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# Response matrix for Water security Sectoral Guide

## Summary

The accompanying sectoral guide was released for consultation in November 2021 and the consultation was open until the end of March 2022 (extended) to provide sufficient time for stakeholder to provide inputs. Consultation was open to the Board, advisers, observers, NDAs, Direct and International Access Entities, Civil society, Private sector representatives, Partner institutions and sector experts. The Secretariat received more than 420 specific comments and feedback on this draft. These and the responses by the Secretariat sector experts on how these comments were considered in the updated version of the sector guide is contained in this document.

This feedback and response matrix has been prepared for information purposes only to share the different comments received by the organizations that submitted feedback to the GCF in response to the public consultation of the "Water security Sectoral Guide" draft for consultation version 1.

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

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

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

For further inquiries regarding this feedback and response matrix please contact us via:  
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Sectoral Guide Section	Feedback (verbatim)	Organization	Response from GCF/DMA sector specialists
General	Logo top right corner suggest two males (sleeves implies western dress) controlling water. Request GCF considers a more gender neutral, south-biased logo.	UK FCDO	The Guide uses the GCF template
General	As the executive summary repeats key elements of the introduction and development, we will address issues in the rest of the report. Our comments hold also true for the executive summary (e.g. definition of the water sector, comments on the table, etc.)	Germany BMZ	The executive summary follows the GCF template
General	The sectoral guidelines on water are comprehensive and well articulated, even if it is sometimes challenging to identify the GCF's geographical (regional/local, urban/rural) and institutional targets envisaged for the different actions.	State Secretariat for Economic Affairs SECO Development cooperation, Infrastructure Financing	Thank you for your comment. The GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, climate-resilient pathways. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America.
General	<p>As the International Committee of the Red Cross (ICRC) has been witnessing firsthand, countries in situations of fragility, conflict and violence (FCV) very often experience severe water scarcity and high vulnerability and low readiness to climate change. These countries are characterized by weak institutions and governance and by compromised social systems. FCV countries struggle to implement the Sustainable Development Goals (SDGs). The expertise of the ICRC and the literature on the subject of 'how people experience conflict and climate risks in combination, and how they cope and adapt' are articulated in the report When rain turns to dust. <b>For FCV countries it is crucial to find ways to address water insecurity, giving a support adapted to such settings and facilitating access to funds which could sustain that specific support. Therefore, in its strategic and sectoral plans, we suggest that GCF considers an approach tailored to those countries.</b></p> <p>NOTE: It is important to remind that FCV countries are not necessarily listed under the definition of Least Developed Countries (LDC) or Small Island Developing Countries (SIDC) and do not have necessarily the same issues.</p>	International Committee of the Red Cross (ICRC)	The GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, climate-resilient pathways. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. Please view Section 6 GCF Investment Criteria. The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America.
General	<p>In the following two sections we will give a) technical and b) financing-focused comments on the guide. Since the guide is just one out of several ones and water is an important crosscutting element when it comes to climate, it would be good to have – not necessarily for comments but for information – the other guides.</p> <p>A) Technical comments</p> <ul style="list-style-type: none"> <li>• Throughout the whole guide, we notice how crucial is the role of water management and we agree on it. We would also make more evident the role of 'resilient water services', to respond to climate- and conflict-related hazards. We would do it under: <ul style="list-style-type: none"> <li>o "Global adaptation and mitigation potential: where does the sector need to be?" (p.12-15)</li> <li>o "Two paradigm shifting pathways in the water sector" (p.18). Here, 'resilient water services' could be under "[w]ater infrastructure systems" or "[m]itigating water-related hazards" (p. 21-22).</li> <li>o On p. 23, when the guide says that "[i]nvestment programmes need to build long term capacity of local actors, rather than short-term delivery efficiency", it could be good to add 'resilience' in the parameters of these long term capacity of local actors.</li> </ul> </li> </ul> <p>The concept of 'resilient water services' is pivotal in the recent (2021) World Bank, ICRC and UNICEF's report. The report gives also practical examples on how to strengthen resilience.</p>	International Committee of the Red Cross (ICRC)	Thank you for your comment. The GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, climate-resilient pathways. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, which in turn enhances resilience of water infrastructure, systems, and services.

General	Throughout the document, it is not always clear how words like 'resilience', 'water', 'infrastructure' and 'service' are combined. Being pivotal concepts of the guide, there should not be room for different understanding. On page 6, "resilient infrastructure" is mentioned while we usually recommend using "resilient system" or "resilient service" (which includes 'infrastructure' as much as 'staff' and 'consumables'). On p.7 it is mentioned that "[t]he vision for a paradigm shift in water security is to secure water resilience and water services under conditions of increased climate change impacts." From our point of view, the service should be resilient, not the water: such sentence would be clearer if it would be rephrased saying "water resilient services"	International Committee of the Red Cross (ICRC)	Resilient water infrastructure and resilient water services are internationally recognised terms in the water sector. GCF is promoting the concept of treating water as a new asset class that develop, finance, design, enhance through credit enhancement and acceptable revenue stream in line with ESG, Paris agreement and SDGs. This information now included.
General	While resilience of the water service is well covered – and it is mainly understood as 'resilience to climate hazard' – it would be important to frame resilience considering the wider spectrum of hazards that may be present, including conflict related hazard. Therefore, we propose to consider mentioning the 'all-hazard approach'.	International Committee of the Red Cross (ICRC)	The mandate of GCF is to ensure projects are resilient to climatic extremes and mitigate emissions.
General	Issues like poor water governance, divisions and tensions among groups or with neighboring countries make the full and country-wide implementation of Integrated Water Resource Management extremely complicated in FCV countries.	International Committee of the Red Cross (ICRC)	The mandate of GCF is to ensure projects are resilient to climatic extremes and mitigate emissions.
General	<p>We understand that a Technical Annex to these guidelines will focus on floods and WASH. I would suggest that WASH merits its own technical annex, noting it has an inherent association with water security that extends beyond 'flood' and 'drought'. I also make the case for Climate Resilient WASH to be considered as the 3rd paradigm shift pathway – this would greatly strengthen the guideline.</p> <p>Another generic point refers to the limited reference to the importance of addressing vulnerability and gender. This is picked up in several of the comments that follow.</p> <p>The cross sectoral issues listed in Table ES 1 against the Health and Wellbeing guide refer to water supply and sanitation. These are not mentioned in the version of Table ES 1 that appears in the Health and Wellbeing guide. The table in the Health and Wellbeing guide instead states that 'safe drinking water supply and improved sanitation for health' is addressed by the water security guide. This inconsistency, which should be addressed, may help explain why WASH seems to have fallen between the 'gap'.</p> <p>Finally, can the guideline be reviewed to reduce the amount of climate related jargon that will otherwise limit its accessibility.</p>	UK FCDO	Thank you. The water sector guide focus on the paradigm shifting pathways and the role of GCF in financing these pathways. . The GCF Sectoral Guide series supports the progressive work programme approved for 2020-2023 providing evidence-based information for impactful projects in priority investment areas and giving further momentum to making GCF operations more efficient and more effective. The focus of this sectoral guide is a paradigm shift in the two pathways of climate mitigation and climate adaptation. Regarding terminology, GCF's mandate is to action the Paris Agreement. Please view Section 6 GCF Investment Criteria.
General	<p>It is important that the guide clearly specifies that desalination (particularly for SIDs) must be part of an integrated water resources management logic.</p> <p>The consideration of all "non-conventional" resources must be analysed according to an integrated approach that compares all the available alternatives and that takes into account, of course, the carbon footprint and other criteria (for information, the AFD is in the process of defining an intervention approach for desalination).</p> <p>ReUse is reported in path 2 while desalination is reported in path 1 (support desalination using renewable energie).</p>	AFD	The sectoral guide guides investments towards the two paradigm-shifting pathways. Concept notes are welcome on water projects that mitigate emissions and/or adapt to climate change, while providing numerous co-benefits (cross cutting projects). AE's are welcome to submit concept notes on projects that utilise renewable energy-powered desalination to improve resilient and reduce Co2 emissions.
General	Is there any particular reason why water storage has been excluded from the document?	ADB	Thank you for your comments, water storages impleid in infrastrucre, where we propote the implementation of a well-managed mix and integration of the Grey-Green Infrastructure to enhance the resilience of societies to climate change (Drought and Flooding) and mitigate energy-intensive grey infrastructure and increasing storage of carbon through promoting, designing and financing integrated Grey and Green climate resilient infrastructure
General	<p>The following are not given any importance, and could at least be mentioned given their importance;</p> <ul style="list-style-type: none"> <li>solid-waste management</li> <li>increased sedimentation due to less glacial and snow cover</li> <li>salinisation of groundwater supplies</li> <li>mangroves</li> <li>storage and reservoirs</li> <li>asset management</li> </ul>	ADB	Thank you for your comments, some of these elements are mentioned including MAR and infrastrucutre and water asset.

General	The following are not given much importance, and could be strengthened; sea-level rise, coastal flooding, wave overtopping and storm surges urban farming hydropower decentralised wastewater management deforestation and reforestation maintenance	ADB	The GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, climate-resilient pathways. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, which in turn ensures water security for all, both humans and nature. Please view Section 6 GCG Investment Criteria. Also, please note, some of these elements such as decentralise for wastewater mangment is under pathway 1 and 2. In addition, reforestration under eco-ysytem based management under pathay 2.
General	This submission represents the consolidated input from a number of individuals and organizations from the GCF Network of Civil Society Organization, Indigenous Peoples and local communities, which was coordinated by the CSO Active Observer Team following a small working group process with outcomes shared with the broader listserv for comments, edits/additions and sign-on .	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	The sectoral guide uses the UN definition of water security, which ensures water security for both humans and nature. Please view Section 6 GCG Investment Criteria
General	Water is a public good and this must be a central consideration in ensuring water security in the face of climate change. See for a relevant context: <b>Special Thematic Report 1: Outlining the impacts of climate change on water and sanitation around the world</b> . Special Rapporteur on the human rights to safe drinking water and sanitation, Pedro Arrojo Agudo January 2022; available at: <a href="https://www.ohchr.org/Documents/Issues/Water/Climate/climate-change-1-friendlyversion.pdf">https://www.ohchr.org/Documents/Issues/Water/Climate/climate-change-1-friendlyversion.pdf</a>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comments. The term climate-smart agriculture is well-understood in the water sector. More crop per drop, appropriate crops based on local climates, utilisation of best management practices, such as conservation tillage, to maintain soil moisture content, etc. are well understood techniques of climate-smart agriculture.
General	<b>The right to water and the right to sanitation are fundamental human rights that should be reflected in all their comprehensive objectives and with agreed definitions throughout the guide and provide the normative framing for any recommendations proposed throughout the sector guide.</b> According to UN Water, "The right to water entitles everyone to have access to sufficient, safe, acceptable, physically accessible and affordable water for personal and domestic use.", while "The right to sanitation entitles everyone to have physical and affordable access to sanitation, in all spheres of life, that is safe, hygienic, secure, and socially and culturally acceptable and that provides privacy and ensures dignity." (see for reference: <a href="https://www.unwater.org/water-facts/human-rights/">https://www.unwater.org/water-facts/human-rights/</a> ). Consequentially, <b>throughout the guide, the reference should be to "rightholders" instead of referencing "customers"</b> .	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	The sectoral guide guides investments towards the two paradigm-shifting pathways. Concept notes and proposals are welcome on water projects that mitigate emissions and/or adapt to climate change, while providing numerous co-benefits, including gender equality and ensuring indigenous rights. Section 6 provides the GCF Investment criteria for impactful proposals. Please view Section 6 GCG Investment Criteria
General	While the guide conceptually is framed in terms of "water security" and mentions "water as a human right" in the introduction (line 32), the fact that the water security definition is people- and human rights-centered is otherwise largely ignored in the draft guide (which focuses instead mostly on infrastructure and related finance approaches). So, not the service provision to people in fulfillment of their human right to water and sanitation, but the service provision of the GCF for the financial sector is the focus of this guide. This is misguided.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. Please view Section 6 GCG Investment Criteria
General	Throughout the draft guide, the adjective "climate smart" is used indiscriminately and without definiton, whether related to water or agriculture. This is inappropriate. Given some of the specific conceptual approaches that can hide behind the "climate smart" label, such as soil carbon for agriculture, the GCF Board has already clarified that the term "climate-smart agriculture" should not be used. Instead, climate-resilient agriculture or agroecology should be used instead, especially now that it promoted through the UN wide platform. Similarly, the reference here is ill-advised and must be avoided.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Nature-based solutions (NbS) is an internationally recognised umbrella term utilised for various activities, including ecosystem-based adaptation, ecosystem-based mitigation. Concept notes are welcome on water projects that utilise NbS, including ecosytem-based management (EbM) techniques that promote climate mitigation and adaptation. The sectoral guide refers to EbM and also welcomes other NbS, including nature-based offset programmes that mitigate/adapt to climate change including intergated grey-green infrastucutre. Section 6 provides the GCF Investment criteria for impactful proposals
General	The draft guide does not refer to, and seemingly also does not take into consideration, the GCF's Environmental and Social Safeguards (ESS), its Gender Policy and its Indigenous Peoples Policy. Those core frameworks and policies need to be referenced explicitly and considered.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	The term water security is defined on page 6, Section 6 provides the GCF Investment criteria for impactful proposals where taking care of the ESS including , its Gender Policy and its Indigenous Peoples Policy

General	<p>While the draft sector guide focuses on water security and integrated water resources management (IWRM) primarily in the context of adaptation, this guide should also acknowledge that mitigation projects should consider both potential co-benefits for water security as well as the potential negative impacts mitigation projects could have on water security. This sector guide should identify potential challenges to water security and potential negative impacts or sectors of mitigation projects that could negatively impact water security so as to help accredited entities consider potential areas to avoid or that would have to be mitigated.</p>	<p>GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)</p>	<p>The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. Please view Section 6 GCG Investment Criteria</p>
General	<p>While we are glad to see that there are no textual references to "nature-based solutions" (NbS) in the draft guide, there are two literature sources listed. As the water security sector guide is finalized, it would be important to ensure that the term Nature based solutions (NbS) remains excluded, as they are also used to refer to Nature based offset programs.</p> <p>Secondly, Nbs has an over-emphasis on tree planting rather than a wide range of natural solutions such as protection of wetlands and peat lands, or agroecological farming, all of which are low-cost adaptation strategies that also improve water quality, while simultaneously improving carbon sequestration contributing to mitigation solutions.</p> <p>Last , but not least, NbS do not adopt a rights based approach to development, and thus are not appropriate for GCF sector strategies.</p>	<p>GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)</p>	<p>The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. Please view Section 6 GCG Investment Criteria</p>
General	<p>But what does "water security" mean? The absence of a definition undermines progress in international forums. Marking World Water Day today at UN Headquarters in New York, a common working definition was published, forged by UN and international experts from around the world.</p> <p>The capacity of a population to safeguard sustainable access to adequate quantities of acceptable quality water for sustaining livelihoods, human well-being, and socio-economic development, for ensuring protection against water-borne pollution and water-related disasters, and for preserving ecosystems in a climate of peace and political stability.</p> <p>Amid changing weather and water patterns worldwide and forecasts of more severe transformations to come, calls have been growing for the UN Security Council to include water issues on its agenda.</p> <p>And there's rising international support for adopting "universal water security" as one of the Sustainable Development Goals — a set of mid-term global objectives to succeed the UN's Millennium Development Goals, agreed by world leaders in 2000 for achievement by 2015.</p> <p>"The capacity of a population to safeguard sustainable access to adequate quantities of and acceptable quality water for sustaining livelihoods, human well-being, and socio-economic development, for ensuring protection against water-borne pollution and water-related disasters, and for preserving ecosystems in a climate of peace and political stability."</p> <p>"Security has now come to mean human security and its achievement through development. Water fits within this broader definition of security — embracing political, health, economic, personal, food, energy, environmental and other concerns — and acts as a central link between them."</p> <p>"Common understanding has central importance in international discussions and water security can't continue to have a variety of meanings,"</p> <p>"Access to safe water and sanitation is now a fundamental human right. But water management also requires realistic ways of recovering delivery costs. An agreed definition of water security is vitally important in that context."</p>	<p>ASABE SHEHU YAR'ADUA FOUNDATION</p>	<p>The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. Please view Section 6 GCG Investment Criteria</p> <p>Thank you for your comments</p> <p>The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including gender equality. Section 6 provides the GCF Investment criteria for impactful proposals</p> <p>The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. AE's will utilize this guide to develop their concept notes</p>
General	<p>This sectoral guide provides interesting transformative pathways to help increase the attractiveness of the water sector. The guide seems overall quite robust and based on a solid understanding of the underlying issues of water security.</p>	<p>Global Affairs Canada</p>	<p>The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including strengthening governance. Please view Section 6 GCG Investment Criteria</p>

General	<p>However, the guide might be overlooking some key elements such as access to finance for smaller actors like women's organizations and local communities (including Indigenous people). It is common knowledge in the water sector that women and local communities are powerful agents of change and effective water stewards. With such a strong emphasis on increasing finance for water security, the lack of explicit mention of how these pathways will support access to finance to smaller actors seems like a missed opportunity.</p> <p>Along with nationally coordinated policies, supporting the access to finance to civil society organizations for locally managed infrastructure can help decentralize water management and fill the capacity gap at a national level. Water management in the hands of local communities (especially upstream in rural areas) can be a low-cost and effective way to ensure the socio-economic development and empowerment of communities, while providing adaptation and water security outcomes at the watershed/ecosystem level. The de-risking of small water project should also consider improving the credibility and creditworthiness of local organizations to allow them to properly manage water resources and infrastructure.</p> <p>A stronger emphasis could also be given to the gender component of water security and the massive role that women play in water management in many developing countries. While women generally carry the burden of water collection in in water scarce regions like Africa, they are also affected tenfold by the effects of climate change on the water sector. Yet, many studies show that women are better at managing household finances, including loans and grants for water services. Not recognizing these elements could jeopardize the success of upscaling valuable initiatives and could limit the impact of developing countries in their efforts to adapt to climate change and implement the SDGs. Limiting access to finance to bigger players and referring to smaller actors' involvement in a passive capacity could be detrimental for the goal the GCF wishes to achieve with this sectoral guide.</p>	Global Affairs Canada	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including gender equality. Section 6 provides the GCF Investment criteria for impactful proposals
General	Mention, write upfront the objective of this document, who's the targeted reader? To achieve what	Stockholm International Water Institute (SIWI)	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. The objective of the document is added
General	"mitigating and adapting to climate change through demand management and smart digital water management" will not be sufficient to "preserve and develop alternative water supplies, EbM, circular economy resource recovery, and IWRM". Engaging in a paradigm shift, is something to govern ... hence the importance to also invest in governance. I would explain your Theory of Change there ...	Stockholm International Water Institute (SIWI)	Thanks for the comment, the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. There is a dedicated section (page 23) for water governance under the pathway 2 "IWRM"
General	Ample reference is made to IWRM to in the document, as being a central principle to SDG6. This is indeed correct, but SDG6 also contains a target relating to participatory water management, which is a matter that receives little attention in the main text. This also applies more generally such as principles of inclusive development and (gender) equality, which are integral to the SDGs, but receive very little mention in the main text. E.g. to achieve water security specific attention is required to support women's leadership in water related climate action and to ensure women's adequate vote and agency in water-related decision-making. As with the issue of human rights, we strongly recommend bringing this issue to the foreground in the main text.	Both ENDS	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including water governance benefits. There is a dedicated section (page 23) for water governance under the pathway 2 "IWRM" where participatory approach and community based water management are included. Section 6 provides the GCF Investment criteria for impactful proposals
General	In the draft sector guide there is no mention of the negative effects adaptation and mitigation projects may have on water security. Many local communities, and women in particular due to their socially attributed roles and position, are impacted by water pollution or lack of access to water as a result of large-scale hydropower dams, or large agricultural or geothermal climate projects. Explicit mention and guidance to accredited and implementing entities to identify and avoid such impacts are crucial elements to include in this guide.	Both ENDS	Section 6 provides the GCF Investment criteria for projects, including their contribution to social sustainability
General	To build on the two general comments above, the new sector guide could benefit from the stories told by many campaigns on Women and Water, including the We Women Are Water campaign by the Global Alliance of Green and Gender Action (GAGGA) in 2021, in which the women's role, demands and actions in ensuring water security in the face of climate change are highlighted. On Women's Day in 2022 (March 8), the new campaign kicks off with a focus on gender-just-climate solutions in relation to Water Security and Climate Adaptation. We strongly recommend the new draft takes these stories as many others into account as resources. More information can be found here: <a href="https://gaggaalliance.org/we-women-are-water-campaign-2/">https://gaggaalliance.org/we-women-are-water-campaign-2/</a> and <a href="https://gaggaalliance.org/">https://gaggaalliance.org/</a> (from March 8 the new campaign will be launched).	Both ENDS	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including reducing transboundary conflicts over scarce water resources. Section 6 provides the GCF Investment criteria for impactful proposals

General	For more information on opportunities in the water sector for integrating ecosystem-based approaches to climate change adaptation and disaster risk reduction, see: - <a href="https://www.cbd.int/doc/publications/cbd-ts-93-en.pdf">https://www.cbd.int/doc/publications/cbd-ts-93-en.pdf</a> (p.145)	Convention on Biological Diversity	Thanks for the comment and sharing the link. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Demand management projects are expected to result in permanent water savings. Section 6 provides the GCF Investment criteria for impactful proposals
General	Protection of water sources is a key missing element in the guide. In countries like Colombia, where most of its water sources are located in high altitude mountain, it is crucial to secure funding for protective measures.	Colombia DNP	Thanks for the comment. The second pathway speaking to preservation of the water where water protection is discussed. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including achieving additional SDGs. Please view Section 6 GCG Investment Criteria
General	From a general point of view, the document is lacking attention and recognition of value to the possible transboundary dimension of projects. This could perpetuate the already existing difficulty of financing adaptation projects in transboundary basins through climate finance and should therefore addressed in the revision of the document.	UNECE	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways where the second pathway focus on IWRM including river basin management that imply transboundary water, with water sector projects welcome in all areas that address climate adaptation and mitigation for river basin management. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. Please view Section 6 GCG Investment Criteria
General	Demand -management measures aimed at improving efficiency or re-use should help reduce the vulnerability of water users and build more resilient societies. It is important to bear in mind that increased efficiency in the use of water, initially positive, could increase its use and produce greater dependence on the resource, reducing the ability to cope with episodes of scarcity and increasing vulnerability.	Spain MoE	Thank you for your comment. It is noted. The executive summary follows the GCF template
Executive Summary	Water management is intimately related to a variety of themes/sectors and SDG's, Which the document recognizes in various sections (for instance, line nr. 320 and 619). However, this integrated perspective on water managements and security is lost in the rather arbitrary focus on SDG6 and SDG13 throughout the document. Therefore we recommend placing more emphasis on the integrated nature of water and it's relationship to a variety of SDG's (notably SDG5 re gender equality, SDG14 and SDG15)	Both ENDS	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways where the second pathway focus on IWRM using adaptive management techniques. Adaptive water management techniques are flexible to the changing risks, uncertainty from limitations of data and predictions and challenges whilst striving to meet the needs of all stakeholders from household water supply, industry, irrigation, energy production and flood mitigation despite the high sunk costs in long-lived infrastructure. Under the pathway 2, three areas identified for critical transformation including water governance and anagement structure where gender equity and other other SDGS are represnted. Water sector projects welcome in all areas that address climate adaptation and mitigation . Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. Please view Section 6 GCG Investment Criteria
Executive Summary	The executive summary and conclusion make a welcome reference to water as a human right, but no other reference is made to this issue in the main text. This is an unfortunate omission, particularly considering the tension relationship between water rights and certain other topics that have been afforded much more attention, such as private sector engagement. We therefore <b>strongly</b> recommend addressing the issue of human rights in the main text, as well as it's relationship to other key concepts and principles.	Both ENDS	Thank you for your comment and we agree with your comments. Please note, there are other sections indicated the human rights for water under section 2 and 3/

<p>Executive Summary</p>	<p>As a “cross-sectoral” issues identified, a reference to large hydro dams (under the Energy Access Sector Guide) is included. This is concerning, if this reference is used as an effort to legitimize (as has happened already) GCF expenditure for “climate proofing” large dams (see EBRD project FP040 – <a href="https://www.greenclimate.fund/project/fp040">https://www.greenclimate.fund/project/fp040</a>). There should be a clear exclusion of any financial support for large hydro infrastructure in the name of climate resiliency. Additionally, the main recommendation of the World Commission on Dams Report (<a href="https://archive.internationalrivers.org/sites/default/files/attached-files/world_commission_on_dams_final_report.pdf">https://archive.internationalrivers.org/sites/default/files/attached-files/world_commission_on_dams_final_report.pdf</a>), as summarized by IRN (<a href="https://www.im.org/wcd/">https://www.im.org/wcd/</a>), must be taken into account, when engaging with water dams:</p> <ol style="list-style-type: none"> <li>1. No dam should be built without "demonstrable acceptance" of affected people, and without free, prior and informed consent of affected indigenous and tribal peoples.</li> <li>2. Comprehensive and participatory assessments of people’s water and energy needs, and different options for meeting these needs, should be developed before proceeding with any project.</li> <li>3. Priority should be given to maximising the efficiency of existing water and energy systems before building new projects.</li> <li>4. Mechanisms should be developed to provide reparations, or retroactive compensation, for those who are suffering from existing dams, and to restore damaged ecosystems.</li> </ol>	<p>GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)</p>	<p>Thank you for your comment. It is noted. The executive summary follows the GCF template</p>
<p>Executive Summary</p>	<p>Line 19 refers to climate smart agriculture. Suggest replacing Climate smart agriculture with agroecology, since the suggestion is based on the sectoral guide on agriculture and food security of the Green Climate Fund. Link to sectoral guide: <a href="https://www.greenclimate.fund/sites/default/files/document/agriculture-and-food-security-sectoral-guide.pdf">https://www.greenclimate.fund/sites/default/files/document/agriculture-and-food-security-sectoral-guide.pdf</a></p> <p>The "first draft sectoral guide on agriculture and food security of the Green Climate Fund." clearly states that: “A transformation towards resilient and low-emission agriculture and food systems can be achieved through three paradigm-shifting investment pathways: 1) Promoting resilient agroecology; 2) Facilitating climate informed advisory and risk management services; and 3) Reconfiguring food systems. The three pathways are interlinked and need to be supported by enabling context to ensure their success”.</p> <p>Suggest appropriate edits to reflect this throughout the text.</p>	<p>GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)</p>	<p>Thank you for your comment. It is noted. There is a summary of all guides where all interactive and cross sectors are highlighted.</p>
<p>Executive Summary</p>	<p>We find it very problematic that private sector engagement in the water sector is caveated with “by supporting full cost recovery through direct and indirect charges”. It is not the task of GCF (concessional) finance support to enable full cost recovery of the private sector. The overview table does not include any acknowledgement of or reference to the negative impacts on water service provision and for affected people and communities related to full cost-recovery in terms of accessibility and affordability of water service and its provision as a public good.</p>	<p>GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)</p>	<p>Thank you for your comment. It is noted. We understand the concern, but please note, the GCF is not tasked to support fully cost recover, it is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, climate-resilient pathways. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America. The GCF is endeavouring to mobilising the private sector to invest in water sector through a number of initiatives including treating water as a new asset class that consider credit enhancement and acceptable revenue stream inline with ESG, Paris agreement and SDGs.</p>
<p>Executive Summary</p>	<p>Reference “supporting carbon credit initiatives” under MFS is misguided; focus of “water security” is on adaptation; any carbon credit can at best be a co-benefit, but not a primary focus and intent.</p>	<p>GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)</p>	<p>Thank you for your comment. It is noted. The executive summary follows the GCF template, while the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including empowering local communities in water resources management.</p>

Executive Summary	We find it very problematic to make household level resilient water systems the responsibility of individual households (including in taking up loans) not part of public sector service provision.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. It is noted. Ensuring water is a human right is a key aspect of water security. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including empowering local communities in water resources management
Executive Summary	Under possible actions for the two pathways for water security, under "Mobilising finance at scale" (MFS) for each of the two possible pathways two actions are proposed that we have serious concerns about. We therefore oppose the inclusion of proposed actions.... 1) Under "Enhancing water conservation, water efficiency, and water re-use" one of the recommendations under MFS is to "Enable private sector participation by supporting full cost recovery through direct and indirect charges" 2) Under "Strengthening integrated water resources management and water management" one of the recommendations under MFS is to "Expand micro-finance to support household level resilient water systems" The two recommended actions have serious implications for the poor and vulnerable communities, in particular Indigenous Peoples and women headed households. This gives the impression that apart from paying water bills, households will have to pay out-of-pocket extra charges (i.e., direct/indirect charges so that private sector could recoup its investment, and having to get a loan in the form of micro-finance). If households could not afford to pay, would they forfeit their ability to access clean water, which is a public good with the rights to water and sanitation fundamental human rights? Therefore, the GCF should prioritise funding water security projects/programs where the climate benefits and the socio-economic benefits are judged to be more relevant than the financial return of investors.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, the sector guide acknowledge in the many places water is a human right supported by the United Nations - Sustainable Development Goal 6 (UN-SDG6) Clean Water and Sanitation. Ensuring water is a human right is a key aspect of water security. The water sector can achieve a paradigm shift in water security for both humans and the environment by simultaneously mitigating and adapting to climate change through demand management and smart digital water management, preserving and developing alternative water supplies, EbM, circular economy resource recovery, and IWRM. The sector guide also indicated to provide a fuller picture of the interlinked nature of water and climate, and the very human aspects of their changes, consideration should be given to including the nuance of cultural and local success measures, and one of the key barrier for access to finance is Water services are often under-priced, resulting in low cost-recovery for water investments. The water guide argue under pathway 2: i) Working with local associations to promote knowledge sharing on the costs and benefits of various options to manage water resources; and ii) Engaging community groups where knowledge on climate change adaptation technology and financing options can be shared, including costs and co-benefits.. Also, the poor business model and the context specific of water projects. Wwater pricing is often insufficient to cover the maintenance cost and investments in new water management technologies
Executive Summary	While "integrate social and gender-sensitive dimensions of water security interventions" are mentioned for one of the two pathways (and why not also as relevant to the other?), this is not further expanded upon and nor applied and described in the draft guide.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including empowering local communities in water resources management
Executive Summary	We welcome the inclusion of "ecosystem-based management" (EbM) as one of the approaches to achieve paradigm shift in water security as well as integrating EbM for Integrated Water Resource Management. However, there is no mention of "community-based water management" and "locally-led adaptation" in this document. This best practice should be included in Pathway 2 as the document highlights the importance of empowering and building the capacity of local communities, IPs and women in water security. Respective references should be added to Figure ES-1 (page 9, line 32) by including a new bullet point in column: "Transformational planning and programming" for the paradigm-shifting pathway on "Strengthening integrated water resources management and water management" to read: "Improve community-based water management using locally led adaptation in IWRM for water security interventions at the local level. "	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including empowering local communities in water resources management
Executive Summary	See earlier comments re WASH as a third paradigm shift	UK FCDO	Thank you for your comment. It is noted.
Executive Summary	Needs to emphasis that the most climate vulnerable are often the poorest or excluded in society; women as both water managers and water carriers are critical stakeholders in water security. These two facts need to be reflected in following sections.	UK FCDO	Thank you for your comment. It is noted. The executive summary follows the GCF template. Non-revenue water is discussed under demand management in pathway 1
Executive Summary	Water Security guide should reflect gender sensitivity and targeting vulnerability as important cross cutting issues with additional two bullets. Otherwise, the issues identified are dominated by technological issues.	UK FCDO	Thank you for your comment. It is noted. The executive summary follows the GCF template. These points discussed under related sections in the guide and pathways.

Executive Summary	quality and quantity of water resources	Germany BMZ	Thank you for your comment.added
Executive Summary	Non-revenue water in Europe ranges between 6-29%. There is significant scope to reduce volumes and the subsequent environmental impact.  Given the percentage gains which can be made, naming NRW is important. It is not done so in lines 19, nor 61 and 73 where conservation and management are detail. It is further missing from the table on 131.	UK FCDO	Thank you for your comment. It is noted. The executive summary follows the GCF template. Non-revenue water is discussed under demand management in pathway 1
Executive Summary	insert MANGROVES	ADB	Thank you for your comment, included
Executive Summary	Include Forecasting	ADB	Thank you for your comment, included
Executive Summary	Include flood risk management	ADB	Thank you for your comment, included
Executive Summary	Inlcude wastewater	ADB	Thank you for your comment, included
Executive Summary	Integrating re-use of treated wastewater where appropriate.	KfW	Thank you for your comment, included
Executive Summary	Not really clear-cut what should be included in "Cities, buildings and urban systems" and what in "water scarcity".  To be added: Urban water treatment including distribution, water loss reduction and demand management. Urban sanitation including also centralised wastewater management.  Flood management including coastal protection and stormwater management.	KfW	Thank you for your comment, included
Executive Summary	IWRM approaches to coordinate use of scarce water resources within users.	KfW	Thank you for your comment. It is noted. The executive summary follows the GCF template
Executive Summary	Efficient pumping, use of renewable energies e.g. solar sludge drying or biogas use from sludge treatment to cover energy needs of wastewater treatment plants. Efficient sludge presses and aerification could also be added.	KfW	Thank you for your comment, included
Executive Summary	Might be good to specify "Cross-sectoral WATER issues"	Sanitation and Water For All (SWA)	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate. Ensuring water is a human right is a key aspect of water security
Executive Summary	We appreciate including the opening paragraph laying out the impacts of climate change on water security. We recommend including a reference to the recently released IPCC AR6 Working Group 2 report (see Summary for Policymakers here: <a href="https://report.ipcc.ch/ar6wg2/pdf/IPCC_AR6_WGII_SummaryForPolicymakers.pdf">https://report.ipcc.ch/ar6wg2/pdf/IPCC_AR6_WGII_SummaryForPolicymakers.pdf</a> ) as it notes the impacts on water security already and how they will be exacerbated in the future.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. It is noted and considered
Executive Summary	Maybe consider adding here that climate change is adding additional pressure to already existing challenges affecting water security e.g. urbanization, population growth and diversifying diets.	GIZ	Thank you for your comment. It is noted and considered
Executive Summary	Maybe consider adding here that climate change is adding additional pressure to already existing challenges affecting water security e.g. urbanization, population growth and diversifying diets.	KfW	Thank you for your comment. It is noted and considered
Executive Summary	Unpredictable and irregular changes to precipitation patterns are also important factors in future climate scenarios and are expected to endanger water security and introduce increasing uncertainty in water resource management.	Convention on Biological Diversity	Thank you for your comment. It is noted.
Executive Summary	Overdesign gives a false sense of security when recent weather events are now regularly exceeding the extremes of climate scenarios – building bigger and stronger is NOT enough. The UK thinks we have to RE-design infrastructure too, using NbS, that works with nature. We believe NbS provides greater resilience to the uncertainties of climate change because it leaves a broader range of options to cope with that uncertainty.	UK FCDO	Thank you for your comment. It is noted and changed.
Executive Summary	It is inappropriate to make a blanket suggestion that planners over-design infrastructure because of climate change. This is not the most prudent way of dealing with uncertainty. Rather, it may be one of the solutions, but only where we have more certainty around future flood and drought risks. And where there is high uncertainty, it should be one of many options considered to hedge against this uncertainty.	World Bank	Thank you for your comment. It is noted and changed.

Executive Summary	It may be worth elaborating on what "water scarcity" means or entails. For example, in the IPCC AR6 Working Group 2 Summary for Policymakers (Fig. SPM-2), it states that "'Water scarcity' considers, e.g., water availability in general, groundwater, water quality, demand for water, drought in cities." This can help the GCF ground its sectoral guide in the science associated with climate impacts.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. It is noted and reference used
Executive Summary	We appreciate that in the opening lines of this Sector Guide, the GCF recognizes that "water is a human right." It is critical that this framing carries throughout the sector guide.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. It is noted and changed.
Executive Summary	Would be good to add here the latest estimates by the UNICEF-WHO Joint Monitoring Programme indicating that 2 billion people lack access to safely managed drinking water and 3.6 billion lack access to safely managed sanitation. This is very important as people without appropriate services are most vulnerable to the effects of climate change. Info available at <a href="https://washdata.org/">https://washdata.org/</a>	UNICEF	Thank you for your comment. It is noted and changed.
Executive Summary	Would be good to add here that latest estimates indicating that xx billion people lack access to safely managed drinking water and YYY billion lack access to safely managed sanitation. <a href="https://washdata.org/">https://washdata.org/</a>	Sanitation and Water For All (SWA)	Thank you for your comment. It is noted and changed.
Executive Summary	Need to follow the 1st sentence with clear statements about the importance of addressing inequalities in water allocation and control, in the context of climate vulnerability and gender.	UK FCDO	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	Would be best if the thematic scope is across SDG6 targets, and importantly needs to cover water as a resource (that can be, demand management, IWRM, and water management as per current two proposed pathways) but also we need to see water as a service (targets 6.1 and 6.2 on drinking water and sanitation) so the important adaptation needs of water supply and sanitation infrastructure and services have a place in these guidelines. This is key for community resilience, because communities greatly depend on those services for their basic needs, (drinking water, sanitation and hygiene) as well as small scale livelihoods. Climate change may compromise all at once.	UNICEF	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	Given the UN 2013 Water Security quote provided in the guide, the GCF Water pathways could benefit indeed from referencing the four UN-Water dimensions of water security : <a href="https://www.unwater.org/publications/water-security-infographic/">//www.unwater.org/publications/water-security-infographic/</a>	UNICEF	Thank you for your comment. It is noted. This is in line with water security guide.
Executive Summary	Given the UN 2013 Water Security quote provided in the guide, the GCF Water pathways could benefit indeed from referencing the four UN-Water dimensions of water security as in the infographic: <a href="https://www.unwater.org/publications/water-security-infographic/">https://www.unwater.org/publications/water-security-infographic/</a> 	Sanitation and Water For All (SWA)	Thank you for your comment. It is noted. This is in line with water security guide.
Executive Summary	Would be best if the thematic scope is across SDG6 targets, and importantly needs to cover water as a resource (that can be, demand management, IWRM, and water management as per current two proposed pathways) but also we need to see water as a service (targets 6.1 and 6.2 on drinking water and sanitation) so the important adaptation needs of water supply and sanitation infrastructure and services have a place in these guidelines.	Sanitation and Water For All (SWA)	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.

Executive Summary	We appreciate the framing on the importance of integrated water resources management (IWRM) and that “water security emphasises adaptation projects” as ensuring water security can and should be seen as an important part of adaptation and as a focus of adaptation projects generally. However, this guide should also acknowledge that mitigation projects should consider both potential co-benefits for water security as well as the potential negative impacts mitigation projects could have on water security. This sector guide should identify potential challenges to water security and potential negative impacts or sectors of mitigation projects that could negatively impact water security so as to help accredited entities consider potential areas to avoid or that would have to be mitigated.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and/or mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	Does this statement refer to current adaptation for water security projects? If not, then the three points do not necessarily imply the need for integrating resilience of source water resources.	UNDP	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate. Please also note, the first pathway is dedicated for mitigation.
Executive Summary	Water security also has mitigation implications that are generally dealt with as an afterthought in this Sectoral Guide. E.g., NRW reduction and EE improvements, emissions associated with reservoir construction, integrating renewables into water infrastructure, nature-based solutions, methane and nitrous oxide reductions, etc. Adaptation and mitigation considerations should be integrated in terms of water security enhancing activities from the get-go.	World Bank	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and/or mitigation, including WASH and ecosystem based management. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	Water quality related fatalities – what about morbidity associated with repeated episodes of diarrhoea, or chronic exposure to excess chemical contaminations? i.e., it is not just about mortality. WHO can provide evidence.	UK FCDO	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	The table ES1 explains that the sectoral guide on “ <b>Cities, buildings, and urban systems</b> ” <b>already covers “urban water supply resiliency”</b> , therefore we would expect from the WASH sector to have in this water security guidelines a good representation of both urban <b>and rural</b> water & sanitation resiliency. Framing things under “utilities” leaves most of rural areas currently lacking access to water supply and sanitation out of the scope of this guidance, as they normally rely on small scale private operators.	UNICEF	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	The table ES1 explains that the sectoral guide on “ <b>Cities, buildings, and urban systems</b> ” <b>already covers “urban water supply resiliency”</b> , therefore we would expect from the WASH sector to have in this water security guidelines a good representation of both urban <b>and rural</b> water & sanitation resiliency. Framing things under “utilities” leaves most of rural areas currently lacking access to water supply and sanitation out of the scope of this guidance.	Sanitation and Water For All (SWA)	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and/or mitigation including urban and rural areas under the geographical focus of GCF (LDC, SDIS, Africa, Asia, latin america). Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.

Executive Summary	A "new paradigm" is referenced here and throughout the document. However, what is actually new about this paradigm? Many of the approaches referenced and described throughout the document have been around for decades. It fails to make a convincing case for a paradigm shift needing to happen in the first place, let alone what needs to be done concretely to get there. The full integration of mitigation and adaptation may be more akin to a new paradigm, but this is not the direction that the Sectoral Guide ultimately takes.	World Bank	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and/or mitigation including urban and rural areas under the geographical focus of GCF (LDC, SDIS, Africa, Asia, Latin America). Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	There is an opportunity here to include mechanisms to incentivize integration of nature based approaches within "energy positive water utilities"	UNDP	Thank you for your comment. It is noted. The executive summary follows the GCF template, this is discussed under the relevant section for EBM
Executive Summary	Why not industry as well – globally it is 20% of water withdrawals	UK FCDO	Thank you for your comment. It is noted. The executive summary follows the GCF template
Executive Summary	The first page of the ES indicates this will be mainly about IWRM, but here it begins to reference WSS and utilities. In principle, it's a very good decision to include WSS in the broader IWRM discussion around water security. However, the audience and main counterpart for the investments and support for fostering water security (as envisioned in this Sectoral Guide) needs to be clearer from the beginning. Is it the water utility that is the primary target? Or the national water agency? Or both? Whatever the answer, who will be benefiting from the support should be front and center in the way this Guide is framed and nuanced.	World Bank	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	Desalination should be explicitly named here.	KfW	Thank you for your comment. It is noted. The executive summary follows the GCF template
Executive Summary	This should also consider increased water capture and management through NBS, these are innovative in themselves particularly if you link with ecosystem based payments (RBP scheme) and as part of an integrated strategy. <a href="https://wedocs.unep.org/handle/20.500.11822/32058">https://wedocs.unep.org/handle/20.500.11822/32058</a> and <a href="https://programme.worldwaterweek.org/Content/ProposalResources/PDF/2020/pdf-2020-9418-1-Nature%20Based%20Solutions%20and%20Water%20Security.pdf">https://programme.worldwaterweek.org/Content/ProposalResources/PDF/2020/pdf-2020-9418-1-Nature%20Based%20Solutions%20and%20Water%20Security.pdf</a> (p10)	UNDP	Water insecurity is lack of water security.
Executive Summary	The two proposed pathways do not represent well at the moment the adaptation needs of the WASH sector. Demand management for populations that still don't have RESILIENT ACCESS to water supply is still a long way to go. In the meantime, these populations need new infrastructure and new water AND SANITATION services that need to be planned carefully to withstand the impacts of climate change (risk assessments are needed for WASH services, capacities of governments need to be strengthened, climate resilient standards need to be developed, ... ..). UNICEF together with GWP, have developed a framework for the WASH sector, that it's being implemented over 70 countries, and it's used also when developing WASH related proposals to GCF. Such WASH sector tools could be referenced in these guidelines. <a href="https://www.gwp.org/en/WashClimateResilience/">https://www.gwp.org/en/WashClimateResilience/</a>	UNICEF	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	The two proposed pathways do not represent well at the moment the adaptation needs of the WASH sector. Demand management for populations that still don't have RESILIENT ACCESS to water supply is still a long way to go. In the meantime, these populations need new infrastructure and new water AND SANITATION services that need to be planned carefully to withstand the impacts of climate change (risk assessments are needed for WASH services, capacities of governments need to be raised, climate resilient standards need to be developed, ... ..). The WASH sector has proposed frameworks that countries are already working on with, including when developing WASH related proposals to GCF. Such WASH tools could be referenced in these guidelines.	Sanitation and Water For All (SWA)	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	The two proposed pathways significantly overlap with one another. The strategy would benefit from further clarifying which activity belongs under the respective pathway.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment. It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways (Pathway 1 for mitigation and pathway 2 mainly for adaptation), Please note allowing overlapping ecourge cross cutting projects that address mitigation and adaptation with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.

Executive Summary	'Paradigm shift pathway' is one example of jargon that will make it difficult for some water sector professionals to understand the guideline. See also line 356 'Drivers of change across paradigm shifting pathways'. There are many examples that will limit the accessibility of these guidelines. To quote a UK FCDO water adviser in a developing country: 'For me, the guideline is a bit difficult to digest as it has lots of jargons'.	UK FCDO	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including water quality benefits. GCF Section 6 provides an overview of the investment criteria. GCF, is also planning to release water sector project design, that inform and guide AE on how to develop a water sector project.,
Executive Summary	In "Paradigm shifting pathways" the notion of "pathways" appears undefined, and somewhat confusing/ not appropriate throughout the document – see line references.  <b>In the context of the Paris agreement, "pathways" primarily refers to development pathways of countries (as mentioned line 173), with their implicit temporal and overall socio-economic patterns dimensions, respectively.</b>  Water conservation, water efficiency and water re-use on the one hand, strengthening integrated water resources management on the other hand, are more of a set of -highly recommendable- practices/policies/avenues for actions contributing to resilient and low-carbon development pathways and resilient (and low carbon and resilient water sectors within them), than "pathways" on their own.  The sectoral guidelines could hence usefully make a clear reference to an overall objective of making sure water interventions contribute to / are consistent with low- carbon and resilient development pathways in countries, through adequate water practices and policies, and probably avoid using the notion of "pathways" to describe the latter.  It could also mention up-front the country-specificity of constraints and opportunities for the deployment of such practices/policies	UK FCDO	Thank you for your comment. The GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, climate-resilient pathways. Concept notes and proposal with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes/proposal will be assessed on their mitigation/adaptation potential and the multiple benefits they generate. Please view Section 6 GCF Investment Criteria. The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America. Please also note, the two pathways, pathway 1 dedicated to mitigation and pathway 2 dedicated to adaptation.
Executive Summary	Suggestion: include a point on how to balance different water uses (water for agriculture, for domestic and industrial uses integrating also water for ecosystems), which is needed to maintain the hydrological cycle. Addressing competing uses and trade offs will help to enhance resilience	GIZ	Thank you for your comment, this is part of IWRM pathway 2.
Executive Summary	new conditions are indeed increased climate change impact, but also a reduced access to carbonated energy / or energy in general, impacting access to water.	Stockholm International Water Institute (SIWI)	Thank you for your comment
Executive Summary	Compel implies regulatory/enforcement when there are market measures – better to say "encourage". Removing barriers to what? As in line 27 above it is now considered impossible to "climate proof" infrastructure – ask the actuaries in the insurance industry.	UK FCDO	Thank you for your comment. It is noted and considered (page 7)
Executive Summary	Avoid the term "climate proofing" here and throughout the document - this is a misnomer and not really possible.	World Bank	Thank you for your comment. It is noted.
Executive Summary	"Climate proofing of water infrastructure" is listed as a focus of paradigm-shifting pathways; this needs some clear criteria, including no-go areas, so as to avoid the mal-allocation for maladaptive purposes of scarce GCF resources continued support for and expanding the lifespan of large dams, given their disastrous environmental and social impacts, and damaging CO2 emissions contributions. (see for example <a href="https://aida-americas.org/en/dam-no-more-truth-about-large-dams#:~:text=1.,matter%20retained%20in%20flooded%20reservoirs.">https://aida-americas.org/en/dam-no-more-truth-about-large-dams#:~:text=1.,matter%20retained%20in%20flooded%20reservoirs.</a> )	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, (pathway 1 for mitigation and pathway 2 for adaptation) including initiatives that promote to treat water as a new asset class and integrate grey-green resilient infrastructure to improve resilience and reduce CO2 emissions.
Executive Summary	Rather, conservation and sustainable use/management	UNDP	Thank you for your comment. It is noted. The executive summary follows the GCF template
Executive Summary	"... promoting the preservation of water at each step of the water cycle, by taking an ecosystem-based/landscape approach, ensuring the conservation, restoration and sustainable use of water resources and freshwater ecosystems, maximising innovation and supporting circular economy principles."  The above should be added to ensure a holistic approach that will be more synergistic with other GCF Guides.	Convention on Biological Diversity	Thank you for your comment. It is noted. The executive summary follows the GCF template. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including positive benefits in transboundary environments. Please view Section 6 GCF Investment Criteria
Executive Summary	Strongly suggest that maximizing innovation lists/includes adoption of nature based solutions as part of the innovative design of water security projects.	UNDP	Thank you for your comment.
Executive Summary	Do you mean water "insecurity" here instead of "water security"?	World Bank	Water insecurity is lack of water security.

Executive Summary	In line with the previous comment: demand-management measures must be aimed at <b>saving, reducing net consumption and protecting the resource, and avoiding increasing consumption and introducing more stress into the water system.</b> Moreover, it is also important to consider the negative impacts of the proposed measures. For example, the implications of the use of renewable energies for the extraction of groundwater in the increase in consumption and its possible overexploitation, or water quality problems that could occur arise with the use of techniques such as the artificial recharge of aquifers.	Spain MoE	Thank you for your comment. It is noted.
Executive Summary	<b>"Enhancing water conservation, water efficiency and water re-use", in fact this is Water Demand Management and is part of IWRM.</b>	Stockholm International Water Institute (SIWI)	Thank you for your comment. It is noted.
Executive Summary	In as much as the statement "supply side under threat or not financially sustainable" could be a general global trend, it might not necessarily apply for some, if not, most of Sub-Saharan Africa (SSA) countries who still are facing severe constraints in developing their water supply infrastructures (mainly irrigation). The strategy might wish to propose how these countries can be better supported.	Food and Agricultural Organization of the United Nations (FAO)	The GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, climate-resilient pathways. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. Please view Section 6 GCF Investment Criteria. The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America. Please also note, the two pathways, pathway 1 dedicated to mitigation and pathway 2 dedicated to adaptation.
Executive Summary	Need to add that water conservation is linked to the conservation and restoration of different types of ecosystems (such as wetlands, mountain and forest ecosystems) - this link should be made in the guide.	GIZ	Thank you for your comment. It is noted.
Executive Summary	Aspects related to water quality might be included as part of the overall conservation concept. It could be mentioned more explicitly here unless it would be considered under 73 -77 as part of IWRM.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment. It is noted and included in the relevant sections.
Executive Summary	Water efficiency both at production and also at consumption side.	KfW	Thank you for your comment. It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, water efficiency included in the relevant sections in the guide.
Executive Summary	This is a very dated reference and the GHG emissions associated with water use are very country and sub-sector specific. Suggest using IEA numbers on energy consumption to make the point implicitly and/or seeing if there are more up-to-date analysis that make more direct estimates between water use and GHG emissions.	World Bank	Thank you for your comment. It is noted.
Executive Summary	This sounds a lot but is only 7g per litre of water from these figures. Mike Berners-Lee ("How Bad are Bananas", 2021) calculates a pint of tap water at 0.2kg of CO2 – a lot less - which is 18kg of CO2 per British person per year. However energy use for water extraction, pumping, storage, treatment etc is likely to increase with climate change as supplies dwindle, become more remote and require more purification.	UK FCDO	Thank you for your comment. It is noted, and this is also needed to be included in the real value of water along the water cycle and across other sectors.
Executive Summary	Proposed: Promoting both increase levels of access to sanitation and alternative water resources	UNICEF	Thank you for your comment. It is noted.
Executive Summary	Proposed: Promoting both increase levels of access to sanitation and alternative water resources	Sanitation and Water For All (SWA)	Thank you for your comment. It is noted.
Executive Summary	Suggest citing and drawing from the recent WB work on WICER: <a href="https://openknowledge.worldbank.org/bitstream/handle/10986/36254/163924.pdf">https://openknowledge.worldbank.org/bitstream/handle/10986/36254/163924.pdf</a>	World Bank	Thank you for your comment
Executive Summary	Proposed: Strengthening integrated water resource management and RESILIENT WATER SUPPLY AND SANITATION SERVICES	Sanitation and Water For All (SWA)	Thank you for your comment. It is noted.
Executive Summary	Proposed: Strengthening integrated water resource management and RESILIENT WATER SUPPLY AND SANITATION SERVICES	UNICEF	Thank you for your comment
Executive Summary	Good to see more reference to NbS here, plus Managed Aquifer Recharge to replenish groundwater.	UK FCDO	Thank you for your comment and a new section for MAR has been added
Executive Summary	We welcome the preservation of existing water resources as sub area to generate adaptation projects but we encourage to explicitly mention that this area includes also <b>transboundary waters</b> . Indeed, there are 263 transboundary lake and river basins cover almost half the Earth's surface. 145 States have territory in these basins, and 30 countries lie entirely within them.	UNEP	Thank you for your comment, we acknowledge the transboundary water. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including reducing transboundary conflicts over scarce water resources. Section 6 provides the GCF Investment criteria for impactful proposals

Executive Summary	Proposed: Development of new water supply sources and management of related water and sanitation services	UNICEF	Thank you for your comment
Executive Summary	1. Suggest substituting with "conservation and restoration" instead of preservation as water resources are used for human benefit and may need to be restored to increase water supply and/or stabilize flow.	UNDP	Thank you for your comment
Executive Summary	2. How do you consider balance between the first and 2nd bullet?	UNDP	Thank you for your comment
Executive Summary	Proposed: Development of new water supply sources and management of related water and sanitation services	Sanitation and Water For All (SWA)	Thank you for your comment
Executive Summary	Should also include disaster risk reduction For more on disaster risk reduction and opportunities in the water sector, please see: <a href="https://www.cbd.int/doc/publications/cbd-ts-93-en.pdf">https://www.cbd.int/doc/publications/cbd-ts-93-en.pdf</a> (p.145)	Convention on Biological Diversity	Thank you for your comment
Executive Summary	As not all water related hazards have a climate rationale (i.e. tsunamis) it would be best to refer here to CLIMATE related hazards (which is also mentioned in the UN-Water dimensions of Water Security)	UNICEF	Thank you for your comment
Executive Summary	As not all water related hazards have a climate rationale (i.e. tsunamis) it would be best to refer here to CLIMATE related hazards (which is also mentioned in the UN-Water dimensions of Water Security)	Sanitation and Water For All (SWA)	Thank you for your comment
Executive Summary	WASH is a critical omission, noting that 'water for human well-being' is specifically mentioned in UN Water's 2013 definition of water security, cited in the guideline. According to GCF data, WASH accounts for 50% of the GCF water portfolio. But we know 2 billion people still lack access to safely managed water supplies, around double this number lack access to safely managed sanitation. These people are water insecure according to UN Water's definition and many of them are highly vulnerable to climate change. I would propose the guideline includes a WASH pathway because of this – focusing on how to ensure that water supplies and sanitation systems (that are dependent on water for safe operation) are indeed climate resilient – in both urban and rural contexts.	UK FCDO	Thank you for your comment, It is noted. The executive summary follows the GCF template. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
Executive Summary	The most important barrier is missing ... the governance ...the biggest barrier are the institutions failing to deliver, it is the lack of accountability, transparency and participation of stakeholders.	Stockholm International Water Institute (SIWI)	Thank you for your comment, considered addition
Executive Summary	Further detailed analysis on barriers is needed	UNDP	Thank you for your comment
Executive Summary	This document should also acknowledge that barriers to water security can also be mitigation strategies that have significant impacts on water. These potential mitigation approaches should be named and it should be emphasized that in assessing mitigation projects, AEs and other project developers should consider and implement ways to mitigate negative impacts on water security, including the possibility that a mitigation strategy might be inappropriate depending on the circumstance.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment that discussed under the barrier dedicated section
Executive Summary	The section on "barriers" to water security (p.7-8 of the guide) resonate well with the situations of FCV where infrastructure might be outdated, institutions and environmental protection weaker, division among different groups sharp, water governance poor and data scarce. Finding ways to strengthen water security in such settings despite these obstacles is particularly important, given the heightened vulnerability of communities (which often includes the difficulty in accessing them).	International Committee of the Red Cross (ICRC)	Thank you for your comment that discussed under the barrier dedicated section
Executive Summary	The descriptions on barriers and enablers (79 - 113) , GCF investment criteria (115 - 127) , and ToC (364) are very useful for technical experts preparing GCF proposals.	Food and Agricultural Organization of the united Nations (FAO)	Thank you for your comment. It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including reducing transboundary tensions
Executive Summary	It would be useful to explain that barriers and enablers listed here are those commonly found in developing economies, but that situations will also typically be country-specific ( less or additional barriers/enablers according to local characteristics -with, inter alia, vulnerability, water scarcity levels often playing a role)	UK FCDO	Thank you for your comment
Executive Summary	More important than 'environmental technologies' would be to take an ecosystem-based/landscape approach to water management and to ensure that environmental safeguards are in place to protect the entirety of water systems. For example, safeguards implemented in the agricultural sector can decrease harmful nutrient runoff that enters freshwater systems and impacts water security. The 'environmental key barrier and enabler' should not only be focused on building new 'environmental technologies', it should also focus on the health of the entire water cycle and to ensure its sustainable functioning.	Convention on Biological Diversity	Thank you for your comment. It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including reducing transboundary tensions

Executive Summary	Environmental limits should be described in more details, and more explicitly, considering both hydrological functions / ecosystem needs and water resources for human benefits. Also suggest adding "...limits are not reached or surpassed" as many water resources are already being used beyond recharge capacity.	UNDP	Thank you for your comment, Changes not necessary in the executive summary because these issues are developed in the main body of the document.,
Executive Summary	What are environmental technologies in this context? Also, we suggest this includes know-how that is lacking in water management agencies on climate impacts, a lack of cross-sectoral know-how, there is a lack of knowledge on aquifer capacity, and monitoring in the majority of countries. Short term decision making and political drivers leading to short term decision making is also a factor.	UNDP	Thank you for your comment, Changes not necessary in the executive summary because these issues are developed in the main body of the document.,
Executive Summary	"Insufficient water pricing" is mentioned as a barrier to paradigm-shifting pathways, but without mentioning and cross-referencing the issue of affordability of water service provision and access to water as a human right. This is a problem throughout the guide, where "willingness" to pay is referenced, but not the "ability" to pay (= purely economic cost-recovery argumentation).	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, Changes not necessary in the executive summary because these issues are developed in the main body of the document.,
Executive Summary	In addition to the points addressed, the cost/risk of inaction should be added, such that the cost of a disaster will grow over time if unaddressed. I.e., eutrophication of freshwater ecosystems and collapse of water resources systems.	Convention on Biological Diversity	Thank you for your comment. It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate
Executive Summary	Add to this the legal restraint in most countries that consider water access a basic human right. This is in turn translated in water pricing structures that undervalue the true cost. It is often very difficult to increase these tariffs enough to allow investment. For example in one country the legal mandate states that if profits made in water costing are too large than costs need to be reduced to just cover basic OM. Hence legal challenges result in these economic and financial challenges.	UNDP	Thank you for your comment, Changes not necessary in the executive summary because these issues are developed in the main body of the document.,
Executive Summary	Inefficient management of resources at the utility level could be added here.	KfW	Thank you for your comment, Text added .
Executive Summary	Relating to an earlier suggestion to include a definition of the water sector. Doing so would clarify what is meant here	Germany BMZ	Thank you for your comment, the boundary of water sector is varied by context and scale.
Executive Summary	Could be expanded to refer to the "water and sanitation" sectors	UNICEF	Thank you for your comment, Text added .
Executive Summary	Could be expanded to refer to the "water and sanitation" sectors	Sanitation and Water For All (SWA)	Thank you for your comment, Text added .
Executive Summary	The practices of indigenous peoples can also effectively conserve and sustainably manage water resources. These practices need to be recognized and acknowledged.	Convention on Biological Diversity	Thank you for your comment, this is included in related section including section 6.
Executive Summary	It is recommended that gender be mentioned in the barriers and enablers section.	Global Affairs Canada	Thank you for your comment, Text added .
Executive Summary	1. Suggest explicit mention of what these novel sustainable technologies are. 2. The lack of systematic integration of Nature based solutions and the regulatory framework required to support and incentivise these is missing. 3. Novel approaches include NbS either as a primary adaptation approach or in combination with grey infrastructure. For the water sector, it is fundamental for long term adaptation to consider and integrated ecosystem based approaches that allow for restoration of water resources as well as conservation. Only through this sustainability lens can we expect resilient water security.	UNDP	Thank you for your comment, agree, but no need to change the executive section, since technologies discussed in relevant section in the body of the document
Executive Summary	Talking about institutional and regulatory barriers it would be important mentioning that the lack of adequate <b>transboundary cooperation in shared water basins</b> can negatively affect water allocation among countries and sectors, regional stability and resilience of populations.	UNECE	Thank you for your comment, agree, this is mentioned in three locations in the document under ToC, enablers and transformational planning and programming
Executive Summary	The bullet (over) focuses on the impact on technology. This is one issue, but institutional and regulatory weaknesses have a much broader impact on the establishment and continued provision of climate resilient water and sanitation services.	UK FCDO	Thank you for your comment, text reworded including poor governance
Executive Summary	Suggestion: broaden the scope & include issues of property rights that are important for water governance as well as regulations regarding the water finance architecture.	GIZ	The reference has been added, water governance issue has its own section in the body of the document.
Executive Summary	Under "Institutional and regulatory", FAO would like to suggest rearticulating the information on reluctance, as many institutions in SSA face severe constraints (rather than reluctance) in developing the appropriate Quality Management (QM) system to support traditional hard engineering infrastructures as well as novel sustainable technologies.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, institutional discussed to great depth in many locations in the document. No need to change the executive summary.

Executive Summary	What is meant by these new technologies?	UNDP	Thank you for your comment, technology discussed in the document in many locations that goes for innovation, IoT, smart technologies, etc
Executive Summary	B) Financing-focused comments: On p.8, in "[t]he role of GCF in financing paradigm shifting pathways", the actions might not be equally relevant and applicable in all developing countries (specifically the mobilizing finance at scale driver of the GCF Strategic Plan, and all the possible subsequent actions for this pathway captured in the table on p.4). The over-emphasis on catalyzing private finance throughout the guide's financing considerations is less likely to produce results in the most vulnerable FCV countries where there are strong disincentives for investment.	International Committee of the Red Cross (ICRC)	Thank you for your comment, The GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, climate-resilient pathways. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America.
Executive Summary	Monitoring and data collection are necessary for all developing countries, as it is key to measuring and managing resources. FAO suggests combining technologies in water monitoring, together with innovation, to ensure effective financing.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, text adjusted
Executive Summary	The possible actions laid out for the mobilizing finance at scale pathway presupposes strong, committed and functional public institutions and stresses mobilization or leveraging of private sector investments as the means to increase the flow of the same. The weight on financial instruments like blended finance, de-risking tools, creditworthiness through credit enhancements and de-risking, eco-system-based insurance, disaster-risk insurance and bonds, blue-green bonds, etc., de-facto excludes countries suffering from conflict and violence, as actors with presence and trajectory in these settings do not yet have the organizational mandates, systems and resources to leverage private capital effectively.	International Committee of the Red Cross (ICRC)	Thank you for your comment, The GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, climate-resilient pathways through a number of financial instruments that are mobilising public and private sectors. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America.
Executive Summary	When it comes to "GCF investment criteria" (p.8), it has to be considered that FCV countries might be well placed as 'impact' and 'recipient needs' but other criteria – such as 'paradigm shift potential', 'sustainable development potential', 'country ownership' and 'efficiency and effectiveness' – could be challenging. This is an element that shall be taken into consideration, in order not to make access to funds too complex for those countries.	International Committee of the Red Cross (ICRC)	Thank you for your comment, Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide according to the GCF investment criteria (please review section 6). The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America.
Executive Summary	In order for projects to have greater impact, the possibility for <b>transboundary projects</b> to accede GEF funds should be encouraged and the transboundary / regional dimension of the project should be assessed as an added value.	UNECE	Thank you for your comment, The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including reducing transboundary conflicts over scarce water resources. Section 6 provides the GCF Investment criteria for impactful proposals
Executive Summary	This criteria should be of a second order or at least moved lower down. The establishment of a fund is to achieve its objectives, rather than to rank so highly change beyond the initial need and scope.  It is suggested that the order is reviewed as follows 1, 3, 4, 5, 6, and finally 2. This order reflects project impact as sited within the wider SDG objectives, is needs based, recognises that a project will not succeed without political support, nor robust economic backing and finally, wider benefits.	UK FCDO	Thank you for your comment, Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide according to the GCF investment criteria (please review section 6). The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America.
Executive Summary	Why focusing only on national SDG priorities? It would be important to take into consideration also <b>basins / regional</b> ones in case of larger scale projects.	UNECE	Thank you for your comment, The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including different scale of impacts from farm, to district to region to basin and multiple countries. Section 6 provides the GCF Investment criteria for impactful proposals

Executive Summary	We consider that issues regarding water governance are missing. We should not forget the importance of reinforcing water governance, through processes of coordination, consultation and participation in which all the actors involved (administrations, managers, users and the rest of stakeholders) intervene in the decision-making process	Spain MoE	Thank you for your comment, agreed and water governance has its own dedicated section under pathway 2 (section 3.2.2)
Executive Summary	Under the heading 'Mobilising finance at scale': Realize the multiple co-benefits of ecosystem-based mitigation and adaptation to climate change that contribute to water security and health of freshwater ecosystems.	Convention on Biological Diversity	Thank you for your comment, The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including ecosystem based management, water security and health of freshwater ecosystems. Section 6 provides the GCF Investment criteria for impactful proposals
Executive Summary	Build on existing benchmarking systems where available (under "Transformational Planning & Programming")	KfW	Thank you for your comment
Executive Summary	Whether decentralised or centralised systems are advised should be the result of a comprehensive cost-benefit analysis in the specific context (under "Catalysing climate Innovation").  There are very few examples where desalination plants are operated successfully using renewable energies. Both very valid approaches should be combined through increasing the renewable energy portion in the energy mix of the country (under "Catalysing climate Innovation")	KfW	Thank you for your comment. Agreed, Section 2 discusses GHG emissions in general from the water sector. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including desalination projects. Section 6 provides the GCF Investment criteria for impactful proposals
Executive Summary	The experience so far are important to keep in mind: so far there is only grant finance projects, mostly in adaptation, by public sector AEs. This reality should temper the expectations of mobilising finance at scale a bit.	Germany BMZ	Thank you for your comment. Agreed, Section 2.4 discusses financing adaptation and mitigation including barriers to finance and principle to help overcome these barriers and how GCF can support to mobilising private sector. Section 6 provides the GCF Investment criteria for impactful proposals
Executive Summary	1. We suggest that integration of ecosystem management and nature based solutions across the spectrum of water projects provide a paradigm shifting pathway. This goes beyond simply ecosystem benefit analyses of EbM. Consider also using standard terminology – either EbA or NbS for working with nature to enhance water sector resilience.  2. Reflect potential solutions to pricing barriers.  3. Advise to integrate a mention to the restoration/maintenance of cities' surrounding ecosystems for the improved access to water (this goes beyond "sponge cities", with the need for city planning and policies to take into account areas outside of the city). EbM includes these aspects, but is only mentioned under "mobilising finance at scale" and should also be included under "transformational planning and programming".	UNDP	Thank you for your comment, Ecosystem based management is defined under pathway 2 and has its own dedicated section (section 2.3.4) and proposed activity for mitigation drought and flood. GCF, is promoting the initiative for integration of Grey-green infrastructure that aims to pilot and implement a well-managed mix and integration of the Grey-Green Infrastructure to enhance the adaptability and resilience of coastal and upstream communities to climate change (Drought and Flooding) and mitigate energy-intensive grey infrastructure including increasing storage of carbon
Executive Summary	Table ES-1, hydrological study / water balances / modeling / monitoring, could also be mentioned as one of the actions under the pillar "transformation planning for IWRM".	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, hydrological study / water balances / modeling / monitoring, are mentioned in the body of the documents and are considered under pathway 2 for IWRM.
1. Introduction	In the context of climate action, transformations are needed in several areas where water plays an important role: urban development, agriculture, energy. It might be useful as an introduction to highlight how the proposed paradigm shifts affect these sectors.	State Secretariat for Economic Affairs SECO Development cooperation, Infrastructure Financing	Thank you for your comment, this discussed under several sections in the document.
1.1	It is important to define the water sector somewhere, as it is not so clear as for e.g. the transport sector or industry.  This would minimize the confusion: for example, as the guidelines focuses on water demand management, would projects financing alternatives to water use (e.g. dry toilets) fall under those guidelines? And where does the water sector end and the agriculture sector start?	Germany BMZ	Thank you for your comment, the water sector boundaries are related to the problem that is climate rational. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate at the scale of impacts.
1.1	It might be worth deleting the word "individual". Indeed, if a project has for instance a transboundary dimension, the priorities will be those of all the countries involved.	UNECE	Thank you for your comment, agreed and word removed

1.1	Proposed: This Sectoral Guide focuses on integrated water resources management and the basic services that depend on them, and addresses climate impacts....	Sanitation and Water For All (SWA)	Thank you for your comment, please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH
1.1	Proposed: This Sectoral Guide focuses on integrated water resources management and the basic services that depend on them, and addresses climate impacts....	UNICEF	Thank you for your comment, please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH
1.2	water security should be defined, and referenced- see UN Water 2013. Hence, the context should include all dimensions of water security; the dimension of Access to WASH services is not mentioned; data from JMP can support in providing the context for this component.	Stockholm International Water Institute (SIWI)	Thank you for your comment, please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH
1.2	Needs a specific para on WASH informed by JMP data. This should be used for example to help identify the most climate vulnerable populations at national and sub-national level.	UK FCDO	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including restoration and preservation of ecosystems and the services they provide
1.2	<p>The document is missing a fundamental point – change will only occur when development actors are able to work during and immediately after crisis. And, when humanitarian and development actors plan jointly for crisis.</p> <p>Of the top 30 countries facing water stress, 10 are already in a generalised form of crisis, usually humanitarian – Palestine, Lebanon, Jordan, Libya, Yemen, Iraq, Pakistan, Syria, Turkey and Afghanistan. It is likely the 700m potentially displaced by water could come from these countries. Heatwaves and changes in habitat will frequently affect those who are already the poorest.</p> <p>Development actors target poverty alleviation but it can be argued are systematically unable to work with the poorest. The FCV strategy of the World Bank is welcomed, but more must be done, including adequate consideration throughout this strategy.</p> <p>Planning ahead of crisis is founded upon the reality that increasingly humanitarian actors operate, maintain and even extend infrastructure during crisis. Dev, Hum and Gov should undertake more planning ahead of crisis in a way that is reflective of what has occurred before and future interests of all parties. This should be included in the planning sections of the document.</p>	UK FCDO	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including social benefits
1.2	The reference provided does has no mention of the words 'displaced' or '700m'	UK FCDO	Thank you for your comment, reference corrected.
1.2	We appreciate that this draft recognizes that the water sector can contribute to increased GHG emissions and that these contributions are often undercounted. However, it should also recognize that the areas identified here (energy production, industrial and agricultural production) also may have significant impacts on water security as well. It must also be acknowledged that wetlands act as significant carbon sinks, so disturbing them for human use will have important increases in emissions as a consequence. Thus, the GCF in funding in this sector should explicitly exclude projects that would disturb peatlands and wetlands. See also: <a href="https://www.frontiersin.org/articles/10.3389/fenvs.2020.00008/full">https://www.frontiersin.org/articles/10.3389/fenvs.2020.00008/full</a>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. The term is defined section 2.3.4
1.2	The statements on the carbon footprint (170-173) and GCG emissions (205 - 217) seem to be related to water supply and sanitation infrastructure (mainly associated with energy consumption). An existing challenge will be to focus on how to better incorporate green/gray balance of irrigation infrastructure in GCF proposals.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment. Please view Section 6 GCF Investment Criteria. Also note GCF is promoting the initiative for for integrated grey-green resilient infrastructure that aims to Pilot and implement a well-managed mix and integration of the Grey-Green Infrastructure to enhance the adaptability and resilience of coastal and upstream communities to climate change (Drought and Flooding) and mitigate energy-intensive grey infrastructure including increasing storage of carbon through promoting, designing and financing resilient grey-natural water infrastructure projects that demonstrated improvements to water and climate risk resilience (text added under pathway 2 IWRM)

1.2	This is precisely my point above. It should be linked like this from the get-go. This is the way to frame a "new paradigm".	World Bank	Thank you. The guide states "Demand management can be applied anywhere with strong gains in urban areas, buildings, agriculture, and industry through water conservation".
1.2	The footnote (13) used for estimating the cost of climate proofing makes some wrong assumptions. Foot note 13 (reference to <a href="https://www.nature.com/articles/s41545-019-0039-9">https://www.nature.com/articles/s41545-019-0039-9</a> ): Authors argue that those of us who suggest "Overpopulation arguments are "anti-poor", "anti-developing country" and "anti-human", and those who argue that looking at "Population size as a fundamental driver of scarcity is a "faulty notion" refuse to admit that "unbounded growth is unsustainable," an observation made in the 2018 world water development report. This faulty assumption enables the authors to undermine low cost solutions that seek to mimic nature, as we seek solutions such as agroecological approaches with minimal carbon footprint in water sector and minimal financial cost supporting IWRM. Suggest deleting the use of such an article for reference, that endorses anti-poor approach as it is not appropriate	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for the comments, text adjusted and reference removed.
1. Introduction	In addition to just listing the exorbitant costs, it's helpful to also describe/quantify the benefits. The World Bank's Lifelines report shows that every \$1 invested in Resilient Infrastructure (including Water) yields \$4 in benefits from avoided service disruption, etc.	World Bank	Thank you for your comment, text added and reference
2.1	We would suggest to include soil/land degradation due to flooding among the critical CC-triggered risks (as flooding leads to rapid siltation of water bodies). We would also suggest to include dam sedimentation.	Food and Agricultural Organization of the United Nations (FAO)	Thanks for your comments, agreed and text amended
2.1	As above (line 158) - no recognition that the countries affected by this change are often conflict prone.	UK FCDO	Thank you for your comment, text changed
2.1	Important to see what is computed as water stress and the weight of lack of access to water services versus lack of resource itself. (There are countries with abundant resources where access is still very limited).	UNICEF	Thank you for your comment. It is pointed out that Karachi began installing smart water meters in 2021
2.1	Important to see what is computed as water stress and the weight of lack of access to water resources versus lack of resource itself. (There are countries with abundant resources where access is still very limited). An important number to consider is the 2 billion people that lack access to safely managed drinking water (as per latest estimates of the WHO-UNICEF Joint Monitoring Programme). AND We need to mention the 2020 estimates for SANITATION: 3.6 billion people lacked safely managed services, including 1.9 billion people with basic services, 580 million with limited services, 616 million using unimproved facilities, and 494 million practising open defecation. <b>Important reflection:</b> How many of those 494 million live in high flood prone risk areas? As the combination of lack of sanitation and floods is deadly and makes populations living in the same watershed extremely exposed and vulnerable (to climate change). (this is just an example of the overlap between lack of access to basic services and exposure of communities to climate hazards).	Sanitation and Water For All (SWA)	Thank you for your comment. Please view Section 6 GCF Investment Criteria on projects needing to contribute to sustainable development, including social sustainability, such as gender equality, etc.
2.1	According to the IPCC, AR6 Working Group 2, "Roughly half of the world's population currently experience severe water scarcity for at least some part of the year due to climatic and non-climatic drivers (medium confidence)" (SPM B.1.3)	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, the reference of IPCC AR6 included. Please view Section 6 GCF Investment Criteria on projects needing to contribute to sustainable development, including social sustainability, such as gender equality, etc.
2.1	Droughts' negative impacts also include human rights impacts, including not only on the right to water itself, but also the right to life, food, health, etc. The sector guide should explicitly include reference to human rights along with the impacts already listed (economic, environmental, and social).	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including reducing water-energy-food nexus pressures
2.1	There is limited recognition of the role of biological sanitation which frequently does not use energy.	UK FCDO	Thank you for your comment. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those of an EbM nature, and the multiple co-benefits they provide

2.1	<p>Missing GHG : Methane</p> <p>It is well understood that methane is released as a by-product of anaerobic wastewater treatment and in September 2021 a McKinsey report identified wastewater management as one of five industries collectively contributing 98% of anthropogenic methane emissions (estimating municipal wastewater represents 7-10%). In 2010, an estimated 512 million metric tonnes (MMTCO) of methane were released from municipal wastewater treatment, accounting for approximately 7% of total global methane emissions.</p> <p>Methane is a short-lived climate pollutant, oxidising and dispersing within a decade, in contrast to carbon dioxide which persists for hundreds of years. However, its molecular structure gives it 84 times the warming effect of CO2.</p>	Stockholm International Water Institute (SIWI)	Thank you for your comment. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those of a methane reduction such as wastewater, EbM nature, and the multiple co-benefits they provide
2.2	In the "Global baseline" (p.12), we would suggest including 'conflict' as one of the "non-climatic challenges to achieving water security for both humans and the environment". Conflict has direct, indirect and cumulative impact on water services, with consequences that go beyond the water sector (public health, livelihoods, displacement,...)	International Committee of the Red Cross (ICRC)	Thanks for your comment, agreed and text reworded and added
2.2	We would recommend to add other challenges including, socioeconomic development, environmental land degradation, competition for available freshwater resources, inefficient/poor infrastructure (in addition to aging), complex geopolitical and economic environments (uncertain energy prices), improved attention to environmental issues, weak institutional frameworks, etc.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, these elements mentioned in the sector guide in other locations.
2.2	<p>As access to water and sanitation is a key dimension to Water Security (as per UN Water definition used in this guides) there is a need for an additional point to set the "Global baseline: where is the sector today?":</p> <p>Water-sanitation-hygiene (WASH): In 2020, 2 billion people lacked safely managed services, including 1.2 billion people with basic services, 282 million with limited services, 367 million using unimproved sources, and 122 million drinking surface water. There are no estimates as to how many of those live in drought prone areas, but such services will have to be planned, built and managed considering the impacts of climate change. Similarly, in 2020, 3.6 billion people lacked safely managed services, including 1.9 billion people with basic services, 580 million with limited services, 616 million using unimproved facilities, and 494 million practising open defecation. There are no estimates as to how many of those live in flood prone areas, but such services will have to be planned, built and managed considering the impacts of climate change.</p>	Sanitation and Water For All (SWA)	Thank you for your comment. These information discussed and presented under section 1.2 where water security discussed from sector perspectives.
2.2	<p>As access to water and sanitation is a key dimension to Water Security (as per proposed UN Water definition used in this guides) there is a need for an additional point to set the "Global baseline: where is the sector today?":</p> <p>Water-sanitation-hygiene (WASH): In 2020, 2 billion people lacked safely managed services, including 1.2 billion people with basic services, 282 million with limited services, 367 million using unimproved sources, and 122 million drinking surface water. There are no estimates as to how many of those live in drought prone areas, but such services will have to be planned, built and managed considering the impacts of climate change. Similarly, in 2020, 3.6 billion people lacked safely managed services, including 1.9 billion people with basic services, 580 million with limited services, 616 million using unimproved facilities, and 494 million practising open defecation. There are no estimates as to how many of those live in flood prone areas, but such services will have to be planned, built and managed considering the impacts of climate change.</p>	UNICEF	Thank you for your comment. These information discussed and presented under section 1.2 where water security discussed from sector perspectives.
2.2 Global Baseline	One missing challenge that the water sector is facing: 2 billion people lack access to safely managed water supplies. These people are by definition water insecure, many are also climate vulnerable.	UK FCDO	Thank you for your comment. These information discussed and presented under section 1.2 where water security discussed from sector perspectives.
2.2	I would suggest to add this under population growth and/or rapid economic growth. This is not a climate-change impact.	UNDP	Thank you for your comment, increasing demand could be triggered by climate change during drought as an example
2.2	Same, this might be a better fit under rapid urbanization or rapid economic growth	UNDP	Thank you for your comment, increased contamination due to poor water quality could be triggered by climate change during flood as an example
2.2	A point could also reflect on the huge disparities in access to water supply and sanitation in urban centres versus rural populations. For sanitation in 2020: Two thirds of people who still lacked even basic services lived in rural areas. Nearly half of them lived in sub-Saharan Africa. 92% of the population practising open defecation lived in rural areas. For water supply in 2020: Eight out of ten people who still lacked even basic services lived in rural areas. Around half of them lived in Least Developed Countries.	Sanitation and Water For All (SWA)	Thank you for your comment, please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH
2.2	A point could also reflect on the huge disparities in access to water supply and sanitation in urban centres versus rural populations. For sanitation in 2020: Two thirds of people who still lacked even basic services lived in rural areas. Nearly half of them lived in sub-Saharan Africa. 92% of the population practising open defecation lived in rural areas. For water supply in 2020: Eight out of ten people who still lacked even basic services lived in rural areas. Around half of them lived in Least Developed Countries.	UNICEF	Thank you for your comment, please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH

2.2	As mentioned earlier: dietary changes are also an important of using water more efficiently. Keeping livestock for meat production requires water by itself, but in particular indirect water use through the inefficient conversion from fodder to meat takes a lot of water	Germany BMZ	Thank you. The text is been revised
2.2	Suggest adding ecosystem functions, services and biodiversity loss	UNDP	Thank you. The text is been revised
2.2	Due to loss of habitat? Advise to clarify how biodiversity loss relates to water security	UNDP	Thank you. The text is been revised
2.2	Water and environment? Beyond biodiv? Pollution ? Closing basins?	Stockholm International Water Institute (SIWI)	Thank you for your comment
2.2	The loss of biodiversity is well highlighted but not well reflected in the recommendations (the tables on page 31 and page 38 mention "Ecosystem-based Management"). Sanitation projects through wastewater treatment contribute to the preservation and/or rehabilitation of natural ecosystems.	AFD	Thank you for your comment. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those of an methane reduction such as wastewater, wash, EbM nature, and the multiple co-benefits they provide
2.3	The SDGs are premised on enhancing inclusive development and equality, while SDG6 is also focused on community participation. A section discussing 'where the water sector needs to be' should therefore recognize these social goals as well.	Both ENDS	Thank you for your comment. Please view Section 6 GCF Investment Criteria on projects needing to contribute to sustainable development, including social sustainability and water equality
2.3	Some adaptive strategies include having a more secured access to water resources. For example, in Sahelian countries, population growth and increased unreliability of rainfalls (more frequent droughts, intense rainfalls, shorter rainy seasons...), mean more water will be needed than what is currently available. While ecosystem restoration, improved water demand management can reduce the vulnerability, in some cases, groundwater extraction might be the only effective solution (or re-locating to other areas).	UNDP	Thank you for your comment and agreed. Pathway 2 calling for strengthening IWRM including integrated adaptive planning and management (Sections 2.3.6 and 3.2.2)
2.3	A suggestion would be to add here some ideas/examples on reducing water-related climate vulnerability in rural areas. We do talk about urban areas under demand management, but there are quite a few projects that target communities in rural areas too.	WFP	Thank you for the comments, texted amended and the guide states "Demand management can be applied anywhere with strong gains in urban and rural areas, buildings, agriculture, and industry through water conservation" with example under alternative water supplies. All projects, including those involving reducing water-related climate vulnerability in rural areas will be assessed against the GCF investment criteria, section 6
2.3	some avenues for Adaptation are not included into the options. According to IPCC Fifth Assessment Report (AR5) suggests that the most effective actions to reduce vulnerability in the short-term relate to the implementation of "basic public health measures such as provision of clean water and sanitation... and alleviate poverty (very high confidence)". Hence provision of WASH services in areas that become under risk due to climate change hazards is another critical avenue for adaptation that could be included in the text. In addition, creating adaptive capacity through water governance systems strengthening and capacity development at all levels is another critical element for reducing vulnerability and improving adaptation.	Stockholm International Water Institute (SIWI)	Thank you for your comment, please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH, water governance systems strengthening and capacity development
2.3	Consider using ecosystem based adaptation (EbA) or NbS if the intent is the enhancement of sustainable ecosystem management for supporting resilience and adapting to climate change (NbS also has mitigation benefits).	UNDP	Thank you for your comment. the concept of EBM defined under section 2.3.4. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those of an methane reduction such as wastewater, wash, EbM nature, and the multiple co-benefits they provide
2.3	What is meant here is Ecosystem based Management? Preferably introduce the term and add the abbreviation in brackets as EbM can be understood as ecosystem-based mitigation as well.	KfW	Thank you for your comment. the concept of EBM defined under section 2.3.4. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those of an methane reduction such as wastewater, wash, EbM nature, and the multiple co-benefits they provide
2.3	What is meant here is Ecosystem based Management? Preferably introduce the term and add the abbreviation in brackets as EbM can be understood as ecosystem-based mitigation as well.	GIZ	Thank you for your comment. the concept of EBM defined under section 2.3.4. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those of an methane reduction such as wastewater, wash, EbM nature, and the multiple co-benefits they provide

2.3	Demand management: We would suggest that any water-use efficiency measure be considered in parallel with impacts on environmental quality.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, agreed. Please view section 6 GCF Investment criteria. The guide states "Demand management can be applied anywhere with strong gains in urban and rural areas, buildings, agriculture, and industry through water conservation". All projects, including those involving reducing non-revenue water will be assessed against the GCF investment criteria, section 6
2.3	In the section on "Demand management", no differentiation is made between business/industrial use and household/individual use of water throughout the guide; this is a significant shortcoming and should be remedied.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, agreed. Please view section 6 GCF Investment criteria. The guide states "Demand management can be applied anywhere with strong gains in urban and rural areas, buildings, agriculture, and industry through water conservation". All projects, including those involving reducing non-revenue water will be assessed against the GCF investment criteria, section 7
2.3.1	In the water demand management approach (§2.3.1; §3.2.1), the focus is on behaviour change at the level of individual consumers. Incentive systems at the sectoral level may be more effective, and may even be necessary to ensure that changes are sustainable.	State Secretariat for Economic Affairs SECO Development cooperation, Infrastructure Financing	Thank you for your comment, agreed. Please view section 6 GCF Investment criteria. The guide states "Demand management can be applied anywhere with strong gains in urban and rural areas, buildings, agriculture, and industry through water conservation". All projects, including those involving reducing non-revenue water will be assessed against the GCF investment criteria, section 8
2.3.1	This provides co-benefits: the reduction of water loss results in the need to pump less water which enables saving electricity costs and might support a reduction of GHG emissions (depending on the energy source used).	GIZ	Thank you for your comment, agreed and this is highlighted under pathway 1 including non-revenue water. All projects, including those involving reducing non-revenue water will be assessed against the GCF investment criteria, section 8
2.3.1	Demand management provides co-benefits: the reduction of water loss results in the need to pump less water which enables saving electricity costs and might support a reduction of GHG emissions (depending on the energy source used).	KfW	Thank you for your comment, agreed and this is highlighted under pathway 1 including non-revenue water. All projects, including those involving reducing non-revenue water will be assessed against the GCF investment criteria, section 9
2.3	Water Demand Management also requires to look at and govern Water -Energy-Agriculture Nexus	Stockholm International Water Institute (SIWI)	Thank you for your comment, All projects, including those involving reducing water-food nexus challenges will be assessed against the GCF investment criteria, section 6. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Projects are welcome in demand management and developing alternative water supplies and may address the water-food nexus
2.3	This section is naively optimistic in its praise of digital technologies. We recommend including a section that discusses potential risks and threats associated with such technologies (costs, data insecurity etc.)	Both ENDS	Thank you for your comment, barriers for the technologies including smart digital water management discussed under the barriers section.
2.3.2	Is this feasible in most parts of the world? It seems like a lot of baseline information needs to be collected to be able to achieve these investments, particularly in the least developing world. Would GCF be interested in financing this baseline information (in most countries there is no big data available and the data base would have to be built taking various years).	UNDP	Thank you for your comment, baseline information can be funded through the project preparation fund for project where country can request up to 1.5M per project, for baseline, feasibility studies and other emergent information required for the project to be fully assessed
2.3.2	We have a major concern on this part. Smart digital water management can foster a better water demand management. However, we are sceptical about its relevance for GCF priority countries (LDCs, SIDS and Africa) which often lack the infrastructure, experience and data for such solutions. Big data-driven technologies require efficient data infrastructure. However, study of local data (not necessarily digitally integrated) could already improve data management.  An improvement of this section could be to first focus on the use of data for water management (e.g. use of statistics such as meteorological data, water consumption statistics...) and then naming Internet of Things and smart digital management as a possibility.	Germany BMZ	Thank you for your comment. We see the value for smart water technologies to equip countries in resolving water challenges in different contexts where can result in reducing energy consumption and carbon emissions

2.3	The use of the Internet of Things (IoT), blockchain technology plus smart contracts, and AI are indeed innovative tools for resolving water challenges in different contexts. However, lessons learned have shown that there's a lack of international standards, guidelines and regulations with regard to blockchain technology. Even the Blockchain and Climate Institute (BCI) and the FAO have admitted to this. Secondly, the issues of interoperability and governance: How is stakeholder engagement and an inclusive stakeholder process (with the meaningful and comprehensive participation of local communities and Indigenous People and women) possible? How will gender inclusion and ESS be incorporated when using the blockchain technology? Also, the issues of internet access and internet stability as well as the danger of disrupted power supply, in particular for LDCs and SIDS, raise the question of the effectiveness of the abovementioned technology.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	GHG emissions are discussed. For example, "Demand reduction lowers GHG emissions by transporting less water and treating less wastewater, whereas all new supply-side measures result in an increase in GHG emissions".
2.3	We would suggest to include Managed Aquifer Recharge (MAR) as one of the "alternative water supplies"	Food and Agricultural Organization of the United Nations (FAO)	Thanks for your comments and agreed. we have added one section dedicated for MAR
2.3.3	How about alternatives to water demand (e.g. dry toilets, dry farming...)?	Germany BMZ	Thank you for your comment, It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
2.3.3	There is a replication of water reuse and recycling here and in the circular economy section 2.3.5?	UNDP	Thank you for your comment
2.3	It is recommended that nature-based solutions (which includes Ecosystem-Based Management and Integrated Water Resources Management approaches) be referenced as an approach that could go further in providing multiple co-benefits to the water sector.	Global Affairs Canada	Thank you for your comment, noted.
2.3	2.3.4. EbM: We would also suggest to include forest management, reforestation, PES, adoption of broad land-based interventions such as conservation agriculture.	Food and Agricultural Organization of the United Nations (FAO)	Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those NBS, including EbM and green infrastructure, and the multiple co-benefits they provide. The projects will be assessed against the GCF investment criteria, section 6
2.3	Under this section, with reference to Ecosystem based management, references to FAO's 10 elements on agroecology ( <a href="https://www.fao.org/agroecology/overview/overview10elements/en/">https://www.fao.org/agroecology/overview/overview10elements/en/</a> ) and UN HLPE Water for Food Security ( <a href="http://www.fao.org/3/av045e/av045e.pdf">http://www.fao.org/3/av045e/av045e.pdf</a> ) Reports' 13 agroecological principles ( <a href="https://www.ipes-food.org/_img/upload/files/sfsENhq.pdf">https://www.ipes-food.org/_img/upload/files/sfsENhq.pdf</a> ) should be added, as they both emphasize creating synergies between beneficial ecological processes contributing to climate resilience and water conservation in the agroecosystem, reducing water footprint of agriculture. <a href="https://www.fao.org/agroecology/overview/overview10elements/en/">https://www.fao.org/agroecology/overview/overview10elements/en/</a> <a href="https://www.ipes-food.org/_img/upload/files/sfsENhq.pdf">https://www.ipes-food.org/_img/upload/files/sfsENhq.pdf</a> Also, to provide a specific focus on the agriculturally intensive state of Iowa provides insight into how land use centered on agroecological principles affords greater water resilience, for individual farms as well as for broader community and ecosystem health. See: <a href="https://www.tandfonline.com/doi/full/10.1080/21683565.2017.1330795">https://www.tandfonline.com/doi/full/10.1080/21683565.2017.1330795</a>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those NBS, including EbM and green infrastructure for urban and rural areas including upstream and downstream users, and the multiple co-benefits they provide. The projects will be assessed against the GCF investment criteria, section 6
2.3	We welcome the inclusion of "ecosystem-based management" (EbM) as one of the approaches to achieve paradigm shift in water security as well as integrating EbM for Integrated Water Resource Management. However, there is no mention of "community-based water management" and "locally-led adaptation" in this document. This best practice should be included in Pathway 2 as the document highlights the importance of empowering and building the capacity of local communities, IPs and women in water security. Respective references should be added to Figure ES-1 (page 9, line 32) and Figure 3 (page 25, line 665), by including a new bullet point in column: "Transformational planning and programming" for the paradigm-shifting pathway on "Strengthening integrated water resources management and water management" to read: "Improve community-based water management using locally led adaptation in IWRM for water security interventions at the local level."	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those NBS, including EbM and green infrastructure for urban and rural areas including upstream and downstream users, and the multiple co-benefits they provide. The projects will be assessed against the GCF investment criteria, section 6
2.3	Here the GCF water sector strategy will be well served by noting that the Circular Bioeconomy, which results from a symbiosis between Ecology and Economy, adopts a series of principles that it shares with Agroecology: using renewable resources, maximizing efficiency in the use of resources and maximum possible utilization of waste. Agroecology and circular bio-economy: <a href="https://www.researchgate.net/publication/351633920_Agroecology_and_Circular_Bioeconomy">https://www.researchgate.net/publication/351633920_Agroecology_and_Circular_Bioeconomy</a>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those NBS, including EbM and green infrastructure for urban and rural areas including upstream and downstream users, and the multiple co-benefits they provide. The projects will be assessed against the GCF investment criteria, section 6

2.3	The idea of 'regenerating natural capital' should focus on, or at least mention, the provisioning of ecosystem functions and services in relation to the sustainable use of biodiversity.	Convention on Biological Diversity	THanks for your comments, please note there is a sector guid for forest that discussed all these aspects. In the ater sector, the linkage is clear to ecosystem where detials of activities are discussed in the forest sector guide. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits projects, including those NBS, including EbM and green infrastructure for urban and rural areas including upstream and downstream users, and the multiple co-benefits they provide. The projects will be assessed against the GCF investment criteria, section 6
2.3.5	Protects. This section needs to be detailed further. There are several examples of ecosystem approaches where the benefits are derived by cities by protecting catchment forests (E.g. NY and Catskills watershed), where the benefits are water quality, savings to the municipalities, etc. This is in addition to flood risk reduction/mitigation.	UNDP	Thank you for your comment, the word corrected to protect.
2.3	Table 2: as part of Climate Actions, the institutional and policy aspects may also be considered. In implementing water-use efficiency measures, explicit allocation policies are recommended to direct efficiency gains to desired beneficiaries. Water-use efficiency should be backed up with carefully assesed policies and regulatory measures.	Food and Agricultural Organization of the united Nations (FAO)	Thank you for your comment, agreed. This issue discussed under the pathway2 (strengthening IWRM) where it focus on adpatation and pay more attention to insitituional, policies and water governance.,
2.3	Under the heading 'Restore': Disaster risk reduction should be included as an adaptation measure. The restoration of soils and coastal ecosystems can contribute to adaptation and disaster risk reduction, while also contributing to EbM (as mentioned already). *EbM protects communities	Convention on Biological Diversity	Thank you for your comment, and text corrected and added
2.3	Agreed on the need for IWRM , but would integrate in that context specific Water Energy Food Environment nexus management.	Stockholm International Water Institute (SIWI)	Thank you for your comment, noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate. Projects are welcome in IWRM, demand management and developing alternative water supplies and may address the water-food nexus
2.4	This section should include or make reference to the cost of inaction for restoring water systems.	Convention on Biological Diversity	Thank you for your comment, and noted. Cost information added including the benefit of investment.
2.4	Who is paying these costs? And why are they not investing to avoid this cost? Can we make a link there between the investors and the payers?	Stockholm International Water Institute (SIWI)	Thanks for your comment, well noted and linkage established and highlight the lack of investment case and the role of GCF to mobilize the private sector. This has been done in many locations along the document.
2.4	I believe \$114Bn refers to annual capex needed to achieve SDG6 WASH targets 6.1 and 6.2 (not the entirety of SDG 6). See: <a href="https://openknowledge.worldbank.org/bitstream/handle/10986/23681/K8543.pdf?sequence=1&amp;isAllowed=y">https://openknowledge.worldbank.org/bitstream/handle/10986/23681/K8543.pdf?sequence=1&amp;isAllowed=y</a>	UK FCDO	Thanks for your comment, information corrected.
2.4	Barrier includes weak institutions and regulation which add risk for potential investors	UK FCDO	Thanks for the comment and agreed. Insituational barrier discussed under the barriers section.
2.4	Table 3: Barriers to financing water security: It is suggested to include weak Quality Management as one of the barriers to financing water security. One of the key bottlenecks of the sector in the SSA context is the absence of or a weak system of early detection/prevention of faulty studies/design as well as faulty construction, which often leads to costly, poor quality and delayed implementation of infrastructure/technology. By corollary, items from line 340 to 353, are suggested to be revised to address this challenge in line with its objective of creating an enabling investment environment to bring the claimed paradigm shift, and be further reflected in related sections such as line 552 and 584. The required support could also be linked to the Technical Assistance - Blended Finance coming with grant support to SSA countries as mentioned on page 862.	Food and Agricultural Organization of the united Nations (FAO)	Thanks for the comment, All barriers discused under the barrier sector for water security.. In table 3, only focus on barrier to finance as complementray for the previous section, where poor quality and integrity included..
2.4	(to be added) Water sector is a corruption prone sector with estimates of corruption costs between 20% and 50% of the investments	Stockholm International Water Institute (SIWI)	Thank you for your comment, integrity and transparency mentioned.
2.4	The lack of credit worthiness is a huge barrier....and in most cases is the main challenge for financing any water investments. This seems to be missing from the table.	World Bank	Thank you for your comment, well noted and included

3.1	To attract more financing by improving the risk-return profile of water investments, it was suggested that "governments can employ a range of fiscal policy instruments to recover the costs of investment from users". This suggestion has serious implications on users from the lowest wealth quintile, including poor and vulnerable communities, Indigenous Peoples, female headed households and smallholder farmers. The issue of affordability may deprive them from having access to clean water in their homes and in their community.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment and noted. GCF, promoting the initiative that aims to treat water as "a new asset class" for water reuse and sanitation, using credit enhancement towards developing debt capital market and acceptable financial returns but remain in line with ESG impacts and the Paris Agreement and contribute to UN SDGs that will allows municipalities and private sector to scale up water reuse projects and/or governments purchase a service instead of an asset.
2.4	+ more effective and efficient financial and operational management, better accountable and participative governance,	Stockholm International Water Institute (SIWI)	Thanks for comment, agreed and text reworded and included
3.1	The integration of actions related to water security in the national strategies (NDCs), as noted in tables 4 and 8 as examples, is critical.	State Secretariat for Economic Affairs SECO Development cooperation, Infrastructure Financing	Thank you for your comment, well noted.
3.1	Not only reducing risks but increasing returns on investing in water projects (under "mobilizing finance at scale")	KfW	Thank you for your comment, well noted.
3.1	Perhaps an option to also think about philanthropy? They are often interested in supporting water projects in developing countries.	Germany BMZ	Thank you for your comment
3.1	We would suggest to include in the preceding section/s a background and context description of transboundary operations and cooperation (which appeared for the first time in the document as an output under Table 4).	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment and noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including reducing transboundary conflicts over scarce water resources. Section 6 provides the GCF Investment criteria for impactful proposals
3.1	The reference to "BECAUSE the financial viability of new asset classes in water security will be demonstrated" under outcomes for MFS should be stricken. It is not the role of the GCF as part of the financial mechanism of the UNFCCC with the focus on providing concessional finance to developing countries to engage in creating or promoting new asset classes for water security.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, Resilient water infrastructure and resilient water services are internationally recognised terms in the water sector. GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, and climate-resilient pathways. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide. The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America. The GCF is endeavouring to mobilising the private sector to invest in water sector through a number of initiatives including treating water as a new asset class that consider credit enhancement and acceptable revenue stream inline with ESG, Paris agreement and SDGs.

3.1	<p>The GCF seems to want to turn water into an asset class, as stated in this table but also in the way water security is addressed throughout the guide. There is no mention about the potential impact of such actions on pollution and depletion. How does the GCF intend to balance this idea with access to water being a human right? How does the GCF intend to address the issue of projects financed with GCF money resulting in privatization of water resources and services and the possibility of this resulting in access being limited for vulnerable communities? See on the concerns raised by the Office of the High Commissioner on Human Rights (OHCHR) with respect to water as an asset class:  <a href="https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=26595&amp;LangID=E">https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=26595&amp;LangID=E</a>  For concerns related to water futures, see also: <a href="https://www.iatp.org/blog/202103/futurizing-water-prices-how-why-and-who-may-benefit">https://www.iatp.org/blog/202103/futurizing-water-prices-how-why-and-who-may-benefit</a></p>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	<p>Thank you for your comment, Resilient water infrastructure and resilient water services are internationally recognised terms in the water sector. GCF is mandated to support developing countries raise and realize their NDC ambitions towards low-emissions, and climate-resilient pathways. The GCF focuses geographically on the least developed countries, SDIS, Africa, Asia and Latin America. The GCF is endeavouring to mobilise the private sector to invest in water sector through a number of initiatives including treating water as a new asset class that consider credit enhancement and acceptable revenue stream in line with ESG, Paris agreement and SDGs. Concept notes, in all areas, including water resources management, will be assessed on their mitigation/adaptation potential and the multiple benefits they provide along the GCF investment criteria (section 6).</p>
3.1	<p>Table on Theory of Change  Mobilising finance at scale:  This is the section where the comments above (2nd general comments) should be addressed and provide more clarity on how access to finance will be made available and benefit smaller actors (women's organizations, local communities, Indigenous Peoples).</p>	Global Affairs Canada	<p>Thank you for your comment and well noted. Mobilising finance at scale has also been discussed under the role of GCF in section 3.5</p>
3.1	<p>The WASH sector reads with concern the narrow framing described in the Goal Statement with "(i) water conservation; and (ii) preservation of water" as these do not represent adequately the adaptation needs and mitigation opportunities of the WASH sector, particularly when looking at the ultimate goal of increasing community resilience by assuring they have climate resilient water and sanitation services</p>	UNICEF	<p>Thank you for your comment, It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.</p>
3.1	<p>The WASH sector reads with concern the narrow framing described in the Goal Statement with "(i) water conservation; and (ii) preservation of water" as these do not represent adequately the adaptation needs and mitigation opportunities of the WASH sector</p>	Sanitation and Water For All (SWA)	<p>Thank you for your comment, It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.</p>
3.1	<p>The Theory of change could make an effort to make specific mention to "sanitation". There are clear entry points such as:  · IF the knowledge of best practices and lessons learned from GCF funded water AND SANITATION projects are disseminated. ....  · Incorporate water security AND SANITATION into NDCs and NAPs. ....  · Adopt climate smart water AND SANITATION management practices  · Enhance water AND SANITATION infrastructure technologies and approaches  · Scale-up blended finance into water security AND SANITATION interventions</p>	UNICEF	<p>Thank you for your comment, It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.</p>
3.1	<p>The Theory of change could make an effort to make specific mention to "sanitation". There are clear entry points such as:  · IF the knowledge of best practices and lessons learned from GCF funded water AND SANITATION projects are disseminated. ....  · Incorporate water security AND SANITATION into NDCs and NAPs. ....  · Adopt climate smart water AND SANITATION management practices  · Enhance water AND SANITATION infrastructure technologies and approaches  · Scale-up blended finance into water security AND SANITATION interventions</p>	Sanitation and Water For All (SWA)	<p>Thank you for your comment, It is noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.</p>
3.1	<p>The goal statement makes no reference to issues of inclusion, (gender) equality or human rights, which is an odd omission considering the overall objectives of the SDGs and the document's recognition of water as a human right. Therefore we recommend including these issues into the goal statement (and ToC)</p>	Both ENDS	<p>Thank you for your comment, section 6 where GCF's investment criteria discussed, has made a very clear linkage to gender and including as it is a key criteria under ESS safeguard.</p>
3.1	<p>Is the use of the term 'Build Back Better World' appropriate in this context? Surely it has a particular political significance.</p>	UK FCDO	<p>Thanks for your comment.</p>

3.2	The two pathways are described in a confusing and unconvincing manner. For instance the implied relationship between IWRM and water preservation is unclear.	Both ENDS	Thank you for your comment and noted. Please note, The second pathway "Strengthening integrated water resources management and water management" encompasses climate proofing of the water infrastructures promoting preservation of water at each step of the water cycle, by maximising technological, institutional, and financial innovation and supporting principles of a circular economy. Specifically, this includes the preservation of water resources, water supply including from new sources, and protection from water related hazards. It also, valuing local and traditional knowledge in decision-making and recognising the need for widespread community support contributes to cultural preservation.
3.2	The focus on demand management and efficiency misses one of the most immediate and potentially consequential sources of GHG emissions reductions in the water sector - methane and nitrous oxide from sanitation. This is a significant omission and one where transformational opportunities exist.  Also, in both of the pathways included in this section, the decision maker or entity tasked with implementing these recommendations seems absent. This is related to the comment above. Is it the utility for Pathway 1 and the WRM agency for Pathway 2? This is important because it signals who the development institution should be working with and/or who in the government is responsible for implementing these actions.	World Bank	Thank you for your comment and well noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Demand management projects are expected to result in permanent water savings and potential GHG emission reduction including Non-revenue water, demand management and developing alternative water supplies and may address the water-food nexus. Section 6 provides the GCF Investment criteria for impactful proposals where all concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
3.2	Not sure what is meant here: Water security induced by water scarcity? Water scarcity refers to the lack of sufficient available water resources.	KfW	Water security is a broader term compared to water scarcity. Please refer to the definition in the executive summary
3.2	Unclear statement. Water security induced by water scarcity? Water scarcity refers to the lack of sufficient available water resources.	GIZ	Water security is a broader term compared to water scarcity. Please refer to the definition in the executive summary
3.2	It is difficult that the adaptation needs of the WASH sector are fully realized only under these approaches to water demand management. It is true that demand management makes more water resources available for uses, including human consumption, but the adaptation needs for WASH go beyond having more water available. It is the resilient access that helps decrease the exposure of population and reduces vulnerability.	Sanitation and Water For All (SWA)	Thank you for your comment, please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH
3.2	It is difficult that the adaptation needs of the WASH sector are fully realized only under these approaches to water demand management. It is true that demand management makes more water resources available for uses, including human consumption, but the adaptation needs for WASH go beyond having more water available. It is the resilient access that helps decrease the exposure of population and reduces vulnerability.	UNICEF	Thank you for your comment, please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH
3.2.1	This is very good and important, please make sure to keep this in.	Germany BMZ	Thank you for your comment, well noted
3.2.1	We should be careful about not assuming this is a case everywhere. As mentioned earlier, some regions do/will face water scarcity even when waste is avoided. These regions are some of the most vulnerable to the impacts of CC	UNDP	Thank you for your comment, well noted
3.2	'Green' infrastructure must also be included. Natural/green infrastructure offers multiple benefits compared to single purpose grey infrastructure, and are often more effective in terms of cost, longevity and effectiveness. See <a href="https://www.conservation.org/projects/green-gray-infrastructure">https://www.conservation.org/projects/green-gray-infrastructure</a> for more information.	Convention on Biological Diversity	Thank you for your comment and well noted and agreed. Text added to elaborate and reflect to GCF's initiative on pilot and implement a well-managed mix and integration of the Grey-Green Infrastructure to enhance the adaptability and resilience of coastal and upstream communities to climate change (Drought and Flooding) and mitigate energy-intensive grey infrastructure including increasing storage of carbon through promoting, designing and financing resilient grey-natural water infrastructure projects that demonstrated improvements to water and climate risk resilience

3.2	<p>Is this not about improved management of watersheds, to reduce degradation and improve recharge and surface flows? If this is not intended here, then suggest that an additional pathway is the inclusion of nature based approaches/solutions to improve water use/create more resilience in the system. Please see: <a href="https://wwf.panda.org/discover/our_focus/freshwater_practice/bankable_projects/">https://wwf.panda.org/discover/our_focus/freshwater_practice/bankable_projects/</a></p> <p>Nature Based Solutions: <a href="https://www.iucn.org/theme/nature-based-solutions/resources/iucn-global-standard-nbs">https://www.iucn.org/theme/nature-based-solutions/resources/iucn-global-standard-nbs</a></p>	UNDP	Thank you for your comment and well noted. Also, note a section for MAR included.
3.2	FAO suggests to include the introduction of water pricing that observes the ability & willingness to pay, among others.	World Bank	Thank you for your comment
3.2.1	The new paradigm should use demand management to improve the equity of water provision, otherwise it will not address the fact that huge number of poor people rely on very little water – less than the SPHERE minimum standard in many cases. Such people – probably over a billion of them – are acutely vulnerable to water insecurity caused by climate change – see earlier point about Climate Resilient WASH needing to be included as a third pathway. Saving water will not in itself improve climate resilience, demands management also concerns how it is allocated.	UK FCDO	Thank you for your comment. Please view Section 6 GCF Investment Criteria on projects needing to contribute to sustainable development, including social sustainability. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including social benefits
3.2	In the section on “Demand management”, no differentiation is made between business/industrial use and household/individual use of water throughout the guide; this is a significant shortcoming and should be remedied. In this context, the reference to “reducing non-revenue water” is concerning, as there should be a difference between revenue raising for water provided for business activities vs. water provided to fulfill basic human needs.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate. Projects are welcome in IWRM, demand management and developing alternative water supplies and may address the water-food nexus
3.2	together with with the creation fo "new" water ... it is recommended to guarantee security that it is oriented to the ones more in need ... most insecure. and not oriented towards the richest. Hence there is the need to have intelligence on Political Economy and to strengthen the governance. I would definitely add some lines on "water governance " here!	Stockholm International Water Institute (SIWI)	Thank you for your comment, The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including strengthening governance. Please view Section 6 GCF Investment Criteria and also note there is a dedicated section for water governance
3.2	Similarly to comment 17 above, we would suggest to describe in greater detail (background/context) the connection of Small Islands Developing States and Least Developed Countries (e.g., regional dialogues) with New Water Supply Sources.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment and noted with example now added from Asia-Vietnam and Africa.
3.2	Why include a statistic from the U.S. It's more appropriate to have an indicative example of what this would mean in developing countries.	World Bank	Thank you for your comment and noted with example now added from Asia-Vietnam and Africa.
3.2.1	Could GCF refer instead to an example from a developing country, preferably in Africa, in line with its mandate.	UK FCDO	Thank you for your comment and noted with example now added from Asia-Vietnam and Africa. The intention of using example of developed countries to show best practices
3.2	Again, why is the document not citing real examples from developing countries, given that GCF finance is directed to these countries? Can't something be pulled from the case study examples that appear at the end of the document?	World Bank	Thank you for your comment and noted with example now added from Asia-Vietnam and Africa.
3.2	hence Water demand management = "energy demand management"	Stockholm International Water Institute (SIWI)	Thank you for your comment. Water demand management under integrated water resource management need to consider the energy demand as well to avoid intensive energy use.
3.2	Water Re-use: As water re-use intensifies, environmental trade-offs are inevitable. The means to account for water quality changes resulting from efficiency measures will need to be monitored with more frequency and precision. We would suggest this be reflected in this section.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, All projects, including those involving water re-use systems will be assessed against the GCF investment criteria, section 6
3.2	Water Efficiency: In order to implement water-use efficiency measures, explicit allocation policies to direct efficiency gains to desired beneficiaries are necessary. Systems of water use are multi-purpose and multi-functional so that the often-complex cascade of use, consumption, and re-use inevitably leads to a set of environmental trade-offs that have to be appraised and negotiated. We would recommend further detailing this in the section.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, All projects, including those involving water re-use systems will be assessed against the GCF investment criteria, section 7

3.2	The Guide recognizes agriculture as the largest water user in lines 239-241. There is a huge potential to improve significantly the agricultural water use efficiency from the current level - 50%. Unless agricultural water use efficiency is significantly improved, water scarcity challenges will remain. We suggest to indicate solutions to address the inefficient use of agriculture water in this section.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, agreed. Text amended and added as required.
3.2	In discussing the consideration of the "true cost of water", a strong differentiation must be made between industrial/business use and household/individual use; while public subsidies will by necessity have to take up some of the "hidden true costs" of water to ensure affordability and accessibility to water and sanitation as human rights for individuals, the same human rights obligation does not apply to the private sector, which, when privatizing profits, should not benefit from public goods pricing for water inputs (see for example the case of bottling municipal/public water for sale).	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, noted. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
3.2.1	This figure does not show the cost of ecosystem management to ensure the functionality of hydrological cycle. Suggestion - look for figures that considers this because it is crucial for the EbM solutions. This can be linked to the Pathway 2 on IWRM.	GIZ	Thank you for your comment, figure 2 represent an example of the hidden cost for GW.
3.2	This is the component that relates to WASH mostly. As suggested above it would be good to reflect this more clearly in the name of the "pathway" and brand as "Strengthen integrated water resources and water supply and sanitation services".	UNICEF	Thank you for your comment and well noted. We have adopted the name "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services"
3.2	This is the component that relates to WASH mostly. As suggested above it would be good to reflect this more clearly in the name of the "pathway" and brand as "Strengthen integrated water resources and water supply and sanitation services".	Sanitation and Water For All (SWA)	Thank you for your comment and well noted. We have adopted the name "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services"
3.2	1.1.1 "Pathway 2: Strengthen integrated water resources management and water management" could be replaced by Strengthen integrated water resources management and water governance", to avoid confusion with management twice and to be more aligned with the content. Then, other elements more related to infrastructure, new water sources, etc. could be included in a new different pathway- see comment below.	Stockholm International Water Institute (SIWI)	Thank you for your comment and well noted. We have adopted the name "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services"
3.2.2	Within the document, the discussion of IWRM and water management in highlighting working with local associations (user-groups) and strengthening community engagement) must more clearly specify the inclusive nature of such engagements to represent marginalized population groups in such community-centered management structures, including the requirement to give women adequate voice, vote and agency in water-related decision-making, given their gender- and care related differentiated water needs and priorities (including related to sexual and reproductive health and rights).	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, well noted. Community based included under water governance section as enabler for pathway 2
3.2	As also set by SDG target 6.5, climate change adaptation needs to be mainstreamed into existing IWRM, <b>including at transboundary level</b> . It would be great to mention it. Indeed, three out of four of the actions foreseen under the area "Preservation of existing water resources" have a transboundary aim.	UNECE	Thank you for your comment, text reworded and included as suitable.
3.2.2	One aspect that seems to be overlooked are community infrastructures. In remote areas, where water access is not secured by the State, community infrastructures are available (water towers), sometimes thanks to past projects. Water is paid for by users, the payment goes to a local fund managed by a water committee, and is used to cover maintenance costs.  There are good experiences of these practices in Sahelian countries.	UNDP	Thank you for your comment, the name of the pathway 2 changed to "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services" that's clearly emphasis the WASH and community infrastructure
3.2	Aligned with the comment above, the reference to "three sub-areas" can be the great entry point to make a clear and strong reference to WASH services.	Sanitation and Water For All (SWA)	Thank you for your comment, the name of the pathway 2 changed to "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services" that's clearly emphasis the WASH and community infrastructure
3.2	Aligned with the comment above (Line 473), the reference to "three sub-areas" can be the great entry point to make a clear and strong reference to WASH services.	UNICEF	Thank you for your comment, the name of the pathway 2 changed to "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services" that's clearly emphasis the WASH and community infrastructure

3.2	Pollution of freshwater from industries should also be taken into consideration. If not in the areas of interventions, it should come out more clearly in the baseline/risks. This is a major issue, with mining and productive industries causing immense loss of freshwater for downstream communities.	UNDP	Thank you for your comment and text reworded and added
3.2	This list should include the 'restoration of freshwater and coastal ecosystems'	Convention on Biological Diversity	Thank you for your comment
3.2	This could build on the TDAs (Transboundary Diagnostic Analysis) that are developed for a number of major basins, as supported by GEF projects. In general, activities related to transboundary basins and aquifers should be aligned with TDAs and SAPs (Strategic Action Plans).	UNDP	Thank you for your comment, well noted
3.2	We would advise to consider that involving the PS in water supply might be risky for community resilience. Having private interests into vital resources might adversely impact vulnerable people.	UNDP	All projects will be assessed against the GCF investment criteria, section 6
3.2	On top of local associations it is important to work also with <b>basin and regional organisations</b> to promote knowledge sharing. Indeed, costs and benefits of various options to manage water resources have impacts not only at local/national level but also at transboundary level.	UNECE	Thank you for your comment, well noted. Text reworded and amended as required.
3.2	engage in water conservation practices, ... mainly thinking of water conservation agricultural practices (that are not polluting, that regenerative ... for soil, biodiversity, ...	Stockholm International Water Institute (SIWI)	Thank you for your comment
3.2	Proposed narrative to be added: "New water supply and sanitation services". To avoid maladaptation, project planning decisions, project design, and construction methods for the new WASH systems to be built (and operated) need to take into account the impacts of climate change. Existing WASH systems might need to be retrofitted. To achieve that, institutional arrangements and WASH governance needs to be strengthened around climate resilience. This includes building the capacity of WASH and water resources stakeholders, developing climate risk analysis, and the climate rationale of WASH programmes. At policy level, the integration of climate and development strategies and plans is needed to help raise the ambition and to safeguard a climate vulnerable sector such as WASH. Inter-sectoral coordination needs to be strengthened with focus on health, food security and education sectors <b>NOTE: This narrative could alternatively be included under the sub-section in line 527 and rebranded as "Water and Sanitation Systems".</b>	UNICEF	Thank you for your comment, well noted. Text reworded and amended as required.
3.2	Proposed narrative to be added: "New water supply and sanitation services". To avoid maladaptation, project planning decisions, project design, and construction methods for the new WASH systems to be built (and operated) need to take into account the impacts of climate change. Existing WASH systems might need to be retrofitted. To achieve that, institutional arrangements and WASH governance needs to be strengthened around climate resilience. This includes building the capacity of WASH and water resources stakeholders, developing climate risk analysis, and the climate rationale of WASH programmes. At policy level, the integration of climate and development strategies and plans is needed to help raise the ambition and to safeguard a climate vulnerable sector such as WASH. Inter-sectoral coordination needs to be strengthened with focus on health, food security and education sectors <b>NOTE: This narrative could alternatively be included under the sub-section in line 527 and rebranded as "Water and Sanitation Systems".</b>	Sanitation and Water For All (SWA)	Thank you for your comment, well noted. Text reworded and amended as required.
3.2.2	Add under "New Water Supply Sources": "Encouraging the use of alternative water sources, such as reclaimed water, desalinated seawater, and rainwater harvesting, in accordance with local conditions."	Advisor to China Board Member	Thank you for your comment
3.2	It is concerning to read that one of the few references to community engagement is discussed (instrumentally) in relation to projects that may cause displacement. We recommend that any mention of displacement should be accompanied to international best practices and principles on rights and tenure, such as the UN guidelines on Development Induced Displacement and the UN VGGT's	Both ENDS	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6 including ESS safeguard
3.2	Is this suggesting the GCF will finance projects supporting displacements?	UNDP	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6 including ESS safeguard
3.2.2	Under its discussion of "new water supply sources", this section speaks of water projects that may cause displacement. What are the links to other GCF policies in that regard, especially for indigenous peoples? The line only speaks of strengthening community engagement, with no further details, and no mention of free, prior and informed consent (FPIC) of affected communities. More generally, when it comes to community participation and engagement, there are only a few mentions in the guide, for example, on sharing costs with communities.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6 including ESS safeguard and indigenous people

3.2	<p>As per comment above, this would make a stronger and clearer climate rationale by being branded as "Addressing climate related hazards" (the use of "mitigating" here can be misleading).</p> <p>Proposed narrative to be added:</p> <p>There are no climate resilient populations if they don't have resilient access to basic services such as water and sanitation. In relation to this, the IPCC has evaluated how patterns of risks and potential benefits are shifting due to climate change. A major conclusion is that the most effective measures to reduce vulnerability in the near term are programs that implement and improve basic public health measures such as provision of clean water and sanitation [...] and alleviate poverty.</p> <p>The provision of resilient WASH services clearly reduces vulnerability and is a strong component of adaptive capacity. Therefore, the overlap of lack of access to WASH services with high exposure to climate hazards needs to be prioritized, especially in the least developed countries and rural exposed areas (those that have contributed least to climate change). For example, the overlap of lack of access to water supply and drought on one hand, and the overlap of lack of sanitation and floods on the other are clear examples of a strong climate rationale at the interface of sustainable development and climate action.</p> <p><b>NOTE: This narrative could alternatively be included under the sub-section in line 539 and this is rebranded as "Building community resilience and adaptive capacity".</b></p>	UNICEF	<p>Thank you for your comment, the name of the pathway 2 changed to "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services" that's clearly emphasis the WASH and community infrastructure. Also the WAs and sanitation services discussed in many places where make this text surplus.</p>
3.2	<p>As per comment above, this would make a stronger and clearer climate rationale by being branded as "Addressing climate related hazards" (the use of "mitigating" here can be misleading).</p> <p>Proposed narrative to be added:</p> <p>There are no climate resilient populations if they don't have resilient access to basic services such as water and sanitation. In relation to this, the IPCC has evaluated how patterns of risks and potential benefits are shifting due to climate change. A major conclusion is that the most effective measures to reduce vulnerability in the near term are programs that implement and improve basic public health measures such as provision of clean water and sanitation [...] and alleviate poverty.</p> <p>The provision of resilient WASH services clearly reduces vulnerability and is a strong component of adaptive capacity. Therefore, the overlap of lack of access to WASH services with high exposure to climate hazards needs to be prioritized, especially in the least developed countries and rural exposed areas (those that have contributed least to climate change). For example, the overlap of lack of access to water supply and drought on one hand, and the overlap of lack of sanitation and floods on the other are clear examples of a strong climate rationale at the interface of sustainable development and climate action.</p> <p><b>NOTE: This narrative could alternatively be included under the sub-section in line 539 and this is rebranded as "Building community resilience and adaptive capacity".</b></p>	Sanitation and Water For All (SWA)	<p>Thank you for your comment, the name of the pathway 2 changed to "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services" that's clearly emphasis the WASH and community infrastructure. Also the WAs and sanitation services discussed in many places where make this text surplus.</p>
3.2	<p>Also in this case it would be important that the understanding of relevant water hazards and risks is mainstreamed not only in national adaptation plans but also in <b>adaptation plans at basin level</b>. Indeed, climate change does not know borders.</p>	UNECE	<p>Thank you for your comment, well noted</p>
3.2.2	<p>The focus should not be on green versus grey, but on a systematic inclusion of natural infrastructure (ecosystems, the approaches in sponge cities, restoring or constructing wetlands) within the set of activities proposed for dealing with water related hazards. There are enough studies showing the potential benefits of these approaches, though insufficient in developing countries.</p> <p>There are already coastal hazard reduction projects funded by the GCF – why the reference to "piloting"?</p>	UNDP	<p>Thank you for your comment and agreed. text added to reflect on the GCF's initiative that aims to pilot and implement a well-managed mix and integration of the Grey-Green Infrastructure to enhance the adaptability and resilience of coastal and upstream communities to climate change (Drought and Flooding) and mitigate energy-intensive grey infrastructure including increasing storage of carbon through promoting, designing and financing resilient grey-natural water infrastructure projects that demonstrated improvements to water and climate risk resilience</p>
3.2	<p>FAO suggests further emphasising the importance of strong Water Governance and Institutional Frameworks. The benefits of any technical water-use efficiency gains can only be distributed equitably and sustainably with strong institutional purpose and means. For instance: in terms of operational costs, energy efficiencies gained in pumping water with modern pumps may encourage more pumping. Solar groundwater pumping may be very energy efficient and have very low marginal costs. However, the technology can still result in higher levels of withdrawal and higher levels of evaporative consumption.</p>	Food and Agricultural Organization of the United Nations (FAO)	<p>Thank you for your comment and a dedicated section for water governance and institutional structure as enabler for pathway 2.</p>
3.2	<p>the "quality" of governance is one of the key limitations ...</p>	Stockholm International Water Institute (SIWI)	<p>Thank you for your comment and agreed. The guide now indicating Governance is one of the key limitations to implementing IWRM, including coordination issues among institutions at the scale, weak institutional capacity, and insufficient funding. As such, large-scale adoption of sustainable and resilient water management practices requires both transformative policy and governance approaches</p>

3.2	Coordination issues for implementation of IWRM exists also among <b>countries</b> , not only among institutions of the same country.	UNECE	Thank you for your comment and agreed. The guide now indicating Governance is one of the key limitations to implementing IWRM, including coordination issues among institutions at the scale, weak institutional capacity, and insufficient funding. As such, large-scale adoption of sustainable and resilient water management practices requires both transformative policy and governance approaches
3.2	inclusive and "accountable" stakeholder process	Stockholm International Water Institute (SIWI)	Thank you for your comment and text included
3.2	An additional key factor is the need to hold decision-maker to account. Accountability mechanisms are to be strengthened. Strengthening accountability at different levels of governance and between different type of partner (civil society, public and private) will build trust and partnerships. Building accountability builds trust and builds creditworthiness	Stockholm International Water Institute (SIWI)	Thank you for your comment and text included
3.2	"good governance" is indeed built with more transparency .... but not only of data ... Maybe include also "more transparency in participative decision-making processes".	Stockholm International Water Institute (SIWI)	Thank you for your comment and well noted with transparency and accountability. Text amended to reflect accountability and transparency.
3.2	But what is really the paradigm shift in the governance model? The water community has been advocating IWRM for decades. What's new here? Also, suggest referencing the World Bank's EPIC Response framework where we attempt to go deeper into innovative governance for flood and drought risk management. <a href="https://www.worldbank.org/en/topic/water/publication/an-epic-response-innovative-governance-for-flood-and-drought-risk-management">https://www.worldbank.org/en/topic/water/publication/an-epic-response-innovative-governance-for-flood-and-drought-risk-management</a>	World Bank	Thank you for your comment and well noted with transparency and accountability. Text amended to reflect accountability and transparency.
3.2	It is not clear what you mean with "governance and management policies <i>must be localised</i> ". Please consider a different formulation.	UNECE	Thank you for your comment and well noted . Text amended .
3.2	Also, in this section, there is no discussion on what is necessary to ensure "appropriate tariffs and fees support an equitable water distribution" and no acknowledgement of how this might be compounded by and contradicted by the notion of full-cost recovery for water services delivery.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, cost and tariff discussed in the other locations in the document.
3.2	Again, this is missing key points. How exactly can this infrastructure be "climate proofed"? Some reference should be made to employing new approaches to infrastructure planning and design - we have done this at the World Bank through various publications on decision making under uncertainty, which we are happy to share if interested.	World Bank	Thank you for your comment and appreciate the point made. Infrastructure discussed in many places where new text added to also reflect on the new GCF initiative that aims to pilot and implement a well-managed mix and integration of the Grey-Green Infrastructure to enhance the adaptability and resilience of coastal and upstream communities to climate change (Drought and Flooding) and mitigate energy-intensive grey infrastructure including increasing storage of carbon through promoting, designing and financing resilient grey-natural water infrastructure projects that demonstrated improvements to water and climate risk resilience
3.2.2	Suggestion: underline local knowledge, knowledge co-production among different actors to foster innovation and locally/nationally appropriate management systems.	GIZ	Thank you for your comment
3.2.2	Water-related hazards should also include potential for increases in or expansion of areas impacted by water-borne diseases.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment and text amended
3.2.2	This line speaks of the need to increase acceptance and use of non-traditional financing mechanisms, as a means to deal with water-related hazards. Can the GCF explain what kind of non-traditional financing mechanisms are included in here and why their use and acceptance is needed in this case? How does the GCF intend to define what mechanisms are needed and appropriate and to ensure that these decisions are taken in consultation with the affected people and communities and are not taken by AEs and the GCF alone?	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, GCF financing instruments are discussed in the related section 4.
3.3	What is missing in this section is a recognition of competing interests as a threat to inclusive and sustainable water management, and the need for responsive and inclusive governance arrangements to mediate between them.	Both ENDS	Thank you for your comment, text amended to reflect on inclusive governance

3.3	<p>New pathway could be created, following the comment about 2.3. Resilient water supply and sanitation". Some suggested bullet points could be:</p> <ul style="list-style-type: none"> <li>• Ensuring that WASH infrastructure, services and behaviours are sustainable, safe and resilient to climate related risks.</li> <li>• Fostering sustainable use, protection and management of surface and groundwater resources, and resilient waste management.</li> <li>• Ensuring that resilient WASH programmes contribute to build community resilience to adapt to the impacts of climate change. (eg. Through the water-food-energy nexus).</li> <li>• Working towards a low-carbon WASH sector by: <ul style="list-style-type: none"> <li>o Improving water efficiency</li> <li>o Ensuring, where possible, the use of renewable energy</li> <li>o Increasing energy efficiency of water and sanitation operations to lower Green House Gases (GHGs) emissions</li> <li>o Recovering energy from waste.</li> </ul> </li> <li>• Capacity development, behavioural change and governance at community and local level.</li> </ul>	Stockholm International Water Institute (SIWI)	Thank you for your comment and well noted. We have changed the name of Pathway 2 to "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services". Also, note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
3.3	<p>Elements related to the potential for sanitation to contribute to mitigation seems to be not well covered -see some elements here: <a href="https://doi.org/10.1038/s41545-020-0072-8">https://doi.org/10.1038/s41545-020-0072-8</a>. In making progress towards SDG targets 6.2 and 6.3, there is significant potential to reduce emissions from sanitation and wastewater systems through recovery of energy and nutrients contained in waste, while also providing indirect reduction of emissions through renewable energy production and reduced dependency on fossil-based chemical fertilisers. In addition, energy recovery from wastewater systems could provide over 55% of the electricity required for municipal wastewater treatment by 2040, demonstrating the dual benefits of reducing waste-related emissions and producing renewable energy. Rather than focus on additionality that privileges certain hard interventions, a greater focus should be placed on identifying the most efficient, effective and equitable adaptation measures within the sanitation sector, thus identifying measures with the lowest possible costs, most effective in reducing negative climate impacts, and that reach the most vulnerable populations and countries.</p>	Stockholm International Water Institute (SIWI)	Thank you for your comment and well noted. We have changed the name of Pathway 2 to "Strengthen integrated water resources management - protection from water-related disasters, preserve water resources and enhanced resilient water supply and sanitation services". Also, note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate.
3.3	<p>The headline does not match with the bullet points below. It's rather "Key actions to overcome barriers/Overcoming barriers to paradigm shifting pathways"</p>	GIZ	Thank you for your comment and well noted. Heading amended
3.3	<p>Collaboration is identified as a key aspect (§3.3) but it is not clear how the GCF is positioned in relation to other actors in the water sector. <i>Who will be the privileged partners for projects?</i></p>	State Secretariat for Economic Affairs SECO Development cooperation, Infrastructure Financing	Thank you for your comment, The GCF is working directly with AE, DAE and NDA in terms of project and NAP and country program development. However, AE, DAE and NDA are collaborating with all key actors that essential to project delivery and implementation
3.3	<p>We suggest to include the importance of collaboration also <b>among countries</b>.</p>	UNECE	Thank you for your comment. Agreed, and now it is indicated in the guide "water sector actors can collaborate within their organisations, with other organisations, and with partners outside of the water sector at the scale (water sector is the connector between many sectors i.e food, energy, ecosystem, etc)."
3.3	<p>As mentioned before, experience with development cooperation and climate finance demonstrates that solutions should very often not be high-tech in order to fit to local needs. For example, a good way of adapting in flood-prone areas is keeping ducks instead of chicken. Good adaptation to deal with drought can be sand dams or climate-smart agricultural practices in those countries where a majority still works in the agricultural sector.</p>	Germany BMZ	Thank you for your comment and agreed. All projects will be assessed against the GCF investment criteria, section 6
3.3	<p>In line with the comment above, innovative 'regulatory frameworks' should also address principles of participatory water management and inclusive governance and outlines in the SDGs.</p>	Both ENDS	Thank you for your comment and text amended
3.3	<p>The paragraph can be interpreted as putting forward a bit too much innovation or reliance on innovative technologies. What is needed is adequate regulatory frameworks, not necessarily "innovative" ones, or regulatory frameworks fostering the adoption of new technologies.</p>	UK FCDO	Thank you for your comment. Text changes to clarify it is adequately regulatory framework to encourage innovation for the benefit of customers, the environment, and broader society including inclusive governance arrangements
3.3	<p>Please include regulatory frameworks required for integration of nature based solutions in the water sector as integral to IWRM.</p>	UNDP	Thank you for your comment and agreed. Text added "Developing regulatory framework and policy for integration of EBM in the water sector as integral to IWRM that can serve the adequately mix and integration of the grey-green resilient infrastructure"

3.3	"Customers" should be replaced by "rights-holders" or, at the very least, rights-holders should be added to this list. As this sector guide acknowledges, water is a human right and it therefore should be discussed that way throughout. Rights-holders should be referenced as such and should not be referenced as "customers" because doing so assumes and implies that privatization of water is the right approach. Additionally, the text also should differentiate properly between commercial uses, in which a focus on customers might be considered appropriate, and household ones.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment
3.3	Also in this case it would be important to that reconciliation of inconsistent regulations happen also <b>among countries</b> .	UNECE	Thank you for your comment, this is now indicating "water sector actors can collaborate within their organisations, with other organisations, and with partners outside of the water sector at the scale (water sector is the connector between many sectors i.e food, energy, ecosystem, etc)."
3.3	maybe also "governance standards", to improve the "quality of governance"	Stockholm International Water Institute (SIWI)	Thank you for your comment, please see the dedicated water governance section
3.3	The discussion of water markets is naively optimistic and overlooks the evidence demonstrating that markets can also drive inequality and threaten human rights (to water). Therefore we strongly recommend including this consideration, and the potential threat of water markets, in this section.	Both ENDS	Thank you for your comment. There are many successful cases using market based or market system development approach that avoid direct subsidy and improve the uptake of water efficiency technologies
	The focus in discussions about "innovative regulatory frameworks" on "creating markets and competition in the water sector that encourages innovation through <b>water trading</b> [emphasis added], greater third-party involvement in large projects, and markets for ecosystem services" is very concerning. This sentence is loaded with neoliberal buzzwords with the presumption of a privatization of the water sector. It raises a number of concerning questions: Why should the GCF have a role in water trading? What third parties are we talking about? And a focus of ecosystem services is not equivalent to, nor should it be equated with a (carbon) market creation. Instead, the statement should be replaced with: "...creating social safety-nets as part of regulatory frameworks, when innovation is seen primarily in terms of markets and competition, encouraging problematic solutions such as water trading, greater third-party involvement in large projects, and markets for ecosystem services, so as to ensure basic human right to water is not violated."	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, text amended "Creating markets and competition in the water sector that encourages innovation through virtual water and/or water trading, greater third-party involvement in large projects, and markets for ecosystem services considering the local and social context."
3.3	What does water trading entail? Since water is a public good, what is the impact of water trading on the poor and vulnerable communities, women and IPs? Is water trading understood in the traditional sense of a water user selling his or her right to sell water, such as referenced here: <a href="https://www.iatp.org/sites/default/files/2013_03_27_WaterTrading_SV_0.pdf">https://www.iatp.org/sites/default/files/2013_03_27_WaterTrading_SV_0.pdf</a> )? Or is it understood in the sense of derivatives water trading? If the latter, the GCF Observer Network is opposing the inclusion of this language.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, text amended "Creating markets and competition in the water sector that encourages innovation through virtual water and/or water trading, greater third-party involvement in large projects, and markets for ecosystem services considering the local and social context."
3.4	Enablers to achieving paradigm shift paradigm could be aligned with the enablers highlighted at the recently approved Integrated Results Management Framework, at B29, i.e. Institutional and regulatory, technical, market, and knowledge. Topics also associated to the section 3.3 above	GIZ	Thank you for your comment
3.4	Very little is said about the role of the community in enabling successful water interventions	UNDP	Thank you for your comment. Now included broader society including inclusive governance arrangements.
3.4	We appreciate that this list of "Enablers to achieving paradigm shifting pathways" recognizes that measuring success, what is technically available, etc. need to be culturally and locally specific. It should also be made clear that local context and the traditional knowledge of Indigenous Peoples and local communities should be considered and consulted in the development of solutions and technologies. For example by adding to the list "Embrace the role of considering the local context and incorporating traditional knowledge of Indigenous Peoples and local communities". The water sector in each location may be very different and so a one-size fits all approach should not be used. Additionally, in developing projects and programs related to the water sector, the GCF and its partners should look to traditional knowledge of Indigenous Peoples and local communities.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6 including ESS safeguard and indigenous people
3.4	Again, no mention of nature based solutions or the support needed for decision makers to include these.	UNDP	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6. There is a dedicated section for EBM
3.4	In addition to scientific evidence, it is important to recognize, acknowledge and not overlook the practices of indigenous peoples and local communities in their efforts to sustainably use water resources.	Convention on Biological Diversity	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6 including ESS safeguard and indigenous people
3.4	Reference to TDA could be relevant here	UNDP	Thank you for your comment
3.4	The paragraph can be interpreted as putting forward a bit too much innovation or reliance on innovative technologies. What is needed is adequate regulatory frameworks, not necessarily "innovative" ones, or regulatory frameworks fostering the adoption of new technologies.	UK FCDO	Thank you for your comment and this is now clarified in the text

3.4	It would be good to explain (or re-phrase) what traditional application of development assistance programmes mean....traditional may have different connotations.	GIZ	Thank you for your comment, the text change to reflect the past and current application of development assistance programmes
3.4	How has concessional finance reinforced the dependence on outside technical and financial support? Where is the evidence for this? Additionally, lines 607 and 608 seem to partly contradict this by stating that: "technical assistance grants can build the capacity of water service delivery providers to better meet the changing demands associated with climate change."	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, noted and text reworded to remove this contradiction
3.4	This section contains a welcome recognition of contextual and cultural difference and its implications for measuring success. As with the issue of rights and inclusive governance, we find that this issue is deserving more recognition throughout the entire text.	Both ENDS	Thank you for your comment
3.4	Innovation and technologies in water management, e.g. using remote sensing and GIS in agricultural water management can help to scale up with impacts. It is suggested that the Guide prioritize investment in such areas.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, this is captured in other section in the document.
3.4	The reference to the need for social and political change is welcome, but the notion that private sector should drive this change is odd and betrays a concerning perspective on development, citizenship and the state.	Both ENDS	Thank you for your comment, the guide indicate financing to expand to a scale needed to create an impact that will shift social and political thinking toward inclusive and climate resilient water-secure futures. Caution must be taken however that in programme design, the nuance of each group is not lost as these details determine sustained success.
3.4	This is the only reference to inclusive futures. As stated above, we suggest placing much more emphasis on this topic throughout the entire text	Both ENDS	Thank you for your comment, this is added in many places in the guide now
3.4	Ecosystem-based approaches and other synergistic nature-based solutions that include biodiversity safeguards should be prioritized over quick-fix solutions for their co-benefits toward other sustainable development issues.	Convention on Biological Diversity	Thank you for your comment, noted. EBA has defined under pathway 2 including community participation and has its own dedication section to emphasize its importance as part of the solutions. Please also note, All projects will be assessed against the GCF investment criteria, section 6
3.5	Including ecosystem based adaptation approaches that have community participation as integral elements.	UNDP	Thank you for your comment, noted. EBA has defined under pathway 2 and has its own dedication section to emphasize its importance as part of the solutions. Please also note, All projects will be assessed against the GCF investment criteria, section 6
3.5	Again no mention of the role of the community	UNDP	Thank you for your comment. The last pronged: "coalition of knowledge" to scale up success to replicate successful projects and programmes and benefit from lessons learned including inclusive role of the community. Please also note, All projects will be assessed against the GCF investment criteria, section 6
3.5	This is insufficient to shift the paradigm on sustainable and climate resilient water access and water resources for all.	UNDP	Thank you for your comment
3.5	We consider that GCF support, on top of developing countries, should support also <b>basin / regional organisations</b> to create and strengthen integrated climate development policies.	UNECE	Thank you for your comment agreed this is evident in the pathway 2 and also from the projects that approved and supported by GCF. Scale is matter to the solution based on the problem.
3.5	Proposed to explicitly mention also sanitation	UNICEF	Thank you for your comment, the title of pathway two changed to include "enhanced resilient water supply and sanitation services"
3.5	Proposed to explicitly mention also sanitation	Sanitation and Water For All (SWA)	Thank you for your comment, the title of pathway two changed to include "enhanced resilient water supply and sanitation services"

3.5	The reference to "piloting new asset classes in sanitation and water re-use as a way to catalyse climate innovation in this section should be stricken. It is not the role of the GCF as part of the financial mechanism of the UNFCCC with the focus on providing concessional finance to developing countries to engage in creating or promoting new asset classes for water security.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. The initiative aims to treat water as "a new asset class" for water reuse and sanitation, using credit enhancement towards developing debt capital market and acceptable financial returns but remain in line with ESG impacts and the Paris Agreement and contribute to UN SDGs that will allow municipalities and private sector to scale up water reuse projects and/or governments purchase a service instead of an asset. Text amended to simply clarify the initiative.
3.5	Please make sure to incorporate the comments made in the executive summary to this table.	KfW	Thank you for your comment
3.5	Regular assessment of water infrastructure efficiency and state ; water infrastructure retrofit	Germany BMZ	Thank you for your comment and agreed. This is aligned with GCF's initiative and text reworded and added.
3.5	How about other non data-driven innovation? infrastructure and retrofit innovation e.g. leak detection technologies, repair methodologies	Germany BMZ	Thank you for your comment, agreed and this is included in the body of the guide. All projects will be assessed against the GCF investment criteria, section 6
3.5	add PES?	Germany BMZ	Thank you for your comment
3.5	Minimising water demand should also be part of water security > water efficiency in industries > dry farming and water-efficient irrigation > shifts in dietary consumption patterns > shifts in water pricing (moving away from decreasing block tariffs structure)  (reflecting lines 388-400)	Germany BMZ	Thank you for your comment, this is captured under its related sections
3.5	We find it very problematic that private sector engagement in the water sector is caveated with "by supporting full cost recovery through direct and indirect charges". It is not the task of GCF (concessional) finance support to enable full cost recovery of the private sector. The overview table does not include any acknowledgement of or reference to the negative impacts on water service provision and for affected people and communities related to full cost-recovery in terms of accessibility and affordability of water service and its provision as a public good. Related to this ,enabling private sector participation by supporting full cost recovery, especially when trying to introduce new, and potentially expensive technologies, could result in negative impacts on access to services for people with low incomes, thus threatening their human rights to water and sanitation.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, the table only provide summary but the key substances in the body of the guide. Please see above comments in relation to similar comment on cost recovery
3.5	Reference "supporting carbon credit initiatives" under MFS is misguided and its role/reason for inclusion here unclear; the focus of "water security" is on adaptation; any carbon credit can at best be a co-benefit, but not a primary focus and intent. Instead, before speaking about or introducing carbon market, it is important to critically examine the "sectors of mitigation projects that could negatively impact water security".	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH
3.5	We find it very problematic to make household level resilient water systems the responsibility of individual households (including in taking up loans) not part of public sector service provision.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects will be assessed against the GCF investment criteria, section 6
3.5	Under possible actions for the two pathways for water security, under "Mobilising finance at scale" (MFS) for each of the two possible pathways two actions are proposed that we have serious concerns about. We therefore oppose the inclusion of proposed actions... 1) Under "Enhancing water conservation, water efficiency, and water re-use" one of the recommendations under MFS is to "Enable private sector participation by supporting full cost recovery through direct and indirect charges" 2) Under "Strengthening integrated water resources management and water management" one of the recommendations under MFS is to "Expand micro-finance to support household level resilient water systems" The two recommended actions have serious implications for the poor and vulnerable communities, in particular Indigenous Peoples and women headed households. This gives the impression that apart from paying water bills, households will have to pay out-of-pocket extra charges (i.e., direct/indirect charges so that private sector could recoup its investment, and having to get a loan in the form of micro-finance). If households could not afford to pay, would they forfeit their ability to access clean water, which is a public good with the rights to water and sanitation fundamental human rights? Therefore, the GCF should prioritise funding water security projects/programs where the climate benefits and the socio-economic benefits are judged to be more relevant than the financial return of investors.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people

3.5	While “integrate social and gender-sensitive dimensions of water security interventions” are mentioned for one of the two pathways (and why not also as relevant to the other?), this is not further expanded upon and nor applied and described in the draft guide.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people
3.5	What is meant by micro-finance for household level resilient water systems. Does this mean the GCF might consider financing projects that are based on households, potentially even low-income, vulnerable households, directly paying for their own water systems’ upgrades? If so, the GCF Observer Network strongly rejects such an interpretation and focus.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people
3.5	We welcome the inclusion of “ecosystem-based management” (EbM) as one of the approaches to achieve paradigm shift in water security as well as integrating EbM for Integrated Water Resource Management. However, there is no mention of “community-based water management” and “locally-led adaptation” in this document. This best practice should be included in Pathway 2 as the document highlights the importance of empowering and building the capacity of local communities, IPs and women in water security. Respective references should be added to Figure 3 (page 25, line 665), by including a new bullet point in column: “Transformational planning and programming” for the paradigm-shifting pathway on “Strengthening integrated water resources management and water management” to read: “Improve community-based water management using locally led adaptation in IWRM for water security interventions at the local level. ”	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, community participation management and inclusion added and reflect where suitable in the guide. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation.
4. Financing paradigm shifting pathways	On p.26, in the opening paragraph, the guide identifies that there is a lack of funding flowing from the private sector to water sector projects in most low income and low middle-income countries. Whilst the chapter does note the importance of finding innovative funding mechanisms to address this gap, as mentioned above, by focusing on the role of the private sector, the guide is leaving behind countries that are not stable since the business case for financing water security interventions and associated water security-related financing risks probably only applies to stable countries.	International Committee of the Red Cross (ICRC)	Thank you for your comment, community participation management and inclusion added and reflect where suitable in the guide. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation.
4.1	Regarding the suggestions to privatize the water supply, how can we ensure most vulnerable communities won't be adversely impacted?	UNDP	Thank you for your comment, community participation management and inclusion added and reflect where suitable in the guide. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation.
4.1	The business case for financing water security interventions should explicitly acknowledge that “The benefits from strategic investment in water security” is not only financial, but also social. The financial benefits from investments in water security will also come from the fact that water security will reduce the risks of conflict (i.e. wars or other armed conflicts exacerbated or caused by lack of access to water) and so ensuring the right to water has a financial co-benefit.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, community participation management and inclusion added and reflect where suitable in the guide. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation.
4.1	This statement gives the impression that the guide is more interested in promoting private sector profits and participation than water security. There seems to be an assumption throughout this guide that private sector engagement is the only or best way to promote water security in developing countries, without any proper assessment of the impacts of this on the accessibility for all households. The 2020 report on water privatization of the Special Rapporteur on the Human Rights to Water and Sanitation backs up these concerns. See: <a href="https://www.ohchr.org/Documents/Issues/Water/10anniversary/Privatization_EN.pdf">https://www.ohchr.org/Documents/Issues/Water/10anniversary/Privatization_EN.pdf</a>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they generate, including social benefits
4. Financing paradigm shifting pathways	First, thanks for having a transparent consultation process. Great to be able to input into such an important and growing component for financing/funding the sector. Overall it is a solid document so congratulations to the team. My comment - fully support the financing approach and the need to integrate private sector investment is clear. It is great to see your flexibility in the types of financial instruments that can be used to encourage investment. Based on past experiences though, a key bottleneck for successful financing initiatives is having investment quality projects developed for investment pitching. Will developing such dossiers be able to be financed by GCF? I would recommend it. Also, suggest to add this to your risk matrix.	UNICEF	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people

4.1	What happens if there is demand but not enough to recoup costs? The guide focuses so much on the private sector that it makes it hard to see what role the public sector can play. To really serve as guidance, it would be more appropriate to state more clearly when the GCF might consider a public sector project to be appropriate and when it would be acceptable to have the private sector participate.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people
4.1	The whole table is geared towards the private sector: for example expropriation is only addressed in the context of the government expropriating a private sector project and not on communities being expropriated for the purpose of the project. Why does the GCF consider that guidance on public sector and concessional finance is not needed? Does it purposefully exclude a focus on public sector provision with GCF concessionality?	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people
4.1	The table reads more like a "check-lists" for IFIs financing water infrastructure projects, not for a broader engagement on water related services and management (biased and narrow understanding of the activities in this sector); it contains a number of problematic assumptions: 1) a focus on the "willingness" to pay over the "ability" and affordability to pay (with respect to tariff affordability (see for example the 2020 report of the Special Rapporteur on the Human Rights to Water and Sanitation on tariffs and affordability, available at: <a href="https://www.ohchr.org/Documents/Issues/Water/10anniversary/Affordability_EN.pdf">https://www.ohchr.org/Documents/Issues/Water/10anniversary/Affordability_EN.pdf</a> ); 2) an engagement bias towards involvement of IFIs; 3) reference to "land value capture" as enhancement for commercial visibility – what does this mean for safeguarding and protecting communal and/or indigenous lands without formal land titling?; and 4) a reference to land being provided free and clear by local governments – would this be for PPPs or private sector engagements?	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people
4.1	There are many people who are not accessing water through the piped system/formal network. These people often rely on more expensive water even though they are amongst the most vulnerable and least able to pay premium to buy from private providers. One option is to also incentivise mechanisms to improve regulation and access to these providers, and to set a fair price.  Often those on the formal network will pay lower than those in informal settings.	UNDP	Thank you for your comment
4.1	While it is correct that this risk needs to be managed, it is risky to propose that this be managed by the party that can manage this risk more effectively as water is seen as a basic human right and not as a commodity. As such, there is concrete risk of most vulnerable populations being harmed by WTP assessments and tariffs designed based on it.	UNDP	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people
4.2	Proposed: Water and sanitation utilities, and rural dispersed (off-grid) populations, have distinct needs.....	UNICEF	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people

4.2	Proposed: Water and sanitation utilities, and rural dispersed (off-grid) populations, have distinct needs.....	Sanitation and Water For All (SWA)	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people
4.2	This paragraph emphasizes the importance of the private finance in “water security in particular” given the “pressure on public sector finance to meet the climate targets under UN-SDG6.” However, the pressure on the public sector could be alleviated not only the private sector being involved in water security, which could have negative ramifications on the right to water especially if it leads to increased privatization and costs (also demonstrated by treating rights-holders as “customers” or “users”), but also by supporting recipient country governments directly with finance (especially at the highest levels of concessionality and including grants) to provide critical access to water. This could also be achieved by expanding country’s fiscal space, for example by reducing debt burdens through debt cancellation or debt-for-climate/development swaps.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. Given the pressure on public sector finance to meet the climate actions targets under UN-SDG6, it is critical to attract private, institutional, and commercial financiers together with IFIs, including the GCF in climate finance in general and water security in particular. Also note, one of the financial instrument that GCF provide is grant, that provides Technical assistance for project development and capacity building to supplement loans and Grant can be approved on a reimbursable basis. All projects will be assessed against the GCF investment criteria, section 6
4.2	Investments in water supply are also capital intensive.	KfW	Thank you for your comment, yes and this is highlighted under the barrier to finance
4.2	Within the discussion on GCF financial instruments, there is only a limited discourse on grant provision; specifically, there is no mention of grant financing in support of public goods provision, including as full-cost grant. Grants are only mentioned with respect to technical assistance and as “reimbursable grants”. This is a deliberate and unacceptable deliberate narrowing of the use of grants within the water sector for public engagement purposes.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. Given the pressure on public sector finance to meet the climate actions targets under UN-SDG6, it is critical to attract private, institutional, and commercial financiers together with IFIs, including the GCF in climate finance in general and water security in particular. Also note, one of the financial instrument that GCF provide is grant, that provides Technical assistance for project development and capacity building to supplement loans and Grant can be approved on a reimbursable basis. All projects will be assessed against the GCF investment criteria, section 6
4.2	In the case of LDCs, grants should also be an opportunity to finance investments that would not be funded otherwise (no expected returns or not sufficient and no public budget)	UNDP	Thank you for your comment. Given the pressure on public sector finance to meet the climate actions targets under UN-SDG6, it is critical to attract private, institutional, and commercial financiers together with IFIs, including the GCF in climate finance in general and water security in particular. Also note, one of the financial instrument that GCF provide is grant, that provides Technical assistance for project development and capacity building to supplement loans and Grant can be approved on a reimbursable basis. All projects will be assessed against the GCF investment criteria, section 6

4.2	This is all fairly theoretical and difficult to apply in sub-Saharan Africa contexts. PPPs have proved complex to put together with often Govt being cheated by more capacitated partners. The ground reality is that in many rural communities water cannot be bought, so the private sector case is weak. Can GCF come up with more realistic small scale options too?	UNDP	Thank you for your comment. One of the GCF initiative aims to treat water as "a new asset class" for water reuse and sanitation, using credit enhancement towards developing debt capital market and acceptable financial returns but remain in line with ESG impacts and the Paris Agreement and contribute to UN SDGs that will allows municipalities and private sector to scale up water reuse projects and/or governments purchase a service instead of an asset. GCF is in a position to (i) support countries develop, adapt policies and legislation to creates an enabling investment environment to identify, design, and implement public and private funded transformational water security interventions as a new asset class (ii) finance the transition and de-risk private investment in address financial market barriers and ensure affordability and bankability to unlock water reuse investment,(iii) New financial model accompanied with acceptable revenue in line with Paris agreement targets and SDGs
4.2	Reading this sub-section begs again the question, at its core is this document directed at projects that are supporting utilities through financing? If so, it should be made clearer throughout that this is indeed the primary beneficiary audience of this document. Otherwise, it gets confusing as to which sub-sector is really targeted here.	World Bank	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6
4.2	Instead of large sums of money, many smaller sums also bring about scale. Existing national and regional small grants funds have prove to effectively reach those at the forefront of protecting and sustainably managing water resources, notably women and women-led community based organisations. See Putting people first: the transformational impact of small grants funds (2019) <a href="https://www.bothends.org/nl/Actueel/Publicaties/Putting-people-first-the-transformational-impact-of-small-grants-funds/">https://www.bothends.org/nl/Actueel/Publicaties/Putting-people-first-the-transformational-impact-of-small-grants-funds/</a> and <a href="https://gaggaalliance.org/our-partners/">https://gaggaalliance.org/our-partners/</a> This should also be added in Figure ES-1 page 9	Both ENDS	Thank you for your comment. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation, including WASH. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people. Given the pressure on public sector finance to meet the climate actions targets under UN-SDG6, it is critical to attract private, institutional, and commercial financiers together with IFIs, including the GCF in climate finance in general and water security in particular. Also note, one of the financial instrument that GCF provide is grant, that provides Technical assistance for project development and capacity building to supplement loans and Grant can be approved on a reimbursable basis. All projects will be assessed against the GCF investment criteria, section 6
4.2	As with the above-mentioned discussion on digital technologies and markets, the discussion of PPP's is naively optimistic and one-sided, which overlooks the growing body of evidence pointing to the high transactions costs and threat to human rights (to water) associated with PPPs. We recommend a much more nuanced discussion of PPPs, which recognizes contextual factors and potential drawbacks.	Both ENDS	Thank you for your comment, one section dedicated for PPP as a financial instrument plus many others. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people.

4.2	<p>PPPs: It is suggested that PPP transactions be tailor-made / context-specific to better satisfy the 3 parties ((i) users: reliable, well-performing, and affordable services, (ii) Public objectives: Obtain funding, improve O&amp;M services, guarantee maintenance of public assets, eliminate O&amp;M subsidies, alleviate and optimize the use and allocation of public funds, etc, and (iii) Private objectives: get economic return on private funds invested and, assure long / fixed term working arrangement.</p> <p>We also kindly wish to note that irrigation is a very sensitive sub-sector for PPP. Often where project revenues do not cover the full cost of an O&amp;M system, a PPP will be equally unsustainable. In addition, users may be resistant to paying the full cost of irrigated water. In this sense, PPP often fits better with new development than already existing schemes, and concession models are more appropriate with modern schemes (huge investments, need of private know-how) and for entrepreneurial farmers with the willingness and capacity to pay for efficient I&amp;D services.</p>	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, one section dedicated for PPP as a financial instrument plus many others. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people.
4.2	<p>With respect to public private partnerships (PPPs) as adequate financial instruments , the discourse in this paragraph is completely one-sided and their suitability for water security is presented in a biased way as "well suited" without mentioning significant downsides of PPPs with respect to contractual transparency, long-term fiscal burden for the governments with public sector/the host country liability). There are many experiences, bad practice examples of many bad PPPs in the water sector/privatization of water services (including with the World Bank which is referenced here).</p>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, one section dedicated for PPP as a financial instrument plus many others. please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people.
4.2	<p>With respect to green/water bonds as adequate financial instruments, it is very worrisome that their suitability for water security finance is justified in this paragraph with "for investors, water bonds can achieve attractive risk-adjusted returns along with climate benefits and environmental co-benefits, in addition to satisfying green investment mandates, <b>without the need for time-consuming due diligence</b>" [emphasis added]. What kind of due diligence is referred to here? Financial due diligence? Environmental and social due diligence? Diligence related to corruption? The way it is describes here seems to imply "cutting corners".</p>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people.
4.2	<p>This is not correct. DRF is not just sovereign bonds and insurance - it can also be public finance for disaster funds, contingent lines of credit, and other mechanisms. WB has done a lot on DRF in relation to hydroclimatic risks and we'd be happy to share some documents if useful.</p>	World Bank	Thank you for your comment and agreed. Text reorded and corrected.
4.3	<p>Furthermore, we would encourage to look at the water sector portfolio (4.3 pg.30-31) to analyze if related water security investments are reaching those that need it most and possibly illustrating our above-mentioned points. That is to say analyzing the number of FCV countries that have received financing and the amounts received be it through international, regional or national AEs. While we recognize that GCF priority countries are LDC, SIDS and Africa we think this is an important exercise that would speak to countries that thus far are yet to be also recognized as the most vulnerable to climate change.</p>	International Committee of the Red Cross (ICRC)	Thank you for your comment
4.3	<p>It is unclear what the "respectively" corresponds to- adaptation and mitigation?</p>	UNDP	Thank you for your comment and text changed
4.3	<p>These statistics are important to keep in mind: so far there is only grant finance projects, mostly in adaptation, by public sector AEs. This reality should temper the ambitions to mobilise finance at scale a bit.</p>	Germany BMZ	Thank you for your comment
4.3	<p>This underlines the importance of not focusing too much on high-tech solutions</p>	Germany BMZ	Thank you for your comment
4.3	<p>Does this exclude those countries that lie below this threshold?</p>	GIZ	Thank you for your comment. Water stressed is based on the scale that could be country, district, region, etc. All projects will be assessed against the GCF investment criteria, section 6
4.3	<p>The statement "Scaling up solutions for climate change mitigation and adaptation in water security supporting the two inter-linked paradigm shifting pathways of water conservation and preservation of water <b>requires the mobilisation of private and commercial capital faced with limited public funding available</b>" (emphasis added) is concerning. The notion that it "requires" private finance prejudices the type of finance. It also risks creating situations where water, which is a public good, is privatized and instead of protecting the right to water and water security, it undermines and harms water security.</p>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. Please note the sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways that focus on mitigation and adaptation, with water sector projects welcome in all areas that address climate adaptation and mitigation. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including water accessibility and affordability to everyone, in addition ESS safeguard, gender and social inclusion and indigenous people.

4.3	We applaud the reference on p. 32: "[s]till, in situations where existing institutional capacity is low and investor risk perception is high, this would initially be in the form of technical assistance and policy development in collaboration with selected AEs and recipient countries to create an enabling environment, rather than directly scaling up financial flows." We would suggest that Technical Assistance in countries characterized by structural and institutional weakness is delivered first and foremost in line with global objectives and commitments on water security and resilience, and not conditional on blended finance outcomes.	International Committee of the Red Cross (ICRC)	Thank you for your comment
4.3	This sentence does not read well. What are the broader political issues mentioned?	UNDP	Thank you for your comment, text reworded for clarity
4.3	Not very clear what is meant here? Maybe add a reference to the study	Germany BMZ	Thank you for your comment, text reworded for clarity
4.3	This references the "GCF private sector strategy," which has yet to be adopted.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6
4.3	In addition to flood resilience and carbon sequestration, ecosystem approaches allow for increased water capture, recharge and improved quality. Please do not constrain the role of EbM/Ecosystem services to these two services but consider how utilities need to consider sustainable source water management and conservation as part of an integrated water res. Mgmt./and Nature based solution to multiple climate problems in the water sector.	UNDP	Thank you for your comment and agreed. The sectoral guide focuses on guiding investments towards the two paradigm-shifting pathways, with water sector projects welcome in all areas that address climate adaptation and mitigation. Concept notes will be assessed on their mitigation/adaptation potential and the multiple benefits they provide, including reducing transboundary conflicts over scarce water resources. Section 6 provides the GCF Investment criteria for impactful proposals
4.3	The summary of the goals and examples of financing instruments in this table are geared only to commercial/private sector investments and thus further reinforcing the underlying bias of the draft water security guide. While "grant investment projects for community-based water security-projects, increased resilience of the vulnerable people; and additional co-benefits for gender and Indigenous people" are mentioned (which is good), they are referenced under "Technical Assistance" = grant support in blended (private sector engagements). This relegates those investments, which should be the core and priority set of investments under a water security sector guide to a little "side-show" of primarily private sector finance engagement by the GCF. This seems like misplaced priorities. In this context it is notheworthy – and a vivid contrast to this "wishful thinking by the guide's authors" – that all four case-studies (in CHAPTER 5) are for PUBLIC-SECTOR, largely grant-focused investment projects (which are used for showcasing the priorities for transformational planning and programming, catalysing climate innovation, mobilising funding at scale, and coalition and knowledge to scale up success).	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment. All projects from public and private entities will be assessed against the GCF investment criteria, section 6 including ESS safeguard, gender and social inclusion and indigenous people. Given the pressure on public sector finance to meet the climate actions targets under UN-SDG6, it is critical to attract private, institutional, and commercial financiers together with IFIs, including the GCF in climate finance in general and water security in particular. Also note, one of the financial instrument that GCF provide is grant, that provides Technical assistance for project development and capacity building to supplement loans and Grant can be approved on a reimbursable basis. All projects will be assessed against the GCF investment criteria, section 6
6	Projects generating public benefits without financial returns should be included here (e.g. reforestation of watersheds)	UNDP	Thank you for your comment, well noted
Section 5	We appreciate the examples given as they demonstrate the value of grant-financed public sector projects and how these projects can and are enabling water security and fulfill the expectations for transformational planning and programming, catalysing climate innovation, mobilising funding at scale, and building coalitions and knowledge to scale up success. It is equally telling that the GCF has excluded the following water-related investments it has previously approved as case studies, as they maybe signify decidedly less good practices, including FP040 ( EBRD in Tajikistan for a climate-resilient improvement of an old hydro dam); FP042 ( AFD Morocco) and FP043 (EBRD Morocco), all of them adaptation projects. The two Moroccan projects are examples for maladaptation (building and providing water infrastructure for agricultural intensification in a semi-arid climate), as well as for PPP approaches to water infrastructure that are problematic (in the given example with the public sector fully paying for the infrastructure construction up front, while the private sector in exchange for operation and maintenance reaps unlimited service and access fees). Both cases also highlight a problematic prioritization of private sector/business use over public/household level needs and use (including gender-discriminatory practices by not taking women's household and care provision needs into account). The GCF should build on the positive examples it has included and learn from the not so positive examples it has not included rather than trying to reinvent the wheel.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment and well noted
5. Case Studies	The inclusion of case studies is extremely helpful in identifying the type of projects that could be pursued, each innovative and impactful.	UNDP	Thank you for your comment

5. Case Studies	It would be beneficial for other AEs to learn from these on-going projects. What would be useful, in addition to the information presented here, is to add a short paragraph that highlights the main challenges encountered by each project in implementing water security focused activities, and how the AE went about to address them.	WFP	Thank you for your comment
6. GCF Investment criteria for impactful proposal	An issue that also concerns us when evaluating projects is that we should consider the detrimental effects that some measures may have on the sustainability of water resources, groundwater, associated ecosystems and biodiversity, and the population.	Spain MoE	Thank you for your comment, .All projects will be assessed against the GCF investment criteria, section 6
Section 6	The indicators associated with "paradigm shift" in the table under water conservation, efficiency and re-use appear quite linked to discreet project impacts when one would have expected to see more structural/ macro level type of indicators there too (regulatory aspects, policies established, etc...)	UK FCDO	Thank you for your comment, what is provided is an example. The key aspect of the paradigm shift in water security to occur, there is a strong need to move climate finance from grant funding to concessional finance and then enable private and commercial finance for significant scale-up and replication to meet the financing need of the water sector. In terms of paradigm shift, the concept note may emphasize one or multiple factors : i) Innovation; ii) Potential for scaling-up and replication (e.g. multiples of initial impact size) for both mitigation and adaptation; iii) Potential for knowledge and learning; iv) Contribution to the creation of an enabling environment; and v) Contribution to the regulatory framework and policies; and vi) Overall contribution to climate-resilient development pathways consistent with a country's climate change adaptation strategies and plans
Section 6	FAO suggests including a term in Table 8 Investment Criteria (under Efficiency and Effectiveness) which clarifies the O&M responsibility and secures the prior commitment of the entity responsible for O&M. In so doing, the risk of rapid deterioration of developed projects due to lack of O&M finance after project completion could be minimized.	Food and Agricultural Organization of the United Nations (FAO)	Thank you for your comment, .All projects will be assessed against the GCF investment criteria, section 6
Section 6	The second and third columns of Table 8 seem like a mix of outputs and questions/check lists - not really investment criteria. Suggest clarifying the table headings and description.  Also, the idea of developing a new asset class is referenced here in the table and several places throughout the document, but the document does not effectively describe what this means in practice and how projects can support its development. More detail is needed on this particular topic.	World Bank	Thank you for your comment. The heading of the table amended and the new asset class defined and described in the document where appropriate in several locations with example of water project in south africa
6. GCF Investment criteria for impactful proposals	We suggest making this broader, independent of sector including quality. E.g. Volume of water supplied and water quality improved	UNDP	Thank you for your comment, text reworded and amended as required
6. GCF Investment criteria for impactful proposals	Shouldn't investment criteria be a clear criteria that can be used to evaluate whether an investment proposition shall be financed by GCF or not? The column "investment criteria" rather looks like a definition/summary of concepts and not so much as investment criteria. The 2nd and 3rd column are wonderfully clear though. However, questions should be replaced by criteria / indicators.	KfW	Thank you for your comment, text reworded and amended as required
Section 6	Under the <u>Recipient Needs</u> criteria, the following adjustments should be made: 1) Reference to "involvement" of vulnerable groups in the implementation of ecosystem-based management for water security is not strong enough ; involvement of local organizations should be a "must", not a "can"; involvement should be qualified to define decision-making with respect to focus and benefit sharing; 2) Women, girls and youth aren't the only vulnerable groups and that should not be implied as it is by saying "Are vulnerable groups (women, girls, and youth) targeted in the climate policies?" This should have an "e.g." or a "for example" or "among others" in the parentheses as well.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment

Section 6	Under <u>paradigm shift criteria</u> we find the “volume of biogas and biomass” recovered from wastewater an entirely unsuitable indicator for a paradigm shift in water security. This reference should be removed	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, what is provided is an example. The key aspect of the paradigm shift in water security to occur, there is a strong need to move climate finance from grant funding to concessional finance and then enable private and commercial finance for significant scale-up and replication to meet the financing need of the water sector. In terms of paradigm shift, the concept note may emphasize one or multiple factors : i) Innovation; ii) Potential for scaling-up and replication (e.g. multiples of initial impact size) for both mitigation and adaptation; iii) Potential for knowledge and learning; iv) Contribution to the creation of an enabling environment; and v) Contribution to the regulatory framework and policies; and vi) Overall contribution to climate-resilient development pathways consistent with a country's climate change adaptation strategies and plans
Section 6	Under the <u>sustainable development criteria</u> the following issues need to be considered and changed/adjusted: 1) The relationship with the SDGs is too narrowly correlation only with SDG 6 (SDG 5 is equally relevant; 2) A wrong trade-off as a possibility is proposed between social and environmental goals and carbon benefits; water security has to prioritize social goals, including providing access to water as a human right; 3) Gender-related development impact is too narrowly focused on what women can contribute (= the service they can provide in implementing low carbon development actions in water security), but not on how water service provision can reduce the care burden/drudgery of women = this is not mentioned at all. 4) Under social benefits, the table should explicitly acknowledge Indigenous Peoples and <b>“Valuing local and traditional knowledge, including of Indigenous Peoples, in decision-making and recognising the need for widespread community support ...”</b>	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, , text reworded and amended as required. All projects will be assessed against the GCF investment criteria, section 6. For example for SDGs Economic co-benefits, such as the creation of jobs, poverty alleviation and enhancement of income and financial inclusion, especially among women Social co-benefits, such as improvements in health and safety, access to education, cultural preservation, improved access to energy, social inclusion, improved sanitation facilities and improved quality of and access to other public utilities such as water supply Environmental co-benefits, including increased air, water and soils quality, conservation and biodiversity Gender empowerment co-benefits outlining how the project will reduce gender inequalities
Section 6	It does not become clear whether these are examples or criteria all (or some of them) to be met in order to be eligible. If all of the mentioned aspects are supposed to be addressed by one project, this might be difficult (comment under “investment criteria”)	KfW	Thank you for your comment, these provided as an examples. All projects will be assessed against the GCF investment criteria <a href="https://www.greencimate.fund/projects/criteria">https://www.greencimate.fund/projects/criteria</a>
Section 6	Volume of treated wastewater supplied to the agricultural and/ or industrial sector (comment under “Enhance water conservation, water efficiency and water re-use”)	KfW	Thank you for your comment
Section 6	The paradigm shift in the text refers to multiple dimensions of resilience and mitigation as well as financing aspects. The investment criteria focus only on the financing instruments offered. This seems to be very limited to one aspect that is largely depending on the debt absorption capacity of the partner country (comment under “paradigm shift”).	KfW	Thank you for your comment, what is provided is an example. The key aspect of the paradigm shift in water security to occur, there is a strong need to move climate finance from grant funding to concessional finance and then enable private and commercial finance for significant scale-up and replication to meet the financing need of the water sector. In terms of paradigm shift, the concept note may emphasize one or multiple factors : i) Innovation; ii) Potential for scaling-up and replication (e.g. multiples of initial impact size) for both mitigation and adaptation; iii) Potential for knowledge and learning; iv) Contribution to the creation of an enabling environment; and v) Contribution to the regulatory framework and policies; and vi) Overall contribution to climate-resilient development pathways consistent with a country's climate change adaptation strategies and plans
Section 6	Instead of the questions please insert indicators / criteria (see second row, second column).	KfW	Thank you for your comment
Section 6	Perhaps easier: Number of women part of operating or planning institutions relevant to water security projects (see “Gender-sensitive development impact”).	KfW	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6

Section 6	It mentions "Reduction of water pollution: area of healthy wetlands and river": this formulation excludes the rehabilitation of wetlands and ecosystem as it is often the case in our sanitation projects where the treatment comes to remove an existing pollution.	AFD	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6
Section 6	Section 6 (GCF Investment criteria for impactful proposals). One high-impact area for investment is still lacking; climate resilience of coastal areas through ecosystem-based adaptation and nature based solutions, in areas which are prone to extreme weather events and sea level rise.	Both ENDS	Thank you for your comment, this area presented in the guide. The table only provide few examples. It is not mean to provide all criteria and indicators in that table.
Section 6	Section 6 (GCF Investment criteria for impactful proposals) on "Recipient Needs" mentions "Developing participatory monitoring creates stakeholder ownership, especially full and continuous participation of relevant underrepresented stakeholders, such as Indigenous peoples and community leaders throughout the process". The special attention that is given to these stakeholders in participatory monitoring is much appreciated, but the recipients/beneficiaries of interventions should also be able to meaningfully participate in the design and implementation of the intervention funded by GCF. "Number and level" of stakeholder engagement should also specify "inclusiveness and gender responsiveness" of key decision-making processes in water management	Both ENDS	Thank you for your comment, this area presented in the guide. The table only provide few examples. It is not mean to provide all criteria and indicators in that table.
Section 6	Section 6, Table 8: Investment criteria: throughout this table and in the draft guide, women are seen as vulnerable groups only and there is a focus on a gender-sensitive approach and ensuring women's contribution, rather than a gender-responsive approach actively promoting women's leadership in achieving water security, addressing gender inequalities and reducing women's burdens bearing the primary responsibility in water collection.	Both ENDS	Thank you for your comment, this area presented in the guide. The table only provide few examples. It is not mean to provide all criteria and indicators in that table.
Section 6	Whereas Section 3.2.2 mentions that "Governance is one of the key limitations to implementing IWRM", Section 6 (GCF Investment criteria for impactful proposals) does not require specific investment criteria for strengthening of governance. Moreover, whereas Section 3.2.2 rightly mentions that "The key success factors [for water governance] lie in empowering communities into decision making ...", no reference is made to 'the empowerment of communities in decision-making' in the investment criteria of Section 6. Effective water governance relies not only on 'country ownership'; it also relies heavily on the ownership of the communities who live in the intervention area, for which the meaningful participation of communities during the design, implementation and monitoring stages is critical.	Both ENDS	Thank you for your comment, under the sustainable development, the guide indicate in the table: Valuing local and traditional knowledge including of indigenous peoples, in decision-making and recognising the need for widespread community support contributes to cultural preservation
Section 6	Under section 6, line 1004: "Table 8: Investment criteria examples for the two water security paradigm shifting pathways", we note that the first investment criteria "Impact" states: "High-impact areas in water security are those with high to extreme water stress".  We would like to understand what weight this investment criteria holds, and whether a country's/area's status as "high to extreme water stress" will be an overriding factor when deciding where to target GCF water security related climate finance? If so, we would see some potential challenges with this approach, as we understand that water stress indicators such as those used by WRI and FAO AQUASTAT include withdrawals, and therefore the driver of water stress in a country or area may be more driven by socio-economic issues than by climate change. That leads us to question if it is the best indicator to use to target finance, as it does not necessarily reflect climate change risks to water security.  If strictly followed, this indicator could then skew funding more towards the typically higher water stressed countries in MENA and South Asia regions, as many countries in other regions are not classed as highly water stressed, except for some small areas within those countries. This could then seem to go against the stated priority regions (i.e., Africa, SIDS, LDC) communicated to the WASH sector colleagues at the call with GCF on 3rd Feb 2022.  It would be good to understand a bit more the reasoning behind the use of water stress as an investment indicator and to get some reassurance that funding will indeed not be limited to highly water stressed countries/areas, but also that there is flexibility to allow targeting of GCF water security related climate finance to areas that are at high risk of climate change impacts to broader water security.	Stockholm International Water Institute (SIWI)	Thank you for your comment. All projects will be assessed against the GCF investment criteria, section 6 equally. The water stress can be at different scale in relation to the problem that indicated by climate changes such as at country, region, district, specific city/town, etc
7. Conclusion	Consider explicit consideration of how EBA/NBS approach can meet needs across adaptation and mitigation, and what would be required for their systematic and consistent consideration in the water sector to achieve transformative changes.	UNDP	Thank you for your comment, it has discussed under the pathway 2 in the relevant section
7. Conclusion	It should be noted that the coalition of Public Development Banks (PDBs) in the water and sanitation sector, the Water Finance Coalition, created at the initiative of AFD within the framework of the 2020 CIF, seems to fit perfectly into the following axis: "Collaborate with development finance institutions, international finance institutions, and "patient capital" 1046 private investors to mobilize investment at the portfolio level and support the expansion of domestic 1047 financial investment throughout the water sector"	AFD	Thank you for your comment and GCF is involve and collaborating in this work with AFD

Conclusion	The conclusion makes reference to "future technical annexes in flood management, sponge cities, smart water management, and circular economy" to be added to the water security sector guide, which should be likewise transparently shared in draft form for stakeholder input and feedback.	GCF Observer Network of Civil Society Organizations, Indigenous Peoples and Local Communities (GCF Observer Network)	Thank you for your comment, noted and this is the intention of these future annexes once they are ready for consultation.
Reference	Please consider adding in the references also the publication "Financing Climate Change Adaptation in Transboundary Basins: preparing bankable projects" published in December 2018 and prepared by the World Bank in cooperation with the UNECE, the International Network of Basin Organizations (INBO), the African Water Facility/ African Development Bank, the Netherlands and Switzerland. <a href="https://unece.org/info/Environment-Policy/Water/pub/21764">https://unece.org/info/Environment-Policy/Water/pub/21764</a>	UNECE	Thank you for your comment