Policy brief

Enhancing access to climate finance for Small Island Developing States

Considerations for the Green Climate Fund (GCF) Board

Emily Wilkinson, Pia Treichel and Michai Robertson

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Key messages

- Small Island Developing States (SIDS) value the GCF and the role it plays in providing climate finance, particularly because of eligibility challenges with other sources of finance.
- As part of the international climate regime, the GCF has a legally binding mandate to ensure all SIDS are eligible, have effective representation and are prioritised for access to climate finance and readiness support.
- Evidence shows, however, that the GCF has been slow to fulfil this mandate. One reason is unnecessarily complex and onerous GCF processes that do not fully reflect the special circumstances and constraints facing SIDS. This is exacerbated by insufficient awareness and knowledge of the SIDS context within the GCF.
- Some SIDS have been able to overcome these barriers by leveraging strong relationships with GCF staff. But the overall story is a negative one, with SIDS only receiving 10% of total funds allocated.
- To rectify this, the GCF should revisit the Simplified Approval Process, create a minimum country funding allocation, increase its regional presence, implement new operational modalities for readiness support, and ensure the Secretariat has appropriate geographical balance and culture.
- A combination of these changes will enable the GCF to better cater for one of the most vulnerable groups of countries.

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Acronyms

AIS	Atlantic, Indian Ocean and South China Sea
DAE	Direct Access Entity
GCF	Green Climate Fund
iTAP	Independent Technical Advisory Panel
LDC	Least Developed Country
NAP	National adaptation plan
NDA	National Designated Authority
SAP	Simplified Approval Process
SIDS	Small Island Developing States
STAR	System for Transparent Allocation of Resources

1 Introduction

As the world's largest multilateral climate fund, the Green Climate Fund (GCF) forms a crucial part of the global climate finance architecture. As an international entity entrusted with operating the global climate regime's financial mechanism, the GCF has a legally binding mandate to ensure that Small Island Developing States (SIDS) are eligible for access. It also has a mandate to prioritise SIDS as it seeks to ensure efficient access and enhanced readiness support (Article 9.9 of the Paris Agreement, UNFCCC, 2015). The GCF must also take into account the priorities and needs of SIDS in providing finance (Article 9.4 of the Paris Agreement, UNFCCC, 2015).

Evidence shows, however, that access for SIDS to GCF funding has been slow and that this group of vulnerable countries has not been prioritised. The GCF's own *Independent evaluation of the relevance and effectiveness of the Green Climate Fund's investments in Small Island Developing States* (Chase et al., 2020) highlighted serious shortcomings. Three years later, in a context where the GCF has a new Executive Director and a new Strategic Plan (2024–2027), it is more important than ever to highlight the reasons why the GCF is not adequately serving SIDS and to make recommendations to help rectify this.

SIDS are particularly vulnerable to extreme weather events and slow-onset processes associated with climate change, including cyclones and hurricanes, changing temperature and rainfall patterns (bringing more intense flooding and drought), reduced availability of freshwater resources, sea level rise, coastal inundation and coral reef loss. They have low capacity to respond to these changes because of their unique combination of circumstances and constraints, which include small land area, small economies, small population, geographical remoteness, inherent vulnerabilities and high transaction/operational costs (Bishop et al., 2021). Given this vulnerability, SIDS have long been active and sophisticated agents in the international climate response, advocating for increased international support for climate action (Ourbak and Magnan, 2017; Corbett et al., 2021). But this has not resulted in them receiving higher levels of finance for climate resilience compared with other groups of countries (Wilkinson et al., 2023).

To date, SIDS have received $1.4 billion in GCF funding ($3.5 billion in total including co-financing) for 59 approved projects, including multi-regional. This is equivalent to 10% of total GCF funds allocated, less than the totals for African countries and for Least Developed Countries (LDCs).[1,2] The GCF is set to grow – with the vision of managing $50 billion by 2030 – but without major governance and policy reforms to improve access for SIDS, their share of the pie is likely to shrink. Across the board, SIDS have faced huge challenges in accreditation, developing concept notes, getting projects approved and even in getting funds disbursed. The process is slow and overly bureaucratic from start to finish, and this is to the detriment of the countries who most need the GCF: SIDS. Moreover, the GCF Independent Evaluation Unit has highlighted that transaction costs are higher in SIDS compared to non-SIDS countries (see Table 1).

Table 1 Examples of SIDS circumstances and resulting higher transaction costs

SIDS circumstances	Resulting higher transaction cost
Geographical remoteness	Increased transport costs
Populations spread over vast distances of ocean	Logistical challenges (time, expense and uncertainty)
Small populations	Virtually no economies of scale

Source: Chase et al., 2020.

This briefing draws on research findings from an in-depth study conducted by the Resilient and Sustainable Islands Initiative (RESI) across the three SIDS regions – the Caribbean; the Pacific; the Atlantic, Indian Ocean and South China Sea (AIS) – from March to September 2023.[3] The study included a survey of 17 SIDS respondents and 21 key informant interviews covering each of the three major subgroupings of SIDS, regional entities and key GCF Secretariat staff. It also included a virtual roundtable with Caribbean Community (CARICOM) member states on 24 May 2023, and an in-person roundtable in New York on 22 September, held during the UN General Assembly High-level Week.

Common lessons from the experiences of SIDS are summarised here, alongside a set of guidelines for consideration by the GCF Board.

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1 'LDCs' is a category used across the UN system and in much development literature: http://www.un.org/development/desa/dpad/least-developed-country-category.html.
In this report, the authors would like to acknowledge current debates which question the use of this terminology and its ahistorical framing. They seek to challenge the power relationships and assumptions inherent in ideas about progress and development. Although in this instance we employ the term 'LDCs' to situate this report within the current literature, we will continue interrogating the appropriateness of the term and working with our partners to develop more appropriate language and terminology.

2 As of 12 September 2023. As well as SIDS, the GCF has singled out two other groups as due for additional support and specialised attention because of their particular vulnerability: LDCs and African countries. Out of $35.51 billion total financing (GCF and co-financing), LDCs have received $11.5 billion for 96 approved projects including multi-regional, and countries in Africa have received $18 billion for 92 approved projects including multi-regional. Note that there are significant overlaps between these groups.

3 Full results from the study will be published in late 2023 in a peer reviewed journal.

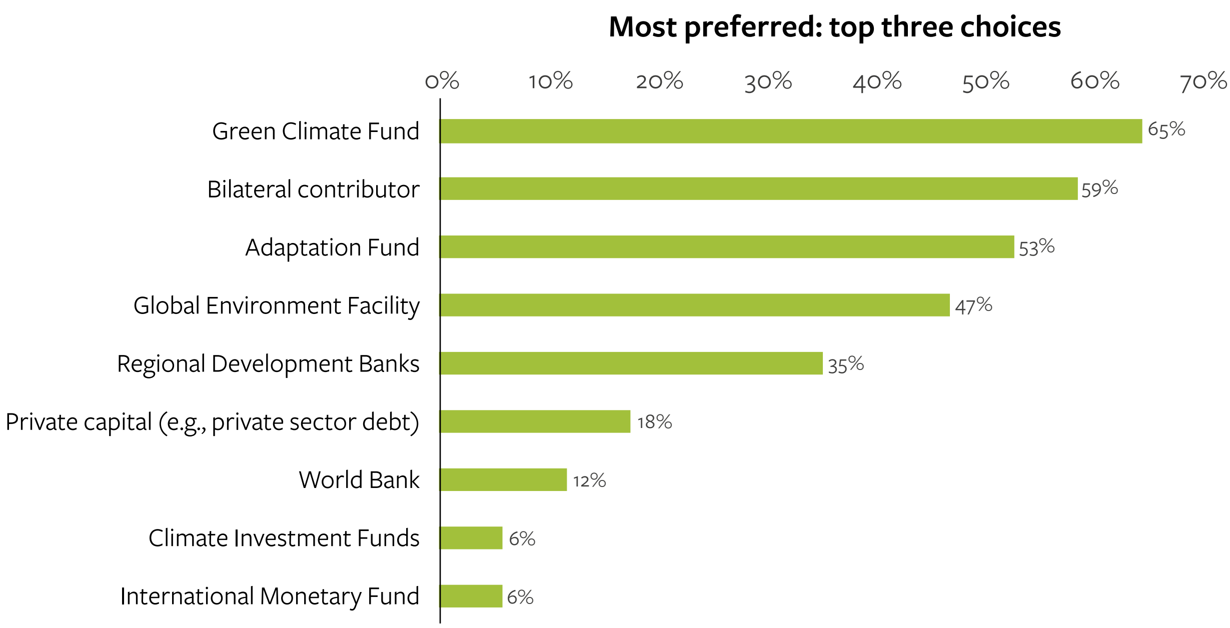
2 Behind the numbers: GCF challenges for SIDS

2.1 What SIDS value about the GCF

SIDS value the scale of funding that is available from the GCF and the emphasis on country ownership. The GCF is broadly seen as being open to funding proposals based on national priorities. The positive aspects of the GCF specifically identified by SIDS were the readiness support and project funding, followed by the availability of higher volumes of finance (compared with other climate funds or other international financial institutions), and the ability to use national and regional partners via direct access.[4] More broadly, SIDS have often stated their appreciation of the GCF's general eligibility criteria, as well as the availability of grant-based and/or highly concessional finance (see Figure 1).

Those SIDS that had had success in accessing finance from the GCF pointed to very specific and idiosyncratic contributing factors. These included prior experience of application processes for

Figure 1 SIDS preferred climate finance provider



Note: Multiple choices were allowed; the cumulative total % of choices could be more than 100%.

4 These factors were assessed by 17 SIDS respondents in an ODI survey on access to climate finance.

the GCF and other international climate funds, and knowledge and experience of the accredited entity, as well as strong relationships with GCF staff and good coordination between all actors (from GCF staff to National Designated Authorities, Direct Access Entities, government departments, delivery partners, and consultants and champions in the region).

These factors matter because the GCF project approval process is perceived to be much tougher and more prolonged than for other funds, including the Adaptation Fund and the Global Environment Facility. SIDS noted the benefits of the Global Environment Facility using the STAR model for allocation and the Adaptation Fund using country caps, which give countries greater predictability compared with the GCF's 'first-come-first-served' approach. The ad hoc nature of funding approvals under the GCF makes predictable climate programming unnecessarily challenging for SIDS. However, SIDS continue to want to work with the GCF because of the Fund's ongoing focus on country priorities and its potential to deliver the greater funding that SIDS so desperately need, which together ensure that countries can direct increased funding to the programmes they determine as most in need.

2.2 Readiness support challenges

SIDS particularly value the GCF Readiness Programme, which began operating in 2015 (see Figure 2). Up to $1 million is available per country per year, which SIDS have used to train staff, prepare concept notes, build the capacity of their National Designated Authority and executing agencies, strengthen the enabling environment (policies and institutions), build capacity for accreditation (including to meet fiduciary standards), undertake stakeholder engagement activities, and raise awareness of the GCF nationally (see Figure 3). An additional $3 million is available per country to support adaptation planning.

Figure 2 Improvement in SIDS access to GCF funding as a result of readiness support

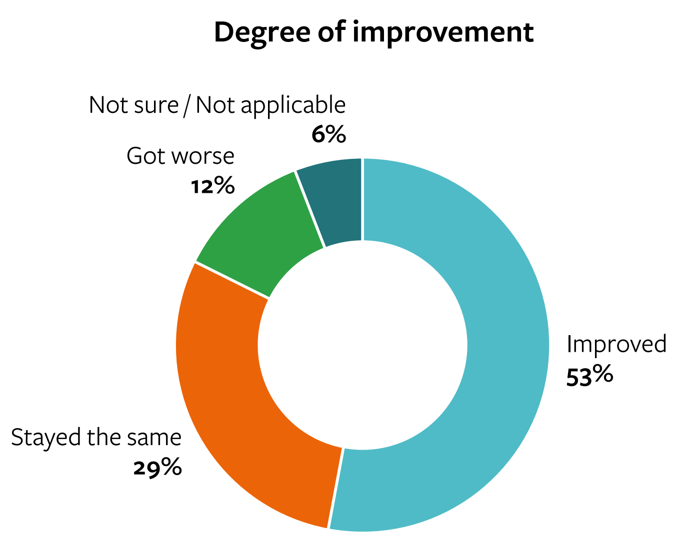
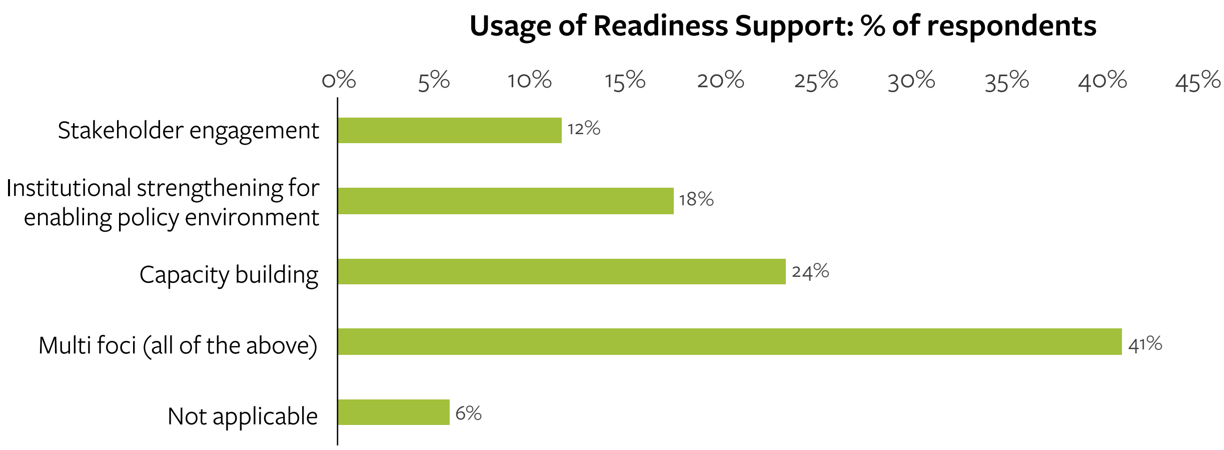


Figure 3 SIDS use of readiness support



Note: Totals to more than 100% due to rounding.

Readiness support is seen by SIDS to work best when it can be accessed predictably and consistently to build the country's long-term capacity to access and manage climate finance – i.e. not implemented as a set of discrete initiatives with their own set of starting points. Developing a readiness strategy is key.

> '[*Readiness*] *has certainly helped us with respect to building an understanding of the overall process, being in a position to have prepared submissions to go forward* [*and*] *more importantly, engaging stakeholders in the overall process.*' Caribbean interviewee 1.
>
> '*So readiness is super important. And we actually love the readiness modality, in that it's automatically available, right? There's no fighting or competition, we get a million dollars a year.*' Pacific interviewee 3.

However, there are constraints that readiness support cannot overcome in SIDS, such as the costs of implementing climate adaptation projects. For example, Pacific SIDS noted that they may only have one ship to service many islands, making the costs of transporting materials extremely high (Corbett, 2023). This is a fixed cost that readiness cannot help with. However, according to one regional Direct Access Entity (DAE), the GCF is increasingly using 'beneficiary metrics' to evaluate proposals – i.e. assessing the costs of a project in relation to per person benefits.

2.3 Accreditation challenges

Direct access is important to SIDS, and indeed to all countries in the so-called 'Global South'. Of the SIDS surveyed for this study, 24% said that using a DAE was their first preference, and another 13% selected DAE as their second choice. When working with an International Accredited Entity, SIDS prefer regional entities such as the Caribbean Community Climate Change

Centre, the Caribbean Development Bank, the Secretariat of the Pacific Community and the Secretariat of the Pacific Regional Environment Programme, as well as entities with a country presence – UNDP and the Asian Development Bank were given as examples (see Figure 4).

The direct access route allows SIDS to have full ownership of the process of applying for GCF funds. This reduces dependence on external agencies, builds their longer-term capacity to scrutinise projects and develop appropriate policies and procedures, and increases funds flowing into the country (with benefits for foreign exchange, employment and faster implementation). Interviewees concurred that SIDS have long struggled with the 'fly in, fly out consultant' model of technical assistance, in which costs are high but technical expertise leaves when the consultancy is finished. Interviewees noted that the International Accredited Entity route can replicate these problems.

The process of accreditation is, however, extremely difficult for SIDS. The GCF's very high fiduciary standards do not reflect the reality of the size of SIDS economies or the size of projects that they will want to implement. They report that being accredited as a small or micro entity is only slightly easier than as a medium or large entity – it is still enormously difficult, and the processes are premised on the need to manage much larger flows of money. For example, the GCF requires DAEs to have an internal auditing function, which is an unreasonably high expectation for many agencies in SIDS that have less than 20 full-time employees. Similarly, another interviewee for this study talked about the accreditation standards requiring their national development bank to maintain an international credit rating, despite only operating within the country.

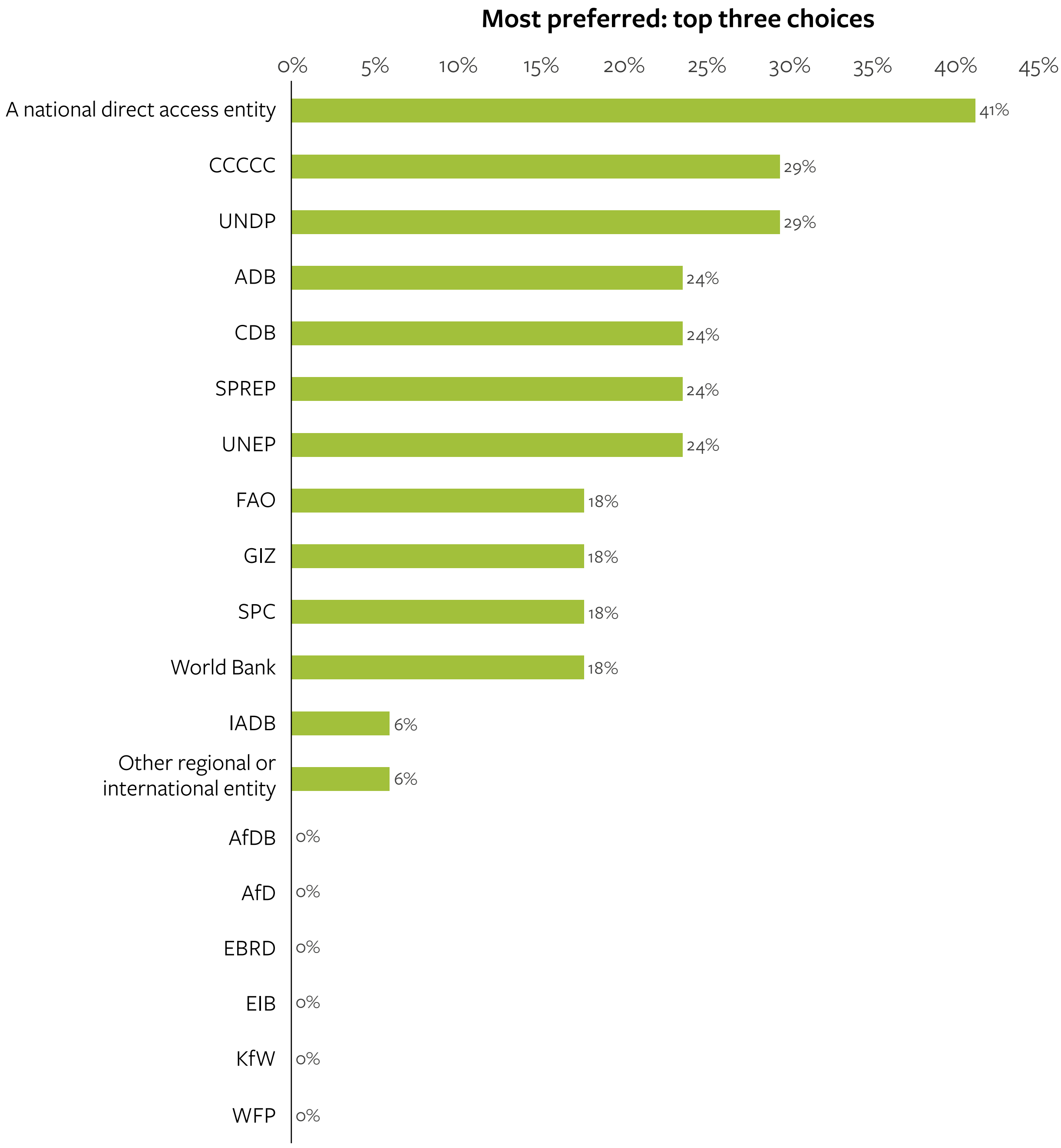
Those SIDS working on accreditation also face very long delays. One focal point noted that their country had submitted a proposal three years ago and had received no feedback since then.

The GCF has a backlog of accreditation applications (reported by over 200 entities) and the Board has prioritised re-accreditation of existing entities. The Secretariat has very limited capacity to progress accreditation applications for new entities. A pilot Project-specific Assessment Approach has just been launched to reduce that burden and make it easier for SIDS and other vulnerable countries to become accredited and improve their access to finance. However, this approach has yet to be used.

2.4 Proposal development and approval challenges

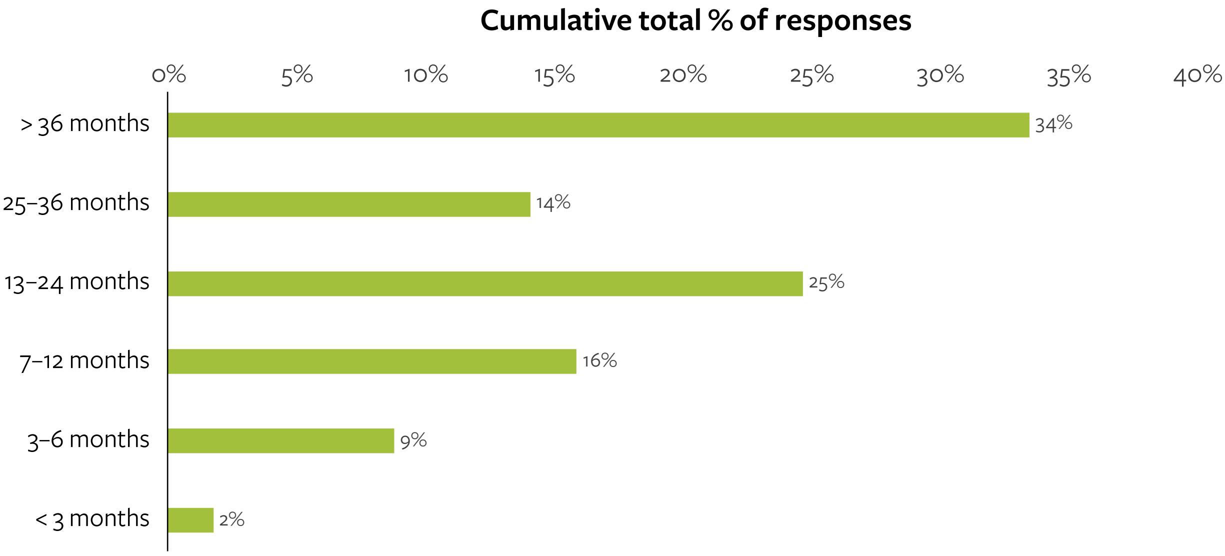
SIDS face severe challenges and delays in the proposal development and approval process. In the access to finance survey, SIDS reported that close to half of all projects had been in the pipeline for more than two years, and 34% of projects for more than three years (see Figure 5). Every step of the process is slow and overly bureaucratic, from the processing of concept notes through to approval and disbursement of funds. These findings match those of the most recent evaluation completed by the GCF Independent Evaluation Unit, which found that countries across the board find the GCF project approval processes 'bureaucratic, lengthy, inconsistent and non-transparent' (Independent Evaluation Unit, 2023, page 76). These challenges are particularly egregious for SIDS who are typically asking for smaller amounts of money and have a dramatic and pressing need for finance.

Figure 4 SIDS preferred accredited entity (top three choices)



Note: CCCCC, Caribbean Community Climate Change Centre; UNDP, United Nations Development Programme; ADB, Asian Development Bank; CDB, Caribbean Development Bank; SPREP, Secretariat of the Pacific Regional Environment Programme; UNEP, United Nations Environment Programme; FAO, Food and Agriculture Organization of the United Nations; GIZ, Deutsche Gesellschaft für Internationale Zusammenarbeit; SPC, Secretariat of the Pacific Community; IADB, Inter-American Development Bank; AfDB, African Development Bank; AfD, Agence Française de Développement; EBRD, European Bank for Reconstruction and Development; EIB, European Investment Bank; KfW, Kreditanstalt für Wiederaufbau; WFP, World Food Programme.

Figure 5 Total time SIDS projects have been in the pipeline



The primary challenge in project approval identified by survey respondents was in meeting the technical requirements, with 53% of respondents identifying this as difficult or extremely difficult. Other challenges highlighted were projects being deemed not bankable enough, delays in processing the concept note, delays in processing the project proposal, communications difficulties with the independent Technical Advisory Panel (iTAP), and relationship difficulties with the accredited entity.

The downscaled data requirements and the need to demonstate a 'climate rationale'[5] are overly onerous for SIDS because of existing data gaps and challenges in these countries. The climate rationale concept requires countries to demonstrate that an issue is climate-related (and not purely a development challenge), and that the adaptation project will help with the 'climate' issue. To meet this requirement, external consultants often need to be brought in to do more studies, adding more time and cost to project development. Some of the questions and requests to provide more data and demonstrate 'additionality' come from the iTAP, a panel of independent experts who review the proposals. Feedback from both the Secretariat and the iTAP is often framed as technical standards that do not reflect the lived realities of small island states.

> *'It was yet definitely more than 36 months because we didn't have enough data and they asked us to collect more. We had to spend one year just collecting data with the accredited entity … to prove that the coastal changes and erosion taking place were a result of climate change. I think in total it cost $1 million extra to get this data.'* AIS interviewee 1.

5 GCF staff explained that the climate rationale concept has not been used since the start of 2023, but none of the SIDS interviewees have seen that change filter through yet.

Moreover, as SIDS have repeatedly emphasised over more than three decades of activism in international organisations (Corbett et al., 2021), their vulnerability to external shocks – including climate change – is their core development challenge. It is impossible to disentangle this from other development challenges. As one interviewee put it, 'all water security projects in SIDS are essentially about climate'.

Another problem SIDS face is the lack of transparency over which projects qualify for grant finance. One regional DAE with several SIDS projects in the pipeline, said the GCF is increasingly demanding elements of proposals be funded through loans. This doesn't make sense, as the renewable energy projects in question will reduce dependency on imports and build resilience, but not generate revenues which can be used to pay back loans. Also, many DAEs are not accredited to provide loans and there is no mechanism for bringing in co-DAEs that can do this.

Overall, a critical issue for SIDS is the lack of certainty. The NDA does not know if, or when, projects will be starting. This makes it difficult to plan and execute country programmes that include transformational climate action and to leverage additional co-financing from the private sector. One of the interviewees suggested that if SIDS were allocated \$10–20 million per country per year (i.e. \$40–80 million per replenishment period), that would allow their governments to strategically implement a programme of actions to adapt to climate change.

> *'SIDS aren't asking for more pie at the table, they're just asking for a leg up to the table ... The problem is that nobody saves pie for SIDS. So to the end of the replenishment period, there's very little pie left. SIDS [would] like certainty that as they're getting ready, there'll be pie there left for them.'* Pacific interviewee 7.

SIDS are gradually learning how to navigate GCF procedures, but the costs – and opportunity costs – of developing proposals that take three or more years before they can even begin to be implemented is too long for those on the frontlines of climate change to wait. SIDS have been identified as one of the groups of countries who are particularly vulnerable to climate change, and the GCF's approaches should reflect their pressing needs.

3 Five policy entry points and recommendations for the GCF Board

The full report from this study points to a longer list of considerations, policy entry points and recommendations for the GCF Board and the Secretariat based on the experiences of SIDS. For the roundtable in New York on 22 September 2023, we focussed on five policy entry points and specific recommendations, a majority of which are on the agenda for the next GCF Board meeting (23–25 October 2023).

3.1 Minimum country funding allocation

This study finds the lack of predictability in GCF funding is one of the greatest challenges for SIDS. The GCF approach of allocating funding on a first come, first served basis favours countries and agencies that are larger and more familiar with GCF systems. While the 50% minimum adaptation funding for SIDS, countries in Africa and LDCs helps to some extent, many SIDS are yet to have a national-level project approved.[6] A minimum allocation per country would help to reduce this uncertainty for SIDS, while not restricting countries from also applying to the open category. Other funds, including the Asian Development Fund and the Global Environment Facility, have special allocations for SIDS.[7] A minimum GCF annual allocation for SIDS of, for example, $10 million would not materially affect other countries.

While this is not on the agenda for the next GCF Board meeting, improving funding predictability is a priority for SIDS.

RECOMMENDATION: Create a minimum funding allocation per country for SIDS. Like the minimum allocation for adaptation, this would be a proportion of all funding available, so that SIDS are not disadvantaged by the GCF's first come, first served approach and to ensure predictable funding for this particularly vulnerable group of countries.

6 More SIDS participate in multi-country projects. However, interviewees for this research were consistent in noting that multi-country projects were more difficult and yielded fewer benefits than national-level (single country) projects.

7 An 'economic vulnerability premium' has been created for SIDS eligible for the Asian Development Fund, providing additional concessional finance to help mitigate structural vulnerabilities

3.2 Regional presence

SIDS face a number of barriers because of poor understanding of their specific contexts. Each of these barriers to access could be overcome through better familiarity with SIDS contexts. Pacific SIDS in particular value support from the GCF Regional Desk for Asia Pacific because it is staffed by several Pacific islanders, and this helps when it comes to project development. But SIDS still have to deal with other parts of the Secretariat that are unfamiliar with SIDS-specific contexts. Regional offices with devolved responsibilities are common in other international organisations, and they are needed here too, because they can assist with things like developing regional cost estimates to fairly reflect the true costs of doing business in SIDS.

In 2020/2021, the GCF looked into needs and options for establishing a GCF regional presence. A feasibility study 'to further examine options for a GCF regional presence' is underway and will be submitted to the next Board meeting for decision on the matter. We venture that an increased regional presence would likely recommend bespoke approval processes for specific groups of clients, such as SIDS.

RECOMMENDATION: The GCF needs to introduce a physical presence in each SIDS region, among other regions, so that staff will more likely have lived experience of SIDS realities and understand the costs, capacities and constraints of SIDS in their climate action endeavours. The model of regional offices with decentralised programming and decision making based on consultation seems best aligned with the views of SIDS on this matter.

3.3 Secretariat geographical balance and culture

The GCF's existing processes work on the basis of global cost averages as a means of delivering global equity. While noble, this approach does not reflect the lived realities and very high costs (absolute and per capita) in many SIDS. Likewise, other realities of climate programming in SIDS would be better understood by a Secretariat dedicated to this high-risk group. To ensure fair and appropriate assumptions about the needs and costs of climate action in SIDS, proactive steps need to be taken. This could include enhancing GCF human resources policies and processes to ensure that the Fund's Secretariat staff, Accreditation Panel, iTAP and Board members have a solid understanding of realities in SIDS.

RECOMMENDATION: Enhance GCF human resource policies and processes, including affirmative action on geographical balance with a focus on ensuring experts from SIDS are recruited, and inclusion of SIDS-focused key performance indicators in the annual Secretariat work programme to enhance programming and the accreditation process. More regular field visits for staff involved in review and approval of project proposals and entities is also recommended, but less critical if a regional presence and decentralised programming is established.

3.4 New operational modalities for readiness support

SIDS have found readiness funding to be highly useful in building their capacity to access and prepare for climate finance. Improving the predictability of this funding would allow SIDS and other vulnerable countries to better plan for and implement new projects. In July 2023, the GCF proposed several revised and new operational modalities for the Readiness Programme 2024–2027, including:

- multiyear, harmonised programming: 'each developing country will have access to readiness resources of up to $4 million over the four-year GCF-2 programming cycle (2024 to 2027)', subject to the submission of a Readiness Needs Assessment
- additional funding for national adaptation plans (NAPs): 'to enhance the current NAP modality by allocating a subsequent $3 million starting on the date of approval of the last tranche of funding under the current NAP modality'
- support for LDCs and SIDS: 'in addition to the country support modality available to all developing countries – a supplementary support modality for all LDCs and SIDS which identify a need for support'; 'The funding envelope would provide up to $80,000 per year over the four-year GCF-2 programming cycle 2024 to 2027.'
- direct access: 'it is proposed that each DAE have access to up to $250,000 per year, or $1 million over the four-year GCF-2 programming cycle (2024 to 2027). This would be separate from and complementary to the PPF [Project Preparation Facility] funding envelope and separate from the country support funding under the Readiness Programme.'

RECOMMENDATION: The GCF Board should approve the four proposed updates to the Readiness Programme for 2024–2027, as they are aligned with SIDS draft guidance to the GCF for at least the last two Conferences of the Parties, as well as with interviewee evidence.

3.5 Updated Simplified Approval Process

The GCF Simplified Approval Process (SAP) was designed to simplify and speed up the experience for smaller projects, such as many that are implemented in SIDS. However, the GCF's own Independent Evaluation Unit found that using the SAP has done little to reduce either the procedural burden or the timeframe for projects. Similarly, the Project-specific Assessment Approach is designed to reduce the accreditation burden and prioritises countries and partners that have been underserved by the GCF to date.

The Secretariat updated the SAP in response to this evaluation and based on consultations they had with stakeholders. After a few years of back and forth, the Board adopted the updated SAP in 2022. The GCF Board Member for SIDS at the time stated their disappointment with the updated SAP, on the basis that the reforms did not go deep enough in simplifying the process. They suggested that the SAP policy would only begin to truly be simplified when the Secretariat undertook a policy mapping exercise to identify where the overall GCF business model and policy framework could be further simplified. This policy mapping can then be used to inform review of the SAP.

RECOMMENDATION: Conduct a detailed policy mapping of the overall GCF business model to identify key areas of reform, and then undertake a review of the SAP.

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203 Blackfriars Road
London SE1 8NJ

+44 (0)20 7922 0300
info@odi.org

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