

# Community access to the Loss and Damage Fund Insights from the frontline in Bangladesh

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**Cover:** A male sitting in front of his house in a river erosion hit village in Kurigram District. Often coupled with floods, river erosion – a slow-onset disaster – eats away lands across Bangladesh. Located along the Jamuna River, Kurigram’s thousands of people are at risk of loss of territory, livelihoods, and displacement. Photo credit: Gana Unnayan Kendra (GUK)

Photographs: p18, Nushrat Rahman Chowdhury; p25, Nowabbenki Gonomukhi Foundation (NGF).

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## List of acronyms

AF	Adaptation Fund
CMA	Conference of the Parties serving as the Meeting of the Parties to the Paris Agreement
COP	Conference of the Parties
CSO	civil society organisations
EDA	enhanced direct access
FIF	Financial Intermediary Fund
GCF	Green Climate Fund
GDP	gross domestic product
GEF	Global Environment Facility
IIED	International Institute for Environment and Development
LDF	Loss and Damage Fund
MoDMR	Ministry of Disaster Management and Relief
NGO	non-governmental organisation
SNLD	Santiago Network on Loss and Damage
UN	United Nations
UNFCCC	United Nations Framework Convention on Climate Change

## Executive summary

In 2023 at the United Nations Framework Convention on Climate Change 28th Conference of the Parties (COP28), the Conference of the Parties (COP) and the Conference of the Parties serving as the Meeting of the Parties to the Paris Agreement (CMA) operationalised the Loss and Damage Fund. The Fund's mandate includes addressing loss and damage to assist developing countries vulnerable to climate change.

One of the functions of the Loss and Damage Fund (LDF) Board is to develop various modalities to facilitate access to the Fund's resources. These modalities may include "Access to small grants that support communities, Indigenous Peoples and vulnerable groups, and their livelihoods, including with respect to recovery after climate-related events."<sup>1</sup>

This report sets out recommendations for addressing barriers that may be faced by communities and civil society organisations in directly accessing small grants from the LDF to support frontline people (i.e., communities, vulnerable groups and Indigenous Peoples). We conducted seven key informant interviews with participants working with government organisations, non-governmental organisations (NGO), academia, thinktanks and civil society organisations (CSO) in Bangladesh to develop these recommendations.

The report discusses the significance and added value of this particular access option, offering insights from a national-level perspective to inform LDF Board decisions. It discusses issues such as country and community readiness to make use of this option, highlights support on the ground that might be needed (from local CSOs, CBOs, sub-national governments, national government), and sheds light on foreseen challenges and lessons learned.

The policy actions suggested in this report will help frontline people to unlock funds and utilise the finance themselves to respond to the climate-associated economic and non-economic losses and damages they are experiencing, from both extreme weather events and slow-onset events, in the context of ongoing and ex-post (including rehabilitation, recovery and reconstruction) actions.

## Recommendations

The Loss and Damage Fund Board must:

- Take into consideration the status quo, challenges, needs and priorities of frontline people (i.e. communities, vulnerable groups and Indigenous Peoples) when developing finance access modalities.
- Further clarify which communities and vulnerable groups are eligible to apply for and receive small grants.
- Adopt a simplified accreditation process to provide small grants to frontline people directly, or via national entities when direct access isn't available; it should also set indicators to evaluate the performance of its small grants modality.
- Help strengthen technical capacity and resourcing of frontline people so they are able to comply with streamlined policies and procedures, safeguards and fiduciary standards.
- Extend its support, including financial, to frontline people and their organisations to enable them to represent themselves at LDF meetings and proceedings.
- Alongside respective national governments, provide technical and financial support to prepare frontline people to access LDF's small grants and use them to respond to economic and non-economic losses and damages generated by sudden and slow-onset climate-related events.
- Learning from the existing climate funds, develop modalities that ensure adequate finance reaches climate-impacted communities and vulnerable groups quickly.

## The LDF – the newest UNFCCC fund for responding to climate change

The Loss and Damage Fund (LDF),<sup>2</sup> a new channel for multilateral finance, was created to help ‘developing countries’ respond to economic and non-economic loss and damage from the adverse effects of climate change.<sup>3</sup> The LDF adds to the United Nations Framework Convention on Climate Change (UNFCCC)’s existing entities of climate financing, the Green Climate Fund (GCF) and Adaptation Fund (AF), and will not be used for mitigation or for pure adaptation projects. Instead, it will be used to address climate change-associated impacts to lives, livelihoods and the future of communities in developing countries.<sup>4</sup> ‘Developed countries’ are ‘urged’ to provide support, on a voluntary basis, to address loss and damage interventions.<sup>5</sup>

Given the urgent and immediate need for new, additional, predictable and adequate financial resources to help developing countries respond to loss and damage, countries at the 27th Conference of the Parties (COP27) decided to establish a dedicated fund – the LDF – in the context of new funding arrangements, and established a ‘transitional committee’ to make recommendations on ways to operationalise the LDF and the funding arrangements at COP28 in 2023. The historic agreement to operationalise the LDF was completed at COP28 as part of wider arrangements responding to loss and damage. All the arrangements to have the LDF up and running are to be approved by COP29 in November 2024.

The LDF is accountable to and functions under the guidance of the Conference of the Parties (COP), which serves as the meeting of the Parties to the Paris Agreement (CMA). As per COP and CMA decisions, the Fund will be set up as a Financial Intermediary Fund (FIF) of the World Bank. The World Bank will provide trustee services and host the LDF’s secretariat, provided it can show it meets a set of 11 conditions.<sup>6</sup> The LDF Board, comprising 26 members (14 from developing countries and 12 from developed countries), will govern and supervise the Fund.<sup>7</sup>

The LDF will provide support for individuals, communities and countries impacted by both extreme weather events and slow-onset ones. It may include funding that complements humanitarian actions taken right after an extreme weather event strikes.<sup>8</sup> Following that, funding will be available for both intermediate and long-term recovery, reconstruction or rehabilitation-related programmes, projects and interventions. The Santiago Network on Loss and Damage (SNLD), the



mechanism of the UNFCCC that provides technical assistance to address climate risks, is expected to support the LDF in building capacity and programmatic approaches under the Fund.<sup>9</sup>

## Funding the LDF

The LDF will be funded by developed countries on a voluntary basis. Taking the UK as an example of a 'developed' country, Christian Aid's *The Loss and Damage Fund: Where does the money come from?* report shows how potential revenue sources including general progressive taxation could generate the country's fair share to contribute to the Loss and Damage Fund.<sup>10</sup> However, the hard-and-long-fought LDF hasn't met expectations. It has been labelled by some as a 'flawed' agreement given that contributions are voluntary,<sup>11</sup> undermining the UNFCCC and the Paris Agreement principles. Only \$661.39 million dollars has been pledged so far, a significant portion of which (around \$200 million dollars) will be used to operationalise it. The existing pledges fall far short of what is needed to address loss and damage in vulnerable countries – the estimated economic loss and damage is \$671 billion annually in the 2030s in developing countries alone<sup>12</sup> so the fund represents 0.1% of what is needed.

## The economic context of developing countries experiencing loss and damage

The LDF will provide financing in grants and highly concessional loans based on its Board's policy.<sup>13</sup> It may also deploy a range of other financial instruments that take into consideration the debt sustainability of the recipient country, to augment and complement national resources for addressing loss and damage).<sup>14</sup>

Many countries become stuck in an unsustainable debt trap because of intense and frequent weather events, such as cyclones and floods. Individuals and communities in poorer countries tend to have lower resilience than people living in richer countries due to factors such as smaller assets, limited public services and fewer means to withstand climate impacts, and so end up experiencing more losses and damages. Debt-creating instruments, including loans for loss and damage funding, have trapped developing countries in crisis as they have to keep repaying their debts even when their economies have been severely damaged. This is fundamentally unjust.<sup>15</sup>

Least Developed Countries (LDCs) and Small Island Developing States (SIDS) take on additional loans on top of their pre-

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existing debt to get their economies back on their feet every time a disaster strikes. Vanuatu, which is a carbon-negative country, increased its debt to 44% in 2018 after battling with a series of cyclones.<sup>16-17</sup> Zambia is due to spend over four times more on debt payments than on addressing climate impacts in the next decade unless debt relief or cancellation is agreed.<sup>18</sup>

Currently, initial support for climate-related emergencies comes through humanitarian channels and multilateral and bilateral donors, or from outside of climate finance, including in the form of cash and in-kind support such as temporary shelter, food and basic life support.<sup>19</sup> Following an extreme weather event, developing countries commonly have to borrow to provide additional emergency relief to affected communities and to finance recovery and reconstruction interventions, resorting to debt instruments such as loans, bonds and budget reallocations.<sup>20</sup> However, a significant portion of the loss and damage response cost is also borne by climate-impacted individuals and communities themselves, who have little means to pay.<sup>21</sup>

The 2022 Pakistan Floods caused \$14.9 billion in damages and \$15.2 billion in economic losses – mainly borne by its 33 million people.<sup>22</sup> These ‘biblical floods’ left families without an income source and with little or no access to the most basic amenities of life.<sup>23</sup> About 90% of over \$10 billion pledges to support flood-hit Pakistan were project loans that will be rolled out over the following three years. Pakistan, the eighth most climate vulnerable country in the world, is responsible for less than 1% of global carbon emissions.<sup>24</sup>

Battered by three cyclones in 2022 and 2023, Cyclones Ana, Gombe and Freddy, many people of Chikwawa District of south-western Malawi decided to relocate after their half-reconstructed homes were washed away. Individual and community efforts and resources to rebuild their lives and livelihoods are wasted repeatedly as disasters become more frequent.

Research by International Institute for Environment and Development (IIED) in 2019<sup>25</sup> found that households in Bangladesh in 2015 spent an estimated \$2 billion dollars on disaster preparedness and response – this was more than double the government’s spending and over 12 times more than multilateral international financing for the country’s rural population in absolute terms. IIED also found that, in absolute terms, both female- and male-headed rural households spend similar amounts to avert, minimise and address loss and damage. However, as women have a much lower average income than men, they end up spending more as a share of

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income, meaning that climate-related events have a bigger effect on female-headed rural households.

While countries do currently receive some support for loss and damage due to extreme weather events, both slow-onset events and non-economic loss and damage experienced by individuals and communities are poorly addressed and remain outside of the scope of most existing climate funds.<sup>26</sup> The LDF, however, will finance actions to address slow-onset events. The LDF will also support climate-vulnerable developing countries to develop their national response plan, addressing insufficient climate information data and climate-related emergency issues, promoting equitable, safe and dignified human mobility in the form of migration, relocation and displacement in the context of temporary and permanent loss and damage.<sup>27</sup>

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## Access modalities for the LDF

### Is direct access possible from a Financial Intermediary Fund of the World Bank?

The LDF is mandated by the COP and CMA to provide access to communities through small grants in alignment with the LDF Board's policies and procedures, which will be established as part of the operationalisation of the Fund. As the Fund is a FIF of the World Bank, it is up to the World Bank to confirm that it can meet these conditions including allowing developing country governments and organisations working with climate-vulnerable populations to receive money directly from the Fund without going through multilateral development banks and UN agencies.<sup>28</sup>

Direct access has been one of the most contentious issues in operationalising the Fund. Direct access via non-traditional implementing entities goes beyond the existing hosting practice and management framework of the World Bank's FIFs. The World Bank usually disburses funds via intermediaries such as multinational development banks and UN agencies.<sup>29,30</sup> This way of channelling funds is prevalent in climate finance but isn't suitable for local communities to access the finance easily and utilise it themselves.<sup>31</sup> However, channelling multilateral climate finance from international funds through direct access has been limited to date and it is too early to see whether such models are promoting local ownership, with many national and subnational entities finding it very difficult to comply with stringent accreditation standards due to lack of capacity.<sup>32</sup>

The World Bank has been invited to operationalise the Fund on the premise that it can quickly channel funds to the communities affected by loss and damage. This is despite the

fact that it is an entity dominated by high-income countries (who are its biggest stakeholders) in which the Global South has limited voice and participation. It also has a poor track record on community engagement.<sup>33</sup> The World Bank stresses that their FIF trusteeship does not involve overseeing or supervising the utilisation of the funds implying that the LDF Board will have authority to make decisions on funding allocations for specific activities.<sup>34</sup> Therefore, the LDF Board needs to use that authority to develop access modalities grounded in reality, and acknowledging the current situation, limitations and challenges of communities and vulnerable groups in accessing financial resources from sub-national, national and regional entities.

### **Access modalities matching with frontline communities and vulnerable groups' priorities and needs**

Looking ahead, the LDF Board must ensure that the Fund becomes operational as early as possible to fulfil its mandate to support communities and countries in responding to climate loss and damage. Its task includes preparing a long-term fundraising and resource mobilisation strategy for new, additional, predictable and adequate financial resources from all funding sources.<sup>35</sup>

In 2022, alongside partners, Christian Aid put forward six overarching principles to guide loss and damage finance in line with a climate justice-oriented approach in the *Loss and Damage Finance Facility: Why and How* discussion paper.<sup>36</sup> These principles address the existing challenges in the climate finance architecture including finance often not reaching the communities in need, stringent accreditation requirements and long delays in finance reaching the most marginalised climate-impacted communities. With climate justice at the core of decision making, the principles recommend that loss and damage finance mobilisation should be guided by local communities experiencing losses and damages. There will not be climate justice if communities in the global South can't access sufficient funds to address the loss and damage they experience. This is also reflected in the principles of equity and common but different responsibilities and respective capacities (CBDR-RC).<sup>37</sup>

The LDF Board must ensure that the capitalisation and replenishment of the Fund at the global level, with new, additional, predictable and adequate financial resources, matches the priorities and needs of the communities on the frontline of the climate crisis – the scale of the needs is in the hundreds of billions of dollars.<sup>38</sup> It is important that the Fund is capitalised and replenished as soon as it is fully operationalised so that

communities don't have to wait for support. It is also important that the allocated finance does in fact reach its intended destination – communities and vulnerable groups in developing countries. Vulnerable populations continue to be disproportionately impacted by increasing and frequent loss and damage events as climate change worsens – 2023 was the hottest year on record. Heatwaves, floods, droughts, wildfires, and rapidly intensifying cyclones inflicted misery and mayhem for millions and caused many billions of dollars in economic losses.<sup>39</sup>

Equally, communities in climate-vulnerable countries need to be able to access finance from the Fund to address their increasing needs, which they are trying to meet now with their own resources. Countries such as Bangladesh are already spending 6–7% of their annual budget on adapting to climate change, of which 75% comes from domestic sources.<sup>40</sup> Bangladesh budgeted 5,000 crore taka (around \$456 million) for 'Funds to deal with economic and natural shocks' under its Social Security Programs for the fiscal year of 2023–24.<sup>41</sup> The fund was created for day labours, farmers, labourers, domestic workers and victims affected by natural calamities such as floods, untimely floods, storms, hailstorms and cyclones.

Bangladesh is a member of the V20, a forum of climate-vulnerable countries. The forum reported that climate change has wiped out one fifth of the wealth of V20 countries over the last two decades. Communities in the V20 countries are already allocating a large amount of their resources to cover rapidly growing climate losses and damages resulting in lesser budgets for their education, public health and other basic needs.<sup>42</sup>

### **Access modalities grounded in climate justice principles**

One of the overarching principles Christian Aid and its partners put forward is to provide public and grant-based loss and damage finance. The LDF decision text partially reflects this – the Fund is mandated to provide finance in the form of grants and highly concessional loans based on the Board's policy and procedures.<sup>43</sup> In detailing how the Fund's contribution will reach frontline communities, Christian Aid and its partners suggested that the Fund Board should design a deliberate process in which developing countries and sub-national/local stakeholders, including affected communities, are equitably represented and these entities receive the support they deserve for responding to loss and damage.

Simply put,<sup>44</sup> the Fund needs to be grounded in climate justice principles<sup>45</sup> as loss and damage is underpinned by deep injustice – it is poorer communities in developing countries who

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are being disproportionately impacted by climate crisis despite having least responsibility for causing it.

IIED (2017)<sup>46</sup> estimated, based on their interrogation of the Climate Funds Update database<sup>47</sup>, that out of the \$17.4 billion total of international climate finance, \$1.5 billion was approved for locally focused climate projects between 2003 and 2016; less than 10% of climate finance was directed towards the local level. The existing tracking structures do not follow the money beyond national level<sup>48</sup> making it very difficult to understand and measure to what extent communities, Indigenous Peoples and vulnerable groups have been able to receive financial support commensurate with their level of needs and priorities. In the absence of simpler, more accessible and user-friendly (using learning from existing climate funds) access modalities, these people are likely to miss out on the opportunities provided by the LDF. While the Fund is mandated to support communities, Indigenous Peoples and vulnerable groups and their livelihoods, including with respect to recovery after climate-related events, through enabling 'access to small grants', it is not clear how the finance will be distributed to these stakeholders and how these stakeholders will be able to access the Fund's resources when needed.

In an ICCCAD (2024)<sup>49</sup> report on climate change impacts in Bangladesh, the authors shared the same concern: the pledges made during COP28 aren't clear on how the money will be distributed, and it is possible that the funds will not reach the communities who are at the forefront of the ongoing climate crisis. The authors are also alarmed that the pledges will add to vulnerable countries' already substantial debt burdens when support is not provided in the form of grants. This is one of the contentious discussions the LDF needs to engage in – whether a share of support should be provided as concessional loans rather than simple grants.<sup>50</sup> To realise justice for the most vulnerable, Christian Aid has been advocating for more public finance in the form of grants rather than loans. This is especially important for the LDF because it is about rich countries who have caused losses and damages paying those experiencing their effects.

Some modalities including direct access, international access and rapid disbursement modalities are specified in the decision text to facilitate access to the Fund's resources.<sup>51</sup> One task of the LDF Board is to further detail these elements to unlock finance for communities, Indigenous Peoples and vulnerable groups to respond to loss and damage. In doing so, the LDF Board must address the barriers preventing communities and their groups from accessing financial resources.

While the Fund is mandated to support communities, Indigenous Peoples and vulnerable groups and their livelihoods, it is not clear how the finance will be distributed to these stakeholders and how these stakeholders will be able to access the Fund's resources when needed.

## Enhanced direct modalities as a way to allow access and strengthen local actors' voices

Christian Aid and its partners have been advocating for simplified access to the Fund, allowing for both international access (through international entities such as the UN Environment Programme) and direct access (through regional, national and sub-national entities) as needed and requested by recipient countries.

However, they are strongly advocating for direct access to be prioritised as far as possible. To ensure climate finance reaches the local level so that communities, Indigenous Peoples and vulnerable groups are equipped to save their livelihoods, the Fund should offer enhanced direct access (EDA) modalities to the sub-national and local levels for specific activities, supported by a national authority or national focal point (for example utilising existing structures, such as national implementing entities already accredited with the AF or GCF). This would allow affected communities and disproportionately impacted population to access small grants while strengthening the voices of local actors.

An SEI report (2022)<sup>92</sup> recommends prioritising simplified and enhanced access procedures that deliver funding directly to communities and marginalised groups. It emphasises that EDA would enable nominated national entities to undertake a much-needed programmatic approach to climate finance with devolved decision making at the national level that addresses local actors' needs, priorities and challenges. The authors suggest that this could prompt the shift of climate finance towards practices better aligned with climate justice principles. In operationalising the Fund, the UN Development Programme Global Environment Facility (GEF) Small Grants Programme and the Dedicated Grant Mechanism of the Climate Investment Funds' Forest Investment Program were identified as inspiring initiatives in establishing local-level access to finance, which can also be in combination with enhanced direct access modalities.

However, the authors of the report also recommend learning from the experiences of existing models. First, the conditions for EDA in the GCF and AF that projects must be approved by the national government raise concerns of potential conflict of interest between national and local actors and marginalised communities if these actors are in a difficult relationship. Second, devolving decision making may not generate the expected positive outcome, but instead may shift power struggles, conflict of interests and injustice to a lower level. Third, communities need to have freedom to choose options – if communities don't want to manage funds, then national and local governments, independent organisations or local NGOs could take the role of an intermediary fund manager.

The LDF Board must address the barriers preventing communities and their groups from accessing financial resources.

The financing instrument recommended most highly in the SEI report was small grants or direct cash transfers through cash handouts and direct transactions. The report was informed by the priorities and needs of focus group participants who were from different parts of the world, and had different types of experience in governments, civil society organisations and NGOs. Some of these participants advocated for there to be direct access to the Fund with appropriate safeguarding measures in place rather than communities having to go through a national-level response to access finance. They argued that they have already been working with vulnerable populations for years and they want the Fund to provide technical support to local entities to build their capacities to receive and manage funding.

## **Insights from the frontline communities in Bangladesh**

It is important to note that the feasibility of devolution will vary from country to country. Each country needs to have tools to effectively navigate and maximise its access to available funding opportunities in the global financial landscape<sup>53</sup> and once the financial resources are acquired, the country needs to disburse the finance from national to local level, supporting local beneficiaries to address and respond to loss and damage.<sup>54</sup> This section examines the main challenges that may be faced by the climate frontline communities and vulnerable groups in Bangladesh in accessing small grants from the LDF and offers recommendations to inform LDF Board members, national policy makers and UNFCCC negotiators as they prepare to firm up access modalities to the LDF.

### **Bangladesh's leadership in making the LDF a reality**

Having led the Climate Vulnerable Forum twice, Bangladesh played a strong role in establishing and operationalising the Loss and Damage Fund at COP28 in 2023. Bangladesh has been one of the frontline developing countries advocating for loss and damage funding for years and its leadership has always been very strong in demanding adequate financial support on the basis of justice.<sup>55</sup> The country is vulnerable to both disasters and climate change and is ranked seventh among the countries most affected by changing climate from 2000–2019. Climate-related disasters including increased sea levels, salinity intrusion, and frequent and intense floods and cyclones are posing threats to its development gains.<sup>56</sup>



## Loss and Damage status quo

The observed climate impacts are negatively impacting lives and livelihoods of people and communities in Bangladesh. On average, cyclones cost Bangladesh about \$1 billion annually, and its gross domestic product (GDP) could fall by as much as 9% due to severe flooding.<sup>57</sup> The changing climate will hit poor and vulnerable people the hardest; a third of Bangladesh's agricultural GDP could be lost and 13 million people could become internal climate migrants by 2050 due to climate change. Climate disasters will have both severe human and huge economic consequences for Bangladesh.

Bangladesh incurred losses of approximately \$11.3 billion in 2021 – around 2.47% of its GDP for the year of 2021–2022.<sup>58</sup> On average, Bangladesh loses around \$3 billion, or 1–2% of its GDP to climate disasters annually – but in certain years these figures can be higher.<sup>59</sup> To deal with increasing climate risks, the country is consistently allocating resources and formulating policies, procedures and strategies. As a result, loss of life and physical injuries from extreme climate events have decreased significantly over time.<sup>60</sup> However, as climate impacts are increasing at an alarming rate in Bangladesh, current measures or safeguards will not be enough to protect its people and their livelihoods. The greater the rise in emissions, the higher the likelihood of impacts exceeding both households' and the government's ability to respond to the ongoing climate crisis.<sup>61</sup>

Within the UNFCCC context, Bangladesh has experience of accessing climate finance from both the GEF and GCF. The GCF is the main global vehicle for disbursing finance from developed countries to poorer developing countries. Though Bangladesh has been able to access some funding from the GCF through multilateral organisations, it has rarely been able to access direct funding through government institutions. One of the main obstacles to direct access has been an inability to fulfil the GCF's conditions and getting Funded Activity Agreement (FAA) approval and accreditation often requires a lot of effort and time.<sup>62</sup> Bangladesh has been demanding that the GCF reconsider its conditions for accessing funds by considering the existing financial management system and process and the practical experience of countries such as Bangladesh in implementing projects under this.<sup>63</sup>

Against this backdrop, Bangladesh needs to prepare itself to access the newest climate fund – the LDF – which is expected to be the main source of international climate finance to help climate-impacted communities and countries rebuild their lives and livelihoods. Small grants are one of the modalities through which communities and vulnerable groups from Bangladesh and other developing countries can access the Fund. However,

The changing climate will hit poor and vulnerable people the hardest; a third of Bangladesh's agricultural GDP could be lost and 13 million people could become internal climate migrants by 2050 due to climate change.

these groups will only be allowed access to the small grants if they comply with policies, procedures, safeguards and fiduciary standards set by the Board of the Fund.

**Below:** The Manta – one of the oldest fishing communities in Bangladesh – finding it difficult to earn their livelihoods in scorching heat, frequent, intense, and unpredictable rain and storms.



Almost all participants shared the same concern that frontline communities and vulnerable groups do not know about or have not yet received information on the Fund.

## Insights from new research in Bangladesh

We conducted seven key informant interviews with participants working with government organisations, non-government organisations (NGOs), academia, thinktanks and civil society organisations (CSOs) in Bangladesh. From these interviews we developed recommendations to address the barriers we foresee communities and vulnerable groups in Bangladesh facing in directly accessing small grant funding from the LDF. The discussion was broadly structured around questions including the extent to which the newly operationalised LDF can support frontline communities in Bangladesh, potential barriers to access the Fund and how those can be addressed (a list of questions is included in Annex A).

### Key challenges at local level to access loss and damage finance

Below is an overview of potential barriers that communities and vulnerable groups in Bangladesh may face in accessing LDF finance.

#### Lack of awareness on the decision to operationalise the LDF among the communities and vulnerable groups

Almost all the participants shared the same concern that frontline communities and vulnerable groups do not know about or have not yet received information on the Fund. Some information is available at the district level, mainly from the

monthly GO (government organisation)-NGO coordination meetings. However, this information is unlikely to reach local levels – as there is no system to channel the information to the ward level. LDF-related information is mostly available among participants working in academia, thinktanks, and CSOs and NGOs operating at the national and international level.

### **No previous experience of accessing climate funds by communities**

For communities and vulnerable groups in Bangladesh, this would be the first time ever that they are given the opportunity to access an international climate fund. Almost all the participants pointed out the constraints faced by community-based and community-led groups – including lack of quality education, project design skills and management skills, and lack of financial resources – which may make it difficult for them to access finance from the LDF. However, communities and vulnerable groups have long been part of government and non-government disaster and climate-related projects including emergency response, relief, rehabilitation and disaster risk reduction interventions, which have helped them to build some related skills including identifying disaster risk in their communities and conducting rapid loss and damage assessment after floods and cyclones occur. Participants working with NGOs shared that many of their projects are designed and implemented in coordination with communities and different vulnerable groups.

### **Limited understanding of loss and damage among stakeholders**

Across all the participants, the main concern was that climate-induced losses and damages are yet to be adequately assessed. There is a lack of data, and it remains a challenge to collect and preserve evidence and utilise it properly. The existing mechanism to make an initial estimate of the economic costs of major disasters is the D-Form, led by Ministry of Disaster Management and Relief (MoDMR), but this doesn't fully capture the total costs as the assessment is conducted within two or maximum three weeks after a disaster strikes. And although economic costs are estimated for major disasters to a significant extent, there is much less understanding and realisation of non-economic loss and damage experienced at the individual, community and environment level.

'We don't know how to know assess and put a price tag on the grief of a mother who lost her baby to a cyclone or the grief of a son who had to leave his father's dead body in the floodwater as there was no place to bury it. The dead body was denied a decent a burial. In such cases, we feel powerless.'

Shahinur Rahman, Koyra, Khulna

Small, localised disasters such as tornadoes, hailstorms and excessive rainfall aren't assessed in most cases, leaving extensive losses and damages unaddressed at the local level. Some participants raised concerns about the environment being damaged significantly depending on the severity of the disasters. Some participants also affirmed that loss and damage is experienced differently by people within a community – farmers, fishers, women and children are likely to experience it differently. Their coping strategies in the short and long term also differ accordingly (see Box 1).

### **Potential barriers from the Fund's eligibility criteria and accreditation process**

Some of the participants felt the need to have further detailed discussions with the LDF Board about the possibility of accessing small grants that support communities, Indigenous Peoples and vulnerable groups and their livelihoods, including recovery interventions. They especially wanted more information on which groups are considered to be communities and vulnerable groups. Different types of community groups – including community-based or community-led organisations, youth-led organisations, women-led organisations, and clubs – are working in communities supporting them during, before and after disasters in addition to doing social work throughout the year. In many cases, these local entities, formal and informal, are technically and financially supported by NGOs and CSOs that are implementing disaster, climate and resilience-building projects. Some participants would like to access finance directly from the Fund instead of going through the national entity. They suggested this would enable them to provide quicker responses at the community level.

## **Box 1: Climate Change Adaptation and Sustainable Energy (CCASE) programme**

Christian Aid Bangladesh is implementing a project 'Understanding and mitigating non-economic loss and damage' from 2023 in vulnerable slums of Barishal City Corporation, Patuakhali Municipality, Rowmari and Rajibpur Upazilas (sub-district) of Kurigram District and Bishwambarpur and Tahirpur Upazilas (sub-district) of Sunamganj District. The project has two key components: (a) understanding what non-economic loss and damage is and how this can be addressed, and (b) supporting some of the non-economic loss and damage through programming. The programme and research partners are the Association of Voluntary Actions for Society (AVAS) and the International Centre for Climate Change and Development (ICCCAD), respectively. A similar non-economic loss and damage project is also being undertaken in Malawi. Both fall under Christian Aid's flagship programme – Climate Change Adaptation and Sustainable Energy (CCASE).

‘From our experience with communities on fund access [a Christian Aid intervention that allocated a fund for community-led response as a part of its localisation commitment], we realised the implementing communities are more empowered when they are both decision makers and implementors.

Also, this was the first time these communities were engaged in responding to a fund call, accessing the finance, implementing the schemes and reporting back. We supported them throughout the process.’

Shah Elias, Nowabenki Gonomukhi Foundation (NGF)

## **Actions needed to address the challenges**

### **Country level**

- Most participants recommended that there be a dedicated and comprehensive mechanism established for loss and damage finance issues connecting related stakeholders including communities, Indigenous Peoples and vulnerable groups from national to local level, at least up to union level (which is the lowest tier of local government bodies in Bangladesh). Some participants shared that the Ministry of Environment, Forest and Climate Change, the UNFCCC focal point for Bangladesh, is considering launching a short-term loss and damage readiness programme allocating finance from its own Bangladesh Climate Change Trust Fund (there has been no official announcement yet). Establishing such a mechanism could be part of that readiness initiative.
- Part of this mechanism should establish ways in which communities and vulnerable groups will be able to access the LDF simply and quickly. Finance access modalities developed at the national level could be one of the ways to achieve this. If that happens, all the participants

emphasised that there must be community participation and engagement in this process.

- All the participants raised the need to strengthen communities' and vulnerable groups' human and institutional capacities so that they are at least able to take part in the LDF discussions and design and implement projects with full authority of the LDF. Some participants mentioned NGOs' and academia's support in this regard since they often offer capacity building training to their stakeholders (see Box 2).
- Participants who were aware of the SNLD saw its role as delivering technical assistance, knowledge and resources at least up to union parishod level. They argued that the Network needs to be functional as early as possible; both technical and financial support is urgently needed among the climate frontline communities.
- Communities' project proposals, funding requests and proposed interventions to the LDF need to be backed by loss and damage data and evidence. The participants felt it was important to have a dedicated loss and damage data and evidence collection and sharing system in place not only for communities and vulnerable groups but also for other loss and damage actors, such as academia, NGOs, CSOs, thinktanks, and the private sector who might be engaged in securing support within and outside the UNFCCC financial arrangements.
- Some participants suggested taking advantage of the MoDMR's existing mechanism (mentioned above), a bottom-up approach through which disaster loss and damage information is collected from the grassroots and then coordinated with the national level enabling a prompt response by decision makers. All participants pointed out that this mechanism has been helpful for NGOs and academia to collect information and extend their support quickly to the disaster-impacted people.
- Mostly local-level participants stressed that a dedicated LDF-related information channel is needed stretching from national level to local level. A free flow of information needs to be ensured so that communities, vulnerable groups and Indigenous Peoples are aware of the LDF information, updates and announcements.

### LDF Board level

- The LDF Board must take into consideration country-level realities, for example, Bangladesh's as is given here, in developing modalities to facilitate access to the Fund's

## Box 2: Women-led CSOs in disaster and climate action

Christian Aid Bangladesh works with 56 local women-led CSOs from Khulna, Satkhira, Jamalpur, Kurigram, Cox's Bazar districts building their capacity on disaster risk management, climate change actions and resilience. It started to work with these CSOs in 2019 with funding from UN Women. Though the CSOs were already working on issues like disaster risk reduction, water and sanitation, Dalit, transgender, disabled and left behind community rights, and women and children's rights issues, they lacked disaster risk management and climate action leadership skills.

Initially, 100 CSO members were trained in preparedness, inclusive disaster response, adaptation and leadership. Since then, Christian Aid has continued to support these organisations with its own fund, strengthening both human and institutional capacity, and observing their impacts at community level.

Of the 56 CSOs, 4 have been awarded NGO Affairs Bureau approval to date – now they are able to receive and manage foreign funds. These CSOs are non-profit entities working with government organisations and NGOs to bring a positive change in their community.

Major gaps remain in the staff's educational qualifications, lack of project design and management skills, language barriers (which is a must for international coordination), and digital literacy.

resources. Though, it is still not clear how the LDF will fund communities and vulnerable groups' interventions, all interviewed participants shared the concern that if national governments face challenges in accessing finance from existing climate funds, then undoubtedly, communities and vulnerable groups will find this process much harder under typical accreditation practices. In most cases, it takes years for national institutions to be accredited for multilateral climate funds, and an average of around two years to have proposals approved from the existing climate funds. Participants pointed out that communities and vulnerable groups who are experiencing the climate crisis first hand should not have to wait that long for finance.

- All participants agreed that the LDF should have an easy, simple and user-friendly finance application process to make support accessible to communities and vulnerable groups from different regions of the country. The application must have clear guidelines and instructions; it would be helpful if it could be translated into different languages too. The monitoring, evaluation, reporting and documentation system should be easy and manageable by them so that it doesn't overburden them. Administrative work needs to be streamlined too (see Box 3).
- The LDF needs to further clarify which entities from communities and vulnerable groups are eligible to apply for small grants. In the absence of such clarity, interested community-level entities, such as community-based or community-led organisations, are likely to end up wasting their valuable time and other resources completing the application process when they aren't actually eligible for the grant.
- To enhance stakeholder engagement with the Board, communities, vulnerable groups and their organisations need to be supported, including financially, so that they can send representatives to LDF meetings and proceedings.
- The LDF needs to recognise different country contexts, e.g. democratic and non-democratic, and consider community and vulnerable groups' needs, priorities and preferences when developing access modalities. Community entities should not have to get approval from their respective government entities and should instead be able to directly access the Fund. There should be a direct fund transfer option for communities and vulnerable group entities that is effective and non-discriminatory.

### Box 3: A women-led CSO accessing finance from a local fund to reduce loss and damage in its community

Asma Khatun (35) is the president of Dakshin Bedkashi Sardar Para Mahila Samiti, a women-led association from Dakshin Bedkashi Union under Koyra Upazila of Khulna District. Formed in 2012, this association's interventions include evacuating people with disabilities and elderly people to safe places during disasters, assisting marginalised groups struggling with poverty, and restoring forests. Currently the association is implementing small-scale construction schemes including constructing connecting roads and a wooden bridge to provide access to their local educational institutions cum cyclone shelters.

Asma said, 'I feel very happy to work for my community in this new way. I think working for my community in coordination with the local administration and relevant multiple stakeholders has opened new ways of communication for me, and our association.'

The association Asma leads submitted a proposal to improve access roads to shelter in her communities to Nowabanki Gonomukhi Foundation (NGF), a partner of Christian Aid with whom it is implementing Cyclone Forecast Based Early Actions to Reduce Disaster Loss and Damage (CFBA) in the coastal belt of Bangladesh to reduce loss and damage from impending cyclones. This proposal was granted, and

the association was awarded group cash as per Christian Aid's localisation commitment.

Both NGF and Christian Aid held capacity-building initiatives with Asma's association and four other potential scheme implementors on responding to calls for proposals, project design, and managing accounts, bills, and vouchers including VAT and tax as per Bangladesh Government's rules and regulations. Training sessions included safeguarding and accountability to mitigate risks in the project and foster an improved working environment.

**Below:** Photo: Asma Khatun (35)





## Overall recommendations

- The LDF Board must take into consideration communities and vulnerable groups' status quo, challenges, needs and priorities in developing finance access modalities.
- Both the LDF Board and the respective national governments of developing countries must provide technical and financial support to prepare communities and vulnerable groups to access small grants from the LDF and then use the grants themselves to respond to economic and non-economic losses and damages generated by sudden and slow-onset climate-related events.
- The LDF Board needs to further clarify, for instance, which communities and vulnerable groups are eligible to apply for small grants.
- The LDF Board must adopt a simplified accreditation process to provide small grants to communities, Indigenous Peoples and vulnerable groups directly, or via national entities when the system does not allow direct access. It should set indicators, such as number of locally led projects or amount of finance allocated to communities in a certain period of time, to evaluate the performance of its small grants modality.
- The LDF must help strengthen technical capacity and resourcing of climate-impacted communities so they are able to comply with policies and procedures, safeguards and fiduciary standards.
- The LDF Board must also provide support, including financial support, to communities, vulnerable groups and their organisations so that they are able to represent themselves in meetings and proceedings.
- Learning from the existing climate funds, the LDF Board should develop modalities that ensure adequate finance reaches climate-impacted communities and vulnerable groups quickly.

## Annex A: Interview questions

1. The Loss and Damage Fund was operationalised in COP28 to support the developing countries for responding to climate loss and damage whose mandate also includes addressing loss and damage from extreme weather events and slow-onset events . To what extent do you think the communities and the vulnerable groups on the frontline of climate crisis will benefit from the Fund?
2. What are the barriers do you think the communities and community groups/CSOs might face in directly accessing small grant funding from the LDF?
3. How do you think those barriers could be addressed?
4. Is Bangladesh Government taking any measures to address these challenges and barriers in making the communities and vulnerable groups ready to access the financial resources from the LDF? If so, what are those?
5. Do you see any role of SNLD in supporting communities accessing the LDF?
6. What would be your suggestions to address those potential barriers faced by frontline people for the below stakeholders:
  - The Loss and Damage Fund Board
  - Government negotiators
  - Government officials/civil servants
  - Community based/led organisations (CBOs)
  - CSOs at international, national and local level

## Endnotes

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