Key Issues on Governance of Climate Change Finance

based on the proceedings of a meeting at La Redoute, Bad Godesberg, 9 August 2009

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Executive Summary

This brief is based on discussions moderated by Anders Wijkman at a meeting that took place at La Redoute, Bonn/Bad Godesberg on 9 August 2009. The meeting was part of a series of discussions convened by the ecbi on the governance of the financial mechanism of the UNFCCC. While being aware that the negotiations on the Financial Mechanism, its Architecture and Governance encompass many and complex issues, the meeting focused on three key issues of interest to all Parties:

i. **the options for disbursement of funding to support climate change activities at the country level,**

ii. **the modalities for channelling funding streams in support of these activities,** and

iii. **the role of existing institutions in a final agreement.**

Many Parties believe that coming to a workable understanding and agreement on these three issues would help advance significantly the negotiations on finance. The discussion was informed by the ongoing negotiations and particularly, by the negotiating text of the AWG-LCA, and focused on three areas of divergence:

i. **how resources should be channelled to countries and whether those not channelled through the UNFCCC qualify for recognition and credit,**

ii. **the constitution, makeup and mandate of the financial mechanism,** and

iii. **the degree of reform needed of what already exists.**
To stimulate the discussion, the Moderator presented arguments in support of three specific positions as follows:

i. **the case for devolution of decision-making to developing countries** and the need to move away from the present system of retaining funding decisions at the level of international institutions or donor agencies;

ii. **the case for consolidation of (international) funding streams** to supplant the present system characterized by fragmentation and lack of coordination; and

iii. **the case for major reform of the financial mechanism**.

**DEVOLUTION**

On devolution, some of participants wanted to know what it really meant in the case of climate change financing. Simply stated, it is a system of decision-making in which countries make their decisions on disbursement of funds to support programs and projects under rigorous standards and criteria. Under this system, it is possible that some of the functions, such as knowledge sharing and technology development systems, would remain at the international level. A more detailed analysis of these functions was requested. Some participants also brought up the issue of credibility and the need to build safeguards for adherence to standards and metrics of performance as well as oversight and auditing systems. In sum, devolution does not mean loss of control as many developed countries feared. Many potential benefits were also discussed such as encouragement for institution building, capacity development and buy in and ownership of their programs.

**CONSOLIDATION OF (INTERNATIONAL) FUNDING STREAMS**

On the case for consolidation of (international) funding streams, the main argument put forward by the presenters was that the present system of funding is fragmented and lacks coordination and coherence. A consolidated fund does not mean that all the decisions would be made by one body managing those funds. One of the fears posed by the participants was that a centralized fund would create bureaucratic obstacles and inefficiencies. A consolidated fund is not a centralized fund but a pass-through mechanism for funding stream to different themes but with allocation and disbursement decisions made by separate bodies responsible for doing so under rigorous allocation criteria. Technical advice and support functions as well as tracking performance on both sides (MRV) would be carried out elsewhere. Given the large scale of funds expected, it would be unrealistic to expect that all would flow through one funding channel. Most participants argued in favour of several funding streams.

**REFORM OF THE FINANCIAL MECHANISM**

On reform of the financial mechanism, the discussion centred on the degree of involvement of the UNFCCC regime in operating the funding of climate change and how much it should be left to function by itself. Most developing countries insist that most if not all must be under the authority of the COP and cite their displeasure with the GEF. Most agreed that regardless of the role of the COP, existing institutions still had a big role to play in several functions. Most agreed that there had to be greater automaticity in the funding streams and more systems to facilitate the flow, the tracking and the performance expected of these funds. This is where there is an urgent need to build national capacities and possibly national entities to link up with the international institutions to be created.
Introduction and Background

This policy brief is based on the facilitated discussions that took place at La Redoute, Bonn/Bad Godesberg on 9 August 2009, immediately prior to the intersessional informal consultations of the UNFCCC. The meeting was convened by Benito Müller, Luis Gomez-Echeverri, Surya Sethi and Anders Wijkman, who moderated the discussion. The participants are listed in Appendix 1.

During the course of this year, the European Capacity Building Initiative (ecbi) has been facilitating a round of informal consultations and briefings on possible institutional options for the governance of climate change finance in the future UNFCCC regime. This initiative was launched with the strong encouragement of a number of members of developed and developing country UNFCCC delegations. They felt that discussions on some very sensitive but crucial issues of importance to both on the subject could best be advanced through an informal platform where views expressed and options discussed openly in a frank manner under the Chatham House Rule.

In addition to this round of discussions, a series of briefs have been issued (as listed in Appendix 2). The preparation of two briefs – one on the Reformed Financial Mechanism and one other on the History of the Financial Mechanism – involved an intensive dialogue and global consultations with specialists, international lawyers, and experts from all over the world who have followed the climate change negotiations for over a decade. The round of consultations has involved both Annex I as well as non-Annex I Party delegations, plus individuals from non-governmental organizations and specialized institutions from both developed as well as developing countries.

The present Brief is part of this series and its purpose is to provide a summary of the discussions that took place at the meeting of August 9 of 2009 at La Redoute in Bonn prior to the inter-session meeting of UNFCCC in Bonn with 26 Party delegates and 5 ecbi resource persons.

Coming to an agreement on the architecture – the institutional and governance structure – of the financial arrangements to support the future climate change regime is a prerequisite to the success of the forthcoming Copenhagen Climate Conference. Less than four months away, it is clear that Parties are far from a consensus on what this governance structure should or could look like. In the negotiating text of the AWG LCA, there are a number of very good proposals which could lead to a workable solution.

The discussions at La Redoute were informed by the progress of the ongoing negotiations and built on the areas of convergence of the AWG LAC negotiating text which are numerous, as reported on the UNFCCC website.1

1. Areas of Convergence

The areas of convergence include:

- There needs to be a substantial provision of financial resources to further enhance the full, effective and sustained implementation of the UNFCCC and the fulfilment of the Bali Action Plan;

1 http://unfccc.int/files/meetings/ad_hoc_working_groups/lca/application/pdf/finance140809.pdf
There is a substantial gap between the financial resources required for enhanced action on mitigation and adaptation in developing countries and the level of resources currently available;

There is a need to provide scaled-up, new, additional, predictable, and sustainable financial resources;

Financing would be derived from multiple sources;

Principles of equity and common but differentiated responsibilities need to be the base;

Full transparency, efficiency, effectiveness, equitable, and balanced representation of all Parties;

The financial mechanism shall function under the guidance and be accountable to the COP;

Coherence and coordination between the financing under the COP and the various financial mechanisms and individual funds to reduce fragmentation in the implementation of the Convention and promote access to the variety of available funding;

Simplified and improved access to financial resources;

Delivery of financial resources to follow a programmatic approach, using a project approach when appropriate;

Country driven;

All developing country Parties are eligible for the funding, with special consideration for the needs of vulnerable countries;

Funds shall be allocated for adaptation, mitigation, technology transfer and capacity building in a balanced manner;

Financial resources are to be provided in the form of grants and/or concessional loans.

2. Areas of Divergence

But the areas of divergence are still numerous and include:

- Whether the financial mechanism should act under the guidance or authority of the COP;
- The roles of the public and private sector in the financing of climate change under the UNFCCC;
- Whether the governance of financial resources should be exercised through bilateral, regional and multilateral channels in addition to some other authority under the Convention;
- Whether financial resources provided through bilateral, regional, and other multilateral channels or other institutions outside the Convention shall be regarded as fulfilment of the commitments by developed country Parties;
- Whether direct access by recipient countries should be possible, provided that the fiduciary standards of the in-country recipient country entities are effective;
- Whether there should be an Executive Body with the supporting structures to operationalize the financial mechanism under the full authority and guidance of the COP.

The purpose of the meeting at La Redoute was not to cover all of these issues, but to have a focused discussion on three crucial issues that are at the centre of the negotiations on the issue of finance, namely: the options for actual disbursement of funding to support climate change activities at the country level, the modalities for channelling funding streams in support of these activities, and the role of existing institutions in a final agreement. Many Parties believe that coming to a workable understanding and agreement on these three issues would significantly advance the negotiations on governance of finance.
The decision to focus on the these issues was arrived at after consultation with several Party delegations. This decision was based on the results of these consultations and on the analysis of convergence and divergence in the negotiations.

Key Areas of Concern to Most Parties

In less than five months, Parties to UNFCCC will be expected to come to a decision, among others, on the institutional arrangements that will govern the financial flows to support developing country action on climate change. The AWG-LCA now has a text from the Chair compiling the views and positions of Parties. This text, with the additions and modifications introduced in the August Bonn Inter-sessional Informal Consultation in Bonn, will be the basis of the next rounds of negotiations to take place in Bangkok and Barcelona prior to COP 15. Parties have had the chance to comment on and review the evolving negotiating text. Regarding financing, three areas in particular stand out as critical to the final agreement: 1) the options for actual disbursement of funding to support climate change activities at the country level, 2) the modalities for channelling funding streams in support of these activities, and 3) the role of existing institutions in a final agreement.

While being aware that the negotiations on the Financial Mechanism, its Architecture and Governance within the context of the UNFCCC encompass many other key issues, such as sources and levels of funding, burden sharing, and eligibility criteria to name just a few, the La Redoute meeting discussion centred on the three critical areas mentioned above. For each of these areas, the Moderator presented a short text laying out the main issues, an initial thesis, and some key assumptions under which the discussion could proceed. Following is the set of arguments that was presented to the participants for consideration for each of the areas.

I The Case for Devolution

Given the unprecedented level of international finance needed to address climate change in developing countries (both from private and public sectors), one of the key issue is whether it would be appropriate, desirable or even feasible to maintain the currently preferred system of funding decisions which are ‘retained’ – i.e. taken outside the target country, be it by bilateral or international agencies – – as opposed to ‘devolved’ to national decisionmaking.

In recent years, developed countries are opting more and more either for devolution in the form of ‘budget support’ or delegation, in the form of ‘specialized targeted trust funds’, to multilateral institutions. Should the new model be one that follows the principle of subsidiarity where decisions are devolved to ‘designated national funding entities’ in order to ensure that decisions on what gets funded are taken at the national level?

Devolution of funding decisions to countries responsible to take the actions has several advantages in addition to avoiding creeping transaction costs of growing multilateral bureaucratic structures. For one, it also ensures ‘buy-in’ and ‘ownership’ by countries over these decisions, consequently strengthening national commitment and mainstreaming of action into broader national and sectoral development strategies.

Devolution of funding furthermore has advantages related to capacity building for decision-making at the national level. Many countries will be encouraged (and assisted) to strengthen their decision-making capacity, which in turn facilitates and strengthens accountability and transparency. Fiduciary standards and accountability will always be critical and in some cases difficult given sovereign sensitivities. But given the agreements at Bali on MRV, this issue
could in the end be relatively easy to resolve with the right structures and mechanisms to make expectations quite clear and explicit.

2. The Case for Consolidation of (international) funding streams

International Climate Change Funding can be fragmented as is the norm today with several bilateral, multilateral and other channels; or it can be consolidated, collected in a multilateral streamlined ‘pass-through’ fund. This multilateral ‘pass-through’ fund would be managed by a Trustee. What resources countries would receive would be decided by a resource allocation system to be decided by the COP and would include rigorous criteria and formula. This streamlined system would be possible in a system of devolution argued above.

The Montreal Protocol regime provides some lessons. Under the Montreal Protocol, Parties obligated to provide funds to developing countries have the option to channel as much as 20% of the resources directly through their bilateral systems. Whether they have some flexibility or not, the issue is: should the system be largely consolidated – as in the case of the Montreal Protocol regime – or should funding for climate change remain as it is today, namely largely fragmented (albeit with an increased level of ‘coordination’)

The issue of the desired degree of consolidation is not only pertinent at the international, but also at the national level. In the proposal of the Reformed Financial Mechanism, the case is made for the need to create national funding hubs (‘designated national funding entities’), for consolidating funding streams that arrive in the country either from a consolidated fund or several funding streams and for making decisions on the disbursement of funds to support proposed activities (the case of devolution). Another alternative is to have a system where funds go directly to projects and programmes with the decisions taken elsewhere.

Consolidation at the national and the international level are independent of one another. However, to be totally consistent, devolution of decision making would work best under a system of national consolidation of international funding in ‘designated national funding entities’.

Internationally, the key issues that need to be addressed are the fairness of the ultimate resource regime (i.e. collection, allocation and disbursement), and the problem of ‘thematic balance’ – that is, trying to ensure that each of the themes to be funded (e.g. mitigation, REDD, adaptation, technology transfer, etc.) receive their fair share.

One of the key differences between ODA and international climate change funding under the UNFCCC is that the latter is not only compulsory for those who are meant to contribute, but that it has an element of entitlement on the part of the eligible recipients. In this context, it is therefore important that everybody who is meant to, contributes their fair share and everybody who is entitled to, receives their fair share.

3. The Case for Major Reform

The question that is in the mind of many is the degree of involvement of the UNFCCC regime in operating the allocation of internationally consolidated climate change funding. In this context, developing countries have made it clear through their submissions that operating entities must be ‘under the authority’ of the UNFCCC COP, which is minimally taken to mean that their Executive Bodies are to be selected (‘hired and fired’) by the COP. At present, neither the sole operating entity – Global Environment Facility (GEF) – nor international institutions funding climate change in developing countries are under the direct
authority of the COP in this sense. The GEF has a relationship with the COP that is guided by a MOU and an Annex, and maintains its own governance structure.

There are a number of functions which existing (and for that matter new) institutions could take in the context of international climate change funding. The focus here is on the function of being an operating entity, making decisions not only on allocation but also of disbursement.

4. Some other Related Issues

The issues of devolution and consolidation at the international level are mutually independent. Decisions can be retained abroad or devolved to the recipient, regardless of whether international funding is consolidated or fragmented.

This is slightly different in the case of national consolidation, for it is not easy to see how one could have genuine devolution of decisionmaking (to the national level) without some form of national consolidation.

Some of the potential functions of existing entities obviously do depend on the degree of consolidation. Thus, if there is no (international) consolidation, then there is no need for operating entities.

Discussion

The purpose of the La Redoute meeting was not to seek consensus but to have an open discussion on the concerns of Parties in each of the areas, to provide a glimpse at the issues of most interest to Parties, areas of possible convergence, and areas where there are still complex issues to resolve. The initial intention was to separate the discussion into the three blocks of issues. As the discussion got under way, it became quite evident that the three issues were so inter-related, that it was difficult to separate the discussion. Nevertheless, as much as possible, the summary below tries to separate and present the issues, impressions and views of the participants by area.

To guide the discussion, the Moderator suggested a set of questions. This set of questions is presented with the summary of the discussion in each of the areas:

1. Options for Disbursement

Some Key Questions:

a) What should be the decision-making model of international financial support for climate change action in developing countries? Should decisions on financial support be retained by bilateral and multilateral agencies? Or should decisions be devolved to the countries where the funds are used? Or is a combination of both the best option?

b) Are there types of financial support – such as for capacity building and technology transfer – which are more effectively and efficiently funded and retained at the international level?

c) If devolution of funding decisions is the preferred option, what are the circumstances or institutional arrangements that need to exist at the national level in order to make this option possible, feasible and viable? Against what reference instruments, if any – e.g. (thematic) national strategies, performance baselines or reference levels for the case of REDD – will funding be directed?
SUMMARY OF DISCUSSION

The discussion revolved around the following categories of issues and questions:

• **The definition of devolution**: Devolution as it is being proposed by the facilitators refers to a system of decision-making under rigorous standards and criteria for decisions on disbursement of funds in accordance with the principle of subsidiarity. This includes not just devolution of the decision-making for planning (as was the case in the NAPAs) but also on what programs are priorities for countries and which get funded. In other words, genuine devolution of decision-making is not possible without the provision of funds to allocate.

• **Does it have to be devolution vs centralized/retained decision-making or is there a spectrum of possible models?** Many felt that it would be necessary to examine the list of functions that are necessary to run the system properly and only then make decisions as to what gets devolved and what gets retained at the international level. Although most agreed with this proposition, the facilitators argued that while this is true in general, the decisions as to what should be funded should primarily be within the realm of the countries who, after all, know best their own priorities, capacities, and needs. It was mentioned by several participants that in the area of adaptation, for example, the problems and the solutions are very much locality-specific and it is inconceivable that decisions on it can be taken outside of the country in some international agency or operating entity.

• **Are devolution and international consolidation of funding mutual pre-requisites?** Does a devolved centralized system at the national level mean that funds have to come from only one place OR can this centralized national entity take funds from several sources including the private sector? While the facilitators argued that the system would be more efficient and effective if the two were working together, it was also concluded that an internationally fragmented system with various funding streams could still be consolidated at the national level.

• **Implications for Control and Oversight**: Devolution does not necessarily mean a loss of control – a concern of many developed countries when confronted with this proposal. Under a rigorous system of standards and oversight operating in a system under the COP (including NAMAs, MRV, registries and other metrics), it is difficult to conclude that such a system would not have checks and balances to ensure quality control and performance according to results.

• **Implications of a devolved model for global coherence and exchange of information for knowledge building**: Some areas, such as capacity building, knowledge sharing and technology development and transfer, were mentioned as being areas which could benefit from a retention of decision making at the international level under the Convention.

• **Implications of a devolved system on cost effectiveness**: A devolved system would press for national structures which are ultimately needed to manage a climate change effort in countries. These are institutions that are required anyway. The alternative of needing to strengthen the staffing and technical structures and thus the transaction costs of international organizations and operating entities to undertake these tasks should be a factor to be examined when comparing a devolved vs a retained system. In sum, a

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2 'the principle that a central authority should have a subsidiary function, performing only those tasks which cannot be performed effectively at a more immediate or local level'\[Oxford English Dictionary\]
devolved system would not only counteract the rise of transaction costs (that would grow in a retained system of decision-making) but also help to build capacities in countries as these are institutions that would need to be created and/or strengthened.

- **Will devolution affect the credibility of the system and the increase and flow of funds?**
  This issue also led to arguments for the need to build strong oversight and auditing systems as well as to adhere to rigorous standards and metrics for performance as per the agreements of the COP. A priori, there is no obvious reason to think that such a system (a devolved system) would suffer from credibility and trust.

2. **Modalities for Channelling Funding**

**SOME KEY QUESTIONS:**

a) Should the current ‘decentralized’ or fragmented system of funding be continued (albeit with ‘better coordination’) or is there a need to strive for a consolidated system? Or is there room for a combination of both?

b) Should committed funding be differentiated from other types of support (e.g. REDD-readiness support, capacity building, technology transfer support, etc)?

c) If consolidation is the preferred option, what are the elements of design that could make this option possible, effective, fair, and efficient?

d) What is the best way to ensure thematic balance amongst the diverse needs (mitigation, adaptation, capacity building, technology transfer, etc)?

e) How can we ensure that Parties who are entitled to funds get their fair share of the funding and those who are required to contribute shoulder their fair share of the burden?

**SUMMARY OF DISCUSSION:**

- **Definition:** ‘Consolidation’ is not the same as ‘centralization’. Consolidated funding, in other words, does not mean that all the decisions on allocation and disbursement are taken at some ‘central planning’ level. After all, the RFM proposal involves both an internationally consolidated ‘through put’ model which is decentralized through devolution funding decisions to the country level.

- **Consolidation and the fairness of a system of allocation:** Under a consolidated system it would be relatively easy to ensure an equitable sharing of the available resources: country allocations would be based on strict allocation criteria (approved by the COP), in the form either of disbursement formulae or on a performance basis. Several participants mentioned the need to have a formula in which all countries would get a minimum of resources and the rest according to a formula and strict criteria. The point was made that ensuring not only a balanced but fair financing under a ‘coordination’ model might be rather more difficult, particularly if the coordination is not binding.

- **The role of an international consolidated fund:** Under a system of a consolidated fund, the activities regarding technical advice and assistance to countries, as for example, for developing national strategies and plans, would be placed elsewhere (in the RFM proposal of the facilitators, this task is left to the thematic assessment units). Other roles such as tracking of contributions by Parties in meeting their obligations under the Convention would also be primarily done elsewhere, namely at the receiving end by the national designated funding entities.
• **Should a consolidated fund be the only option offered to Parties?** Several mentioned that there would be many who would ask for this flexibility, including to channel through existing institutions that have build a large body of work and experience in the areas of mitigation, REDD, adaptation and technology. One participant felt that a middle option would be best with safeguards for coordination, coherence and adherence to COP decisions.

• **Implications of an international consolidated fund for speed and efficiency:** As mentioned in the definition, the decisions on allocation and disbursement are not made by the trustee but by other bodies that would need to be created within the UNFCCC regardless of whether there is a consolidated fund or not. The speed and efficiency is to be measured there and not in the consolidated fund.

• **Implications of a consolidated fund for reporting:** The new system for funding for developing countries to be established by COP 15 will be one of obligation rather than voluntary action as it is at present. As such, there will be a need to establish entities for certifying and registering support that is meant to count against financial obligations. The type of reporting under the consolidated fund is the tracking of the funds placed, the funds allocated, and the programs funded. It will be complementary to reporting by others under the COP. Several participants argued that many international systems have a wealth of experience in these areas which should be used.

3 **The Potential Role of Existing and New Institutions**

**SOME KEY QUESTIONS**

a) *Is there a need for new institutions? And if yes, what if any would be the role of existing ones?*

b) *What would be required to make existing institutions fit for purpose and tasks that they may be assigned?*

c) *What would be the role of the COP in the allocation of resources, and its relationship to any operating entity, either consolidated or not?*

**SUMMARY OF DISCUSSION**

• **Does devolution and consolidation of funding mean no role for existing institutions?** The conclusion was that there are so many functions and tasks that need to be performed, that there will indeed be many possible roles for existing institutions. For some, the role could even be one of becoming an operating entity of the UNFCCC. The role of being an international organization will continue to be extremely important in the implementation, the support for implementation, and in capacity building (including in helping countries establish national entities and systems to perform key functions such as MRV, baselines, reference emissions, levels, registries, etc.), and other tasks that could be outsourced.

• **What is logic and justification for the G77 and China proposal?** For a number of years, developing countries have been dissatisfied with the slow and inadequate response vis-à-vis the immense needs of the present arrangements. These range from issues related to governance and relationship to the COP to others regarding the mobilization of resources (at present on a voluntary basis), the allocation of resources and the disbursement. The proposal of the G77 and China calls for a complete overhaul of the system based on this negative assessment.
• **Is a system of allocation of resources on a predictable manner possible?** All the participants agreed on the automaticity of the funding. Some however suggested that a system of safeguards was necessary to account for a lack of performance, and in some cases, even a failure of governance in the country. The response from some, particularly developing countries, was that there was a need to think of a paradigm shift of transfer of resources when it comes to climate change. ODA has certain parameters for allocation of resources which should not, under any circumstance, apply to climate change funding where predictability and the possibility of linking to concrete metrics of performance was possible. The establishment of a designated national entities, each to suit the needs of each country, to coordinate and be responsible for these tasks would improve the chances of success and links between funding and performance.

• **Are there good experiences oversight and performance monitoring?** In addition to the systems agreed at Bali for the Bali Action Plan (MRV), there would need to be systems in place not only to carry out functions of external monitoring and evaluation but also auditing. There are many experiences, including those of international organizations, NGOs, and UN Agencies, from which standards could be copied and lessons learned. Experience and history has taught us that although it is not possible to always guarantee a perfect flawless world, there are indeed many ways to mitigate and avoid risks. Countries from around the world already have systems in place not only for the management of their national budgets but also for ODA, loans and investments. All of these have established precedents and experience that can be used quickly and readily.

• **What will existing institutions need to do to improve the chances of being assigned large potential roles in the post 2012 regime?** Again, many felt that it would be helpful to have a change of the relationship and paradigm of resource transfer when it comes to climate change funding. In the case of climate change, it is not a donor and recipient relationship, that is, one set on voluntary or unilateral standards, but to be set as part of the legal agreement – the Convention. A relationship based on these principles would facilitate establishing trust and credibility: the basis of performance on both sides is mutual. At present, many participants felt that this is not the case with some international organizations. One participant felt that rather that simply walk away from these institutions (that are owned by governments), an effort should be made to make them work within the new paradigm of climate change funding. In the case of some of these agencies, using them would also improve the chances of linking development, development finance and climate change. The G77 and China proposal is based on the notion that this would be difficult if not impossible because of the governance and power structures existing within these institutions.
Appendices:

A.1: List of Participants

Quamrul Islam Chowdhury, Bangladesh
Jozef Buys, Belgium
He Zheng, China
Zhu Liucai, China
Juergen Lefeve, European Commission
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Anders Wijkman, Sweden
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Siobhan Stanger, UK
Alice Kehoe, UK
Hannah Ryder, UK
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Izabela Juszko, ecbi
Hannah Reid, ecbi
Luis Gomez-Echeverri, ecbi
Saleemul Huq, ecbi
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A.2: Publications³

Müller, B (June 2009) ‘Are Treasuries killing the climate deal?’ Oxford Energy and Environment Comment

³ Available at http://www.oxfordclimatepolicy.org/publications/mueller.html