

TRANSFORMATIONAL CLIMATE FINANCE: KENYA'S COUNTY CLIMATE CHANGE FUNDS

Lessons for Practice

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TRANSFORMATIONAL CLIMATE FINANCE GUIDANCE SERIES //

Case Study

TOPICS

- Transformational Climate Finance
- Locally-led Finance
- Transformational Change

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SUMMARY AND KEY LESSONS

The experience of the County Climate Change Funds in Kenya is seminal in the development of approaches to devolved climate finance and the promotion of transformational, locally led climate adaptation action. It played a crucial role in shaping localized climate finance approaches and demonstrating how global climate finance can reach the most vulnerable communities effectively and efficiently to support climate-resilient development and effective adaptation.

The CCCF mechanism began in 2011 as a pilot program in Isiolo County, then was expanded to four more arid and semi-arid counties in 2013 and is now being rolled out nationwide. It consists of four interlocking and complementary elements:

- Devolved finance through the establishment of countymanaged funds to finance climate action as prioritized by local communities, using public and private resources from local, national, and international finance streams.
- Public participation through the establishment of countyand ward-level climate change planning committees.
- Climate-resilient planning by applying tools that integrate climate information services and local knowledge to empower community members and produce effective local climate action.
- Monitoring, evaluation, and learning to enable outcomes to be tracked and lessons to be shared between wards and counties.

The CCCF approach aligns with the Principles for Transformational Climate Finance formulated within the Transformational Change Learning Partnership (TCLP), which emphasize equity, inclusion, and the urgent need for increased climate finance at local levels. The CCCF illustrates the transformational power of bottom-up, locally led learning

processes when supported by flexible, committed funding and technical partners and a conducive and dynamic national policy environment.

The experience of the CCCF mechanism in Kenya is rich, and many lessons can be drawn. The following nine insights are presented here as overarching guidance that can assist teams to design adaptation programming with transformational intent.

Integrate an understanding of the political context.

The Kenyan drylands were fundamentally climate vulnerable due to their political, social and economic marginalization. The experience of the CCCF suggests that in order to achieve transformational impact, it is essential to understand where the entry points are to change power relations and to transform planning systems so they respond to local realities.

Establish clear principles for accountability and social inclusion.

Rigorous criteria for inclusion in ward planning committees were established from the start of the CCCF mechanism and expanded over time to include disability and youth as well as gender. The principle of bottom-up democratic selection of committee members was also important and ensured that representatives were committed to probity and to the public good.

Devolve decision-making to the lowest appropriate level.

While ward-level planning structures took all relevant decisions about prioritizing local investments, 20 percent of the budget was allocated to county-level investments, and 10 percent was devoted to strengthening participatory planning and consultation systems, under the guidance of the County Planning Committee.

Give certainty to actors at all levels about the resource envelope available to them for implementation.

The principle of allowing ward committees to plan in a context where they were certain of the volume of finance available to them created trust and enabled them to learn how to prioritize investments with a strategic perspective.

Integrate local knowledge and climate information systems.

The engagement of the Kenya Meteorological Department with the CCCF pilot had immense learning benefits for all parties. Communities became informed about climate impacts and better able to plan adaptation actions, while the Kenya Meteorological Department learned how to make its work relevant to communities. The use of innovative tools such as participatory digital resource mapping enabled the capturing and integration of Indigenous knowledge.

Support coalitions with transformational intent.

Coalitions that bring together civil society, public institutions, national and international actors with complementary experience and skills are important for long-term processes of change.

Establish clear principles to guide scaling out of devolved climate finance systems.

For the long-term sustainability and scaling up of successful experiences with locally led action for transformative adaptation, it is important to develop firm principles to underpin equity, inclusion, and sustainability that multiple funding partners can adopt and adhere to.

Develop adaptive learning systems at all levels.

Effective monitoring, evaluation, and learning systems at all levels facilitate effectiveness. Learning systems are also about transparency and community engagement. The flow of information back to the grassroots was critical to the success of the CCCF experience.

Adopt a phased approach.

Allowing space for learning by doing, with patient support from funders was critical to the development of the CCCF mechanism. The willingness of bilateral donors to take risks on a new approach was important to give space for the participatory planning, implementation, and governance system to develop.

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LIST OF ABBREVIATIONS

ASAL	Arid and Semi-Arid Lands region
CCCF	County Climate Change Funds
MEL	Monitoring, evaluation, and learning
TCLP	Transformational Change Learning Partnership



1. INTRODUCTION

In 2011, Kenya launched its County Climate Change Funds (CCCF) as a pilot program to deliver climate finance to local communities in a highly vulnerable drylands region and empower them to design and implement their own climate solutions, with strong public participation. By 2018, it covered five counties, and since 2019, the government has been expanding it to the entire country.

The CCCF has been widely studied as a successful example of localized approaches to climate finance. This briefing paper, an output of the Climate Investment Funds' Transformational Change Learning Partnership (TCLP), distills lessons from the CCCF for climate finance practitioners wishing to achieve transformational outcomes in adaptation and resilience-building. It builds on a case study presented at a TCLP workshop in May 2023.

The TCLP defines transformational change for climate action as "a fundamental change in systems relevant to climate action with large-scale positive impacts that shift and accelerate the trajectory of progress toward climate-neutral, inclusive, equitable, resilient and sustainable development pathways." This paper traces the history of the CCCF, examines how it fits with the TCLP's seven principles for transformational climate finance, and draws out key insights for practitioners.

The CCCF showed how a locally driven finance mechanism could efficiently tap into global climate funds to support vulnerable communities in building their own resilience,² and it significantly influenced the development of the Principles for Locally Led Adaptation, which have now been adopted by over 120 governments, global institutions, and nongovernmental organizations (NGOs).³

The CCCF stands out for the transformational change it has achieved and for its demonstrated ability to operate at scale. The analysis presented here starts from the recognition that devolved climate finance is one of several options for promoting transformational, locally led adaptation,⁴ and draws lessons that can be applied to other models and contexts. Section 2 provides an overview of the CCCF; Section 3 examines how it fits with the TCLP principles; and Section 4 summarizes key insights.

2. ELEMENTS AND EVOLUTION OF THE KENYA CCCF

The CCCF mechanism consists of four interlocking and mutually reinforcing components:⁵

Devolved finance: A fund is set up in each county, managed by the county, to finance climate action as prioritized by local communities. The money comes from a wide range of sources including international actors such as multilateral funds, bilateral donors, and international organizations, the National Climate Change Fund, and county budgets. International finance can flow to county funds directly or through a national entity. County governments guarantee minimum funding as a share of their annual development budget (to date this has typically been 1–2 percent).

Public participation: A Climate Change Planning Committee is set up in each ward—a sub-county unit comprising multiple villages—made up of residents of the constituent villages. Regulations require these committees to include all stakeholder groups, with mandatory representation of women and youth. The ward committees, whose members receive special training, facilitate participatory processes to identify local climate action needs and priorities, working with village council members, community groups, and representatives of vulnerable populations. Ward committee representatives, in turn, come together in a county-level committee that also includes county government officials, technical experts from national government agencies, and civil society. The county



committees evaluate and approve project proposals, with input from participatory processes, and then monitor projects and report outcomes to the county and national governments.

Tools for climate resilience planning: To support effective project planning and execution, the CCCF provides ward committees with downscaled climate information from the Kenya Meteorological Department, as well as tools for participatory vulnerability and resilience assessments and digital resource mapping. The use of these tools enables communities and county government planners to have more informed discussions about factors that strengthen or weaken local livelihood systems in the face of climate variability and change (differentiated by production system, gender, and age). The integration of local knowledge and climate information also empowers people to explain the logic of their adaptation strategies to outsiders, such as government planners and NGO staff.

Monitoring, evaluation, and learning (MEL): A

consistent system to track and evaluate climate action financed through the CCCF fostered learning within and among counties and improved project outcomes. Both county- and national-level MEL systems were strengthened so they could track and assess whether the CCCF mechanism was appropriate and cost-effective for building local adaptive capacity and promoting climate-resilient development in vulnerable communities. Rigorous and consistent MEL systems also created a significant body of evidence on process and results.

As several analyses have noted, these four interconnected components make the CCCF much more than a source of finance: it is a sophisticated governing mechanism.8 When a county joins the program, it adopts the four components through county legislation or executive decrees. The Ward Climate Change Planning Committees, whose members are selected by their communities, enable stakeholders identify their own priorities and propose projects for funding. This process receives support from county government officials and civil society actors to align local priorities with national strategies,



identify synergies and opportunities to scale up projects, and strengthen the proposals and projects with locally relevant climate data and technical expertise. The County Climate Change Planning Committees ensure that CCCF funds are spent in accordance with local priorities, while also providing accountability to the national government and to the funders. Figure 1 provides an overview of the different elements.

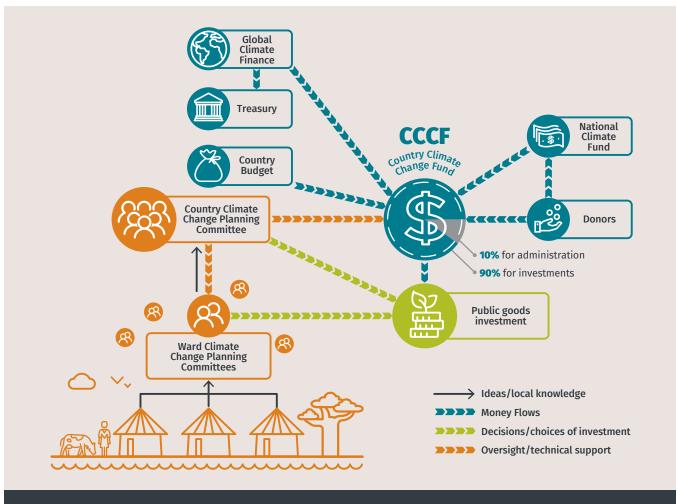


FIGURE 1. Devolved Climate Finance in Kenya

Source: Reproduced from Orindi et al. (2021).

2.1 How the CCCF Fits into Kenya's Climate and Policy Context

The CCCF grew out of a pilot County Adaptation Fund established by the Adaptation (Ada) Consortium in 2011–2012 in the larger Isiolo area (now Isiolo County), which is part of Kenya's Arid and Semi-Arid Lands (ASALs) region. Climate change is exacerbating drought and water stress risks in East Africa,9 and the ASALs are particularly vulnerable to climate risks due to a historical legacy of political, social, and economic marginalization, as well as inadequate government planning systems.

Water availability in drylands environments is inherently variable and uncertain, with significant

seasonal and interannual variations in rainfall and both drought and flood risks. Dryland communities have traditionally adapted their livelihoods to take rainfall and environmental variability into account in their livestock and crop production strategies. Development policies have often failed to recognize local knowledge, however, and this has undermined the resilience of dryland communities.¹⁰

In 2010, Kenyans voted to approve a new Constitution that called for devolution as a way to give the people a greater say in decisions that affect them, and to share resources more equitably. Significant discretionary authority over planning (including policy and legislative powers) was transferred to county governments, along with new responsibilities and

funding. This created a suitable context for piloting a devolved climate finance mechanism.

Also in 2010, the Ministry of State for the Development of Northern Kenya and other Arid Lands¹² sought partners to help strengthen planning in Kenya's drylands and develop policies that were more suited to the social and ecological context. The CCCF grew out of that effort, building on the Kenyan government's commitments to both effective devolution and new approaches in the ASALs.

2.2 The CCCF Pilot Phase

The original County Adaptation Fund was financed by the UK Department for International Development (DFID) and the Catholic Organisation for Relief and Development Aid. It was run by the Ada Consortium under the guidance of the Ministry of State for the Development of Northern Kenya and other Arid Lands. Other key partners were the Ministry of Planning, the International Institute for Environment and Development (IIED), and the UK's and Kenya's meteorological services. The two-year pilot included the design and testing of the fund as well as an effective monitoring system. It provided benefits for some 18,000 people in Isiolo County through improved water availability, pasture management, and animal health. Importantly, it demonstrated the capacity of ward-level institutions to manage effective adaptation and development processes.¹³

In 2013, Kenya's two other Arid Land counties, Garissa and Wajir, were added to the program, followed by two Semi-Arid counties, Makueni and Kitui, with Christian Aid leading implementation in those two counties. Also that year, devolved climate finance was placed under the authority of the National Drought Management Authority (NDMA). In 2016, the Swedish Embassy in Nairobi provided additional resources. Initial support went to public good investments in Wajir and Makueni. The operational mechanism for the Ada Consortium from 2013 to 2018 was a memorandum of understanding (MoU) with the NDMA. County-based Community Development Organisations (CDOs) joined the consortium, including Womankind

Kenya, Anglican Development Services-Eastern, Resource Advocacy Program and the Arid Lands Development Focus.¹⁴

A technical committee oversaw the development of the CCCF mechanism during this period, chaired by the NDMA and involving the Climate Change Directorate, the National Treasury, and the Ministry of Environment. An important strength of the consortium was an ability to recognize the value of the different experience and expertise of both national and international consortium members.¹⁵

Although there have been no longitudinal studies to assess the long-term impacts of CCCF pilot investments, several studies—from focused qualitative case studies to large-scale household surveys—have documented strong positive impacts of CCCF investments on beneficiary households and communities.¹⁶ Studies of the impacts of the early pilot projects in Isiolo County had shown similarly positive results.¹⁷

Across all five counties, the studies found, households benefited from improved access to water for domestic and livestock use, and they spent less time fetching water, particularly women and girls. The studies also documented additional direct and indirect benefits, including improved livelihoods and food security; new economic opportunities such as vegetable gardens, small-scale irrigation, and tree nurseries; improved incomes from selling milk, meat, and other produce; reduced cost of accessing water; improved livestock health and better-quality meat; fewer conflicts within households and communities and between neighboring villages; educational benefits for boys and girls, who could attend school for longer; and strengthening of customary natural resource management institutions.

A recent detailed review of CCCF water investments in the five dryland counties found that 62.9 percent were still fully functional and the rest either partially functional or non-functional. Where water facilities were not fully functional the problems were related to either poor use of hydrological information in design, or to governance and



management deficiencies leading to inadequate operational maintenance. Recommendations for future practice include: better integration of climate and hydrological information into siting and design; strengthened capacity of county government and community water management committees; better supervision of contractors; increased external support to communities in managing water investments; strengthened cross-border conflict mechanisms; improved water resources monitoring; and the development of a quality assurance framework.¹⁸

2.3 Moving to the National Scale

Kenya's National Adaptation Plan 2015–2030¹⁹ and National Climate Change Action Plan (2018–2022)²⁰ both explicitly supported scaling up the CCCF. The government saw the mechanism as a way to increase funding at the local level to support adaptation action, and also to create county-level legislation aligned with the national Climate Change Act of 2016.

Since 2019, the CCCF has been overseen by the National Treasury, which has driven the nationwide rollout of the devolved climate finance system, through establishment of a National Climate Change Fund. By 2021 more than 80 percent of the counties in Kenya had developed their own climate change act and had established County Climate Change Funds. By 2023, all 47 counties in Kenya had these in place and were ready to access large-scale climate finance.

The successful experience of the devolved climate finance mechanism piloted in the drylands has provided a base for the national government to engage a range of new funding partners. A significant challenge is to maintain the key elements that drove the effectiveness and transformational character of the CCCF mechanism in its pilot phase as new donors, with new requirements, are brought in to support the scale-out.²¹ In October 2021, the World Bank, which has provided technical and financial support for devolution in Kenya for several years, announced US\$150 million in funding for a new Financing Locally-Led Climate Action Program (also funded by the governments of Denmark and Sweden).²² The program has provided support for capacity building at the county level in conjunction with the nationwide rollout of the CCCF mechanism.²³

3. TRANSFORMATIONAL CHARACTER AND IMPACTS OF THE CCCF

In the context of climate change adaptation, transformative action and impacts have some specific characteristics. In the face of major climatic shifts, measures that help people to cope with climate change or to adapt incrementally may prove inadequate in the long term. ²⁴ Moreover, as illustrated by Kenya's ASALs, the root causes of vulnerability are predominantly socio-political. People and communities are marginalized and/or denied equitable access to resources, and policies are adopted that are inappropriate to the context. Effective adaptation strategies therefore need to address power relations and how they bear on policy, regulation, and resource allocation.

That is the purpose of transformative adaptation: to drive fundamental systemic changes to address

the root causes of vulnerability. In order to understand the extent to which the CCCF has been transformational, the evidence from the studies conducted so far²⁵ was analyzed from the perspective of the seven principles for transformational finance developed by the TCLP.²⁶

1. Focus on varied needs and contexts

The coalition that built the CCCF mechanism had a deep understanding of the livelihood systems, social structures, and local political economy of the Kenyan drylands, which was crucial for effective adaptation action. The mechanism was also designed to be adaptable to different contexts. The CCCF's rigorous



principle of giving communities the power to identify priorities ensured that investments and actions were geared to needs identified through local democratic processes.

2. Be boldly inclusive

Inclusive participatory processes are central to the CCCF. A rigorous democratic selection process for ward planning committees includes criteria on gender inclusion, public integrity, and local knowledge to ensure members are representative of and accountable to local people.²⁷ These deliberate efforts have enabled women and other marginalized groups to propose investments aligned with their needs and priorities. As a result, women have been key beneficiaries of CCCF investments, through reduced labor burdens and increased income-generating opportunities.²⁸

3. Unlock systemic change

Advance notice to ward-level planning committees of their budget envelope for investments has empowered them to set priorities and enabled a deliberative, accountable planning process. Other evidence of systemic change includes:

- Women and youth becoming more visible and active within communities.
- Enhanced citizen and community participation in broader county-level planning processes.
- The CCCF mechanism has helped the Kenya Meteorological Department to improve the way it delivers county level climate information.

4. Provide de-risked, small, and decentralized solutions

The CCCF mechanism in Kenya has been absolutely focused on supporting locally led climate action: devolved climate finance, decentralized planning, and local action. Risk has been managed by empowering local people and institutions and ensuring they were

in a position to select representatives and contractors they trusted to deliver. The meaningful and effective decentralization processes implemented in Kenya since 2010 onwards played a key role in making this possible.

5. Streamline processes

Processes for communities to democratically select micro-investments and activities to build resilience were designed to be as simple, intuitive, and contextually appropriate as possible, while assuring both accountability and good financial governance. Flexible approaches from the two principal donors in the early phases (the UK and Sweden) were critical in allowing the program to operate with simple, accessible procedures that emphasized community agency and choice.²⁹

6. Work collaboratively to mobilize finance

By 2018 all five counties in the CCCF pilot had legislation or regulations in place that committed county governments to transfer 1–2 percent of their development budgets to the CCCF. The flexibility of the structure has allowed donors to fund counties directly, if they wish, or channel finance through the national fund. At the time of writing, the Government of Kenya is negotiating to access support from the International Monetary Fund (IMF) Resilience and Sustainability Fund and from a "debt for climate" swap with KfW, the German development bank.

7. Create robust systems for monitoring, evaluation, and learning

Monitoring, evaluation, and learning systems were integrated from the start and are one of the four core components of the CCCF mechanism, enabling effective learning between counties.



4. LESSONS FOR THE PRACTICE OF TRANSFORMATIONAL CLIMATE FINANCE

The CCCF case exemplifies how devolved climate finance can effectively channel global climate finance to vulnerable communities, promoting resilience and sustainable development. The model has also proven to be flexible enough to be adapted to various contexts and scaled up nationwide. Moreover, as shown above, the mechanism is closely aligned with the TCLP principles.

The experience of the CCCF mechanism in Kenya is rich, and many lessons can be drawn for practitioners in climate finance. In this section we distill nine lessons as overarching guidance that can assist teams to address the design of adaptation programming with transformational intent.

Integrate an understanding of the political context.

The Kenyan drylands were climate vulnerable due to their political, social and economic marginalization. The experience of the CCCF suggests that in order to achieve transformational impact, it is essential to understand where the entry points are to change power relations and to transform planning systems so they respond to local realities.

Establish clear principles for accountability and social inclusion.

Rigorous criteria for inclusion in ward planning committees were established from the start of the

CCCF mechanism and expanded over time to include disability and youth as well as gender. The principle of democratic selection of committee members was also important and ensured that representatives were committed to probity and to the public good.

Devolve decision-making to the lowest appropriate level.

While ward-level planning structures in the CCCF made all relevant decisions about prioritizing local investments, 20 percent of the budget was allocated to county-level investments, and 10 percent was devoted to strengthening participatory planning and consultation systems, under the guidance of the County Planning Committee. This is an illustration of what Steinbach et al. (2022) call "integrated subsidiarity":

Recognizing that it is not possible to resolve all adaptation challenges at the local level, integrated subsidiarity means that effective solutions for overcoming risk are implemented across all levels, through vertically connected governance systems with co-governance arrangements giving far greater agency to local actors where possible. Integrated subsidiarity aims to enable multiple perspectives for collaborative decision making to resolve trade-offs and combine valuable local, traditional and cultural knowledge with scientific and technical knowledge.³⁰

Give certainty to actors at all levels about the resource envelope due to them for implementation.

The principle of allowing ward committees to plan in a context where they were certain of the volume of finance due to them created trust and encouraged stronger participation at all scales, including the community level. It also enabled ward committees to learn how to prioritize investments in line with a developing strategic perspective. In Isiolo, for example, the county developed an overarching strategy where ward committees agreed to move in sequence from a focus on water, to rangeland, to animal health. This enabled them to maximize their impact by harmonizing efforts at the landscape level,

and generate cooperative dynamics that reinforced the effectiveness of their actions to build resilience.

Integrate local knowledge and climate information systems.

The engagement of the Kenya Meteorological Department with the CCCF pilot work in the drylands had immense learning benefits for all parties. Communities became informed about climate impacts and better able to plan adaptation actions, while the Kenya Meteorological Department learned how to make its work relevant to communities. Indigenous and community members learned how to value their own knowledge as essential for planning, but also gained confidence to present their resilience-building strategies to outside agencies.

Support coalitions with transformational intent.

Coalitions that bring together civil society, public institutions, national and international actors with complementary experience and skills are important for long term processes of change. The Ada Consortium that drove the development of devolved climate finance in Kenya combined the legitimacy and "rootedness" of local partners, the knowledge and technical skills of government agencies, and the global perspective and connections of international agencies.

Establish clear principles to guide scaling out of devolved climate finance systems.

For the long-term sustainability and scaling up of successful experiences with locally led action for transformative adaptation, it is important to develop firm principles to underpin equity, inclusion, and sustainability that multiple funding partners can adopt and adhere to. When new funding partners join programs such as the Kenya CCCF, they will always bring new perspectives and new constraints. Building on success requires clarity about the areas where flexibility and change can have a useful creative impact—and the basic principles that underpin the transformational character of the model.

Develop adaptive learning systems at all levels.

As noted above, effective monitoring, evaluation, and learning systems at all levels facilitate effectiveness. Effective learning systems are also about transparency and community engagement. The fact that members of the ward committees are elected and come from communities provides a flow of information back to the grassroots. All information related to CCCF is public: everyone knows what is in the ward kitty, where it has been used, and how.

Adopt a phased approach.

Allowing space for learning by doing, with patient support from funders, was critical to the development of the CCCF mechanism. Bilateral donors deploying grant funding and able to take risks on a new approach provided the space needed for the participatory planning, implementation, and governance system to develop. Climate finance providers that trust local systems and give space and time for learning and development will always be an asset in the early phases of program development.



ENDNOTES

CLICK ON ANY NOTE NUMBER TO GO BACK TO THE REFERENCED PAGE

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- → 19 See https://www4.unfccc.int/sites/NAPC/Documents%20NAP/Kenya_NAP_Final.pdf.
- → 20 See https://faolex.fao.org/docs/pdf/ken190169.pdf.
- → 21 The ADA Consortium members - critical to the development of the CCCF mechanism in its pilot phase - formed a trust to support their work and have been able to

- play a supporting role working with National Treasury as the CCCF system was rolled out nationwide. Support to the Ada Trust has largely come from Financial Sector Deepening Programme (FSD-Kenya). FSD is funded by UK FCDO, SIDA among others.
- → 22 Arnold, M. and N. Soikan. 2021. "Kenya Moves to Locally Led Climate Action." World Bank. Nasikiliza (blog), October 27. https://blogs.worldbank.org/nasikiliza/kenya-moves-locally-led-climate-action.

See also World Bank. 2019. "Kenya's Devolution." Brief. November 26. https://www.worldbank.org/en/country/kenya/brief/kenyas-devolution.

- → 23 Once counties meet all the access criteria they should receive \$1.5-2 million per year to support climate adaptation programming. The IMF Resilience and Sustainability Fund is seeking approval from the IMF Board for funding of \$500 million for the FLLoCA/CCCF program. The Government of Kenya is also in discussions with KfW (Germany) for \$70 million of funding under a 'debt for climate' swap arrangement. (Peter Odhengo, workshop presentation, May 11, 2023.)
- 24 Fedele, G. et al. 2019. "Transformative Adaptation to Climate Change for Sustainable Social-Ecological Systems." Environmental Science & Policy 101 (November): 116–25. doi:10.1016/j. envsci.2019.07.001.
- → 25 Unless otherwise noted, the discussion below is based on the synthesis presented in Crick, F. et al., 2019, "Delivering Climate Finance at the Local Level to Support Adaptation: Experiences of County Climate Change Funds in Kenya."
- → 26 CIF. 2023. "Principles for Transformational Climate Finance to Advance Just and Equitable Climate Solutions."
- → 27 Wajir County's climate change legislation also includes provision for youth and disability as well as gender inclusion on Ward County Climate Planning Committees.
- → 28 Onaya and Rugano, 2018. "Gender Inclusion and the CCCF Mechanism:

- Increasing the Voice and the Benefits for Women."
- → 29 Personal communication with Ced Hesse and Victor Orindi.
- → 30 Steinbach, D. et al. 2022. "The Good Climate Finance Guide for Investing in Locally Led Adaptation", p. 5.

THE CLIMATE INVESTMENT FUNDS

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