vulnerable countries, especially LDCs and SIDS, must be able to access funds to address their national plans — particularly for adaptation and resilience building initiatives, which rely more heavily on

the public grant based finance the climate funds can provide. Active management of the balance between complementarity and coherence initiatives for accessing and expanding the volume of climate finance will be vital.

The need for climate finance is growing, with the most climate-vulnerable countries experiencing climate impacts, as well as financial shocks and hurdles to delivering finance to the local level where communities are enduring climate change. In harnessing the political will for operationalising NCQG and the spirit of COP30 as the Belem “COP of implementation”, this rich and underpublicised stream of work on complementarity and coherence must not neglect the crucial aspect of access.

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Accessing climate finance remains slow, complex and resource intensive, with disproportionate burdens on Least Developed Countries (LDCs) and Small Island Developing States (SIDS). In response, the Green Climate Fund, Global Environment Facility, Adaptation Fund and other major climate funds are advancing an agenda of 'complementarity and coherence' aimed at enhancing access for countries, better aligning their operations and reducing duplication. This paper traces how complementarity and coherence has evolved through United Nations Framework Convention on Climate Change guidance and fund-level implementation. Drawing on document analysis and interviews, it examines whether these efforts are translating into meaningful improvements in access for LDCs and SIDS or risk introducing new forms of complexity.

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