Disability-Inclusive Climate Finance: The Road to COP31 and Beyond

Final Report

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List of terms and abbreviations

AEPC	Alternative Energy Promotion Centre
ADB	Asian Development Bank
AF	Adaptation Fund
BAPPENAS	Badan Perencanaan Pembangunan Nasional (National Development Planning Agency)
BPDLH (IEF)	Badan Pengelola Dana Lingkungan Hidup (Indonesia Environment Fund), Indonesia
CADiR	Collective Action for Disability Rights in Nepal
CCMD	Climate Change Management Division, Ministry of Agriculture, Forests and Environment, Nepal
CCCF	County Climate Change Fund
CBM	Christian Blind Mission
CSO	Civil society organisation
CRPD	Convention on the Rights of Persons with Disabilities
DEN	Disability Empowerment Network
DFAT	Department of Foreign Affairs and Trade, Australia
FAO	Food and Agriculture Organization
FCDO	Foreign, Commonwealth & Development Office, UK
FLLoCA	Financing locally led climate action
FRLD	Fund for Responding to Loss and Damage
GCC	Gifted Community Center
GCF	Green Climate Fund
GESI	Gender equality and social inclusion
GEDSI	Gender equality, disability and social inclusion
GEF	Global Environment Facility
ICIMOD	International Centre for Integrated Mountain Development
IUCN	International Union for Conservation of Nature
IDR	Indonesian Rupiah
IERD	International Economic Relations Division, Ministry of Finance, Nepal

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KII	Key informant interview
KLHK	Kementerian Lingkungan Hidup dan Kehutanan (Ministry of Environment and Forestry), Indonesia
LAPA	Local Adaptations Plans of Action
LI-BIRD	Local Initiatives for Biodiversity, Research and Development
LLA	Locally led adaptation
LLCA	Locally led climate adaptation
MSC	MicroSave Consulting
NDA	National designated authority
NDC	Nationally Determined Contribution
NEMA	National Environment Management Authority
NGOs	Non-governmental organisations
NIDSEWA	National Indigenous Disabled Self Employment Women Association
NIMB	Nepal Investment Mega Bank
NFDN	National Federation of the Disabled, Nepal
NTNC	National Trust for Nature Conservation
NWCF	Nepal Water Conservation Foundation
ODA	Official development assistance
OECD	Organisation for Economic Co-operation and Development
OFP	Operational Focal Point
OHCHR	Office of the United Nations High Commissioner for Human Rights
OPDs	Organisations of persons with disabilities
PT SMI	PT Sarana Multi Infratsruktur, Indonesia
PwDs	Persons with disabilities
SECF	Sustainable Energy Challenge Fund
SGP	Small Grants Programme
SIGAB	Sasana Inklusi dan Gerakan Advokasi Difabel (Inclusion and Disability Advocacy Movement), Indonesia
TDF	Town Development Fund
UDPK	United Disabled Persons of Kenya

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UNDP	United Nations Development Programme
UNEP	United Nations Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change
UNIDO	United Nations Industrial Development Organization
UNOPS	United Nations Office for Project Services
UN	United Nations
UNDRR	United Nations Office for Disaster Risk Reduction
USD	United States Dollar
WFP	World Food Programme
WWF	World Wildlife Fund

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Scope and limitation

This report examines how finance provided through the Green Climate Fund (GCF), Global Environment Facility (GEF) and Adaptation Fund (AF) moves through national and local financing systems in Kenya, Indonesia, and Nepal. It covers mitigation and adaptation finance, including relevant domestic public-finance channels. The Fund for Responding to Loss and Damage (FRLD) is considered at the policy level because its operating arrangements are still developing; other sources, including development-bank lending, UN agencies and private finance, are included only where they form part of the pathways examined.

The evidence combines official fund and policy documents with purposive key informant interviews involving national authorities, fund managers, intermediaries, local actors, OPDs and persons with disabilities. The sample is qualitative and non-representative, and its size and composition vary across countries. Limited disability-aggregated financial and outcome data means that the report identifies institutional patterns and access barriers but cannot quantify the proportion of climate finance reaching persons with disabilities of comparing country performance statistically.

The interview component prioritized the national and local actors through whom climate finance is approved, managed and delivered. Within the available research period, representatives of the GCF, GEF, and AF were not interviewed. Fund-level findings therefore describe what official policies, Board decisions and accreditation standards provide, supported by national stakeholders' accounts of how those requirements operate in practice. They could not be tested against the funds' own explanations of their intent or application. Where the report states that no requirement, indicator or example was identified, this means that none was found in the evidence reviewed; it does not establish that none exists. Annex 5 provides the full methodology and evidence limitations.

Executive summary

Climate finance passes through several institutions before it reaches communities. Multilateral climate funds and donors establish financing requirements. National authorities endorse or approve proposals, while accredited entities, implementing entities and other intermediaries determine how resources reach communities and which downstream partners participate.

This report examines where persons with disabilities (PwDs) and their representative organisations gain or lose access, influence and decision-making power as finance from the Green Climate Fund (GCF), the Global Environment Facility (GEF) and the Adaptation Fund (AF) moves through national and local systems in Kenya, Indonesia and Nepal.. It treats this as a question of climate justice. PwDs face disproportionate climate risk, yet they have the least say over how finance to address that risk is designed, allocated and governed. It is also a question of financial justice: who controls climate finance, and who carries the cost and risk of disability inclusion. The research was conducted with organisations of persons with disabilities (OPDs) as knowledge holders, rather than solely as respondents and included interviews with PwDs themselves to capture their direct perspectives.

The analysis assesses five conditions: Whether PwDs and OPDs can access finance, influence decisions, control a share of resources, benefit from outcomes and hold institutions accountable. The findings draw

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on document reviews and key informant interviews (KIIs). Annex 5 presents the full methodology and evidence limitations. In this report, fund refers to a financing institution or mechanism, while finance refers to the financial resources it mobilises and allocates.

What we found

Fund-level findings: Each fund connects to country systems through a designated national authority or focal point, but delivery arrangements differ. The GCF and AF channel finance through accredited or implementing entities, while the GEF works through GEF agencies. Its Small Grants Programme (SGP) provides a more localised channel. Disability-related considerations feature primarily in safeguard and risk management arrangements rather than results frameworks. Recognition also varies across the funds. The GEF and AF explicitly refer to PwDs in their safeguards, while the GCF recognises them through the International Finance Corporation (IFC) Performance Standards, which it has adopted as its interim safeguards. None of the reviewed funds has a disability-specific results indicator. The review also identified no comparable disability-specific requirement for institutional access. Gender considerations receive more explicit operational treatment. The GCF tracks gender-disaggregated impact data, GEF agencies are assessed against minimum gender equality standards and AF accreditation assesses implementing entities' capacity and commitment to apply its Gender Policy. The three funds' architecture is set out in full in Annex 1.

Country-level findings: The pattern is shared, but the point of failure differs.

- **Indonesia:** Domestic climate finance exceeds international inflows by more than four times. However, the Government of Indonesia's climate budget tagging and expenditure tracking systems do not include an equivalent disability-responsive mechanism. Fiduciary, compliance and funding-scale requirements further limit the ability of OPDs and smaller civil society organisations (CSOs) to become delivery partners.
- **Nepal:** Disability is recognised in climate policy and selection criteria, but ministries that approve proposals focus primarily on funding volume, procedures and disbursement. No shared requirement defines the outcomes that disability inclusion must achieve. As a result, accredited entities and intermediaries largely control project design and monitoring.
- **Kenya:** Climate finance reaches all 47 counties through performance-based transfers. However, this review found no consistent funding route from county mechanisms to OPDs. OPDs also lack systematic representation in the ward- and county-level bodies that set priorities and allocate budgets.

The fuller country case studies, including the underlying financing-pathway tables and maps, are set out in Annexes 2, 3 and 4.

Across all three countries, policy recognises disability, but rules that govern funding decisions do not consistently reflect this commitment. In justice terms, these systems deliver recognition without redistribution. The review identified no disability-specific condition that could affect eligibility, proposal approval, partner selection, resource allocation or disbursement. The point at which recognition loses operational force differs by country. In Indonesia, fund managers select delivery partners. In Nepal, accredited entities shape project design and partnerships. In Kenya, county institutions set local priorities and budgets.

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Across international development finance, disability remains poorly visible. In 2023, fewer than one in five official development assistance (ODA) activities related to climate, disaster risk and gender reported disability inclusion. Approximately one in 100 identified disability inclusion as a principal objective. Country-level evidence shows how financing pathways perpetuate this lack of visibility. OPDs are often absent when stakeholders set priorities. They are also absent from readiness assessments during the selection process and support reaches them only afterwards. Within the evidence reviewed, we identified no case in which finance from the GCF, GEF, or AF reached an OPD directly.

Key messages

- **Recognition is not inclusion**: Disability-inclusive climate finance requires PWDs and OPDs to access finance, influence decisions, control resources, benefit from outcomes and hold institutions accountable.This rights-based approach is grounded in the Convention on the Rights of Persons with Disabilities (CRPD)
- **Commitments change practice when they carry consequences**: Disability inclusion must be linked to a rule that applies at a financing decision point, such as accreditation, proposal approval, partner selection, allocation, disbursement or performance assessment;
- **Localisation does not automatically redistribute power**: Finance that moves closer to communities does not ensure OPD access or influence unless OPDs have formal roles in decision-making and institutions provide resources for accessible participation as a core cost rather than an add-on. Moving delivery closer without moving control changes logistics, not power.
- **Current systems provide a foundation**: Gender tags, markers, assessments and allocation rules demonstrate that financing systems can operationalise a cross-cutting inclusion priority. These systems could be adapted to disability inclusion and address disability-specific barriers;
- **The components of a workable pathway already exist but need to be connected and sequenced**: OPDs need to participate when priorities are set, readiness support must come before selection, disability conditions must apply at approval, accessible finance must be available during delivery and disability-disaggregated monitoring must follow implementation.

What needs to change

As climate finance increasingly funds the shift to low-carbon economies, these changes also determine whether that transition is just for PwDs. If disability inclusion is absent when transition finance is designed, the new energy systems, jobs and services it builds risk reproducing the exclusion of current ones.

- **Global climate funds and donors: Make disability inclusion a condition of financing decisions.** The GCF Board and Secretariat, the AF Board and the GEF Council should require costed disability-inclusion plans and disability-disaggregated results indicators at the time of proposal approval. They should also assess disability-inclusion capacity through accreditation. The GCF's development of its own safeguards and the rules under development for the Fund for Responding to Loss and Damage (FRLD) and locally led financing windows provide specific opportunities to embed these requirements before systems are finalised. The same applies to just transition finance, where disability inclusion requirements are easier to build in now than to retrofit later.

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- **National governments:** Extend existing gender tags and markers to disability. The strongest lever differs by country: national budget tagging in Indonesia, donor requirements and the Procedure for the Operation of Climate Change Management Committees 2082 in Nepal, county structures and the Financing locally led climate action (FLLoCA) performance assessment in Kenya;
- **Accredited entities and intermediaries:** Address exclusion before funds are allocated. In Nepal, the Alternative Energy Promotion Centre (AEPC) should strengthen disability data and reporting through its Sustainable Energy Challenge Fund (SECF), while the National Trust for Nature Conservation (NTNC), the Nepal Investment Mega Bank (NIMB) and AEPC should also incorporate disability inclusion plans into proposals under development. In Indonesia, the Badan Pengelola Dana Lingkungan Hidup (BPDLH) and its intermediaries should apply disability-inclusive subgranting criteria. They should also provide proportionate due diligence and readiness support before they select delivery partners. Across these pathways, eligibility, proposal design and partner selection offer key opportunities to operationalise inclusion;
- **Funders and delivery institutions**: Fund OPD participation and accountability. Donors, intermediaries and implementing entities should fund OPD participation in programme design and delivery, recognise accessibility and reasonable accommodation as eligible costs and give OPDs defined roles in outcome reviews. Current pathways, such as county-level climate finance in Kenya and intermediary-led funding in Indonesia and Nepal, can support participation, organisational readiness and accountability without the need for parallel financing mechanisms.

Several of these windows open around the 31st Conference of the Parties (COP31) including negotiations on just transition. The test afterwards is whether institutions combine the components now found in separate programmes (Section 6), so that finance justified on climate justice grounds reaches, and is shaped by, those most exposed to climate harm.

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1. What does inclusive climate finance look like?

1.1 The road to COP31 and beyond: Why disability-inclusive climate finance matters now

Climate finance is set to grow. At COP30 in Belém, Brazil, parties called for adaptation finance to triple by 2035. The new Belém Gender Action Plan recognised that disability is one of the factors that shape how people experience climate change. The institutions, criteria, and channels through which this finance will flow are still being developed ahead of COP31. Yet, PwDs still have no formal constituency in the United Nations Framework Convention on Climate Change (UNFCCC) process: The Disability Caucus, recognised by the UNFCCC in early 2026 as an informal stakeholder group, is still seeking full constituency status.

This report asks: where do PwDs and their representative organisations gain or lose access, influence and decision-making power as climate finance moves through these systems? The analysis covers climate finance for both mitigation and adaptation. It examines the financing systems and decisions that shape access to and participation in climate investments.

We traced this question through three multilateral climate funds, the GCF, GEF and AF, through national and local financing pathways in Kenya, Indonesia and Nepal. The fund-level analysis draws on published policies and decisions. As the interview component prioritized actors within the three country financing pathways, representatives of the funds were not interviewed within the available research period; the implications of this limitation are explained in Annex 5. We reviewed the FRLD at the policy level because its operating modalities are still under development. Climate finance here includes international funds and the domestic public finance through which they are delivered: national budgets, fiscal transfers and county, municipal and village budgets. The form of finance matters as much as its source: grants, loans and results-based payments each set different conditions on who can use them.

We conducted the research with OPDs as knowledge holders, not only as respondents. Interviews included PwDs themselves, who provided a direct perspective on what affected them personally and their work through the OPDs.

This report defines disability-inclusive climate finance in practical terms: PwDs and their representative organisations can access finance, influence decisions, control a share of resources, benefit from climate investments and hold institutions accountable. This requires disability inclusion to be embedded in the rules, financing decisions, implementation arrangements and monitoring systems that determine how resources are allocated and used. Recognition of disability in policies and safeguards is an important first step, but it does not, by itself, ensure these outcomes.

1.2 Unequal risks, invisible rights holders: PwDs face greater climate risk but remain unseen in climate finance data

Around 1.3 billion people, about 16% of the global population, live with significant disability. Climate risks affect people differently because disability intersects with gender, age, indigeneity, and poverty. These factors shape people's exposure to climate hazards and their ability to access information, services, infrastructure and decision-making processes.

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Their greater exposure to climate harm comes from barriers to information, infrastructure, services and decision-making, not from impairment. The 2023 global survey by the United Nations Office for Disaster Risk Reduction (UNDRR) found that more than 6,000 PwDs in 132 countries had no personal disaster preparedness plan, with 84% reporting this. It also found that 86% had not taken part in community disaster risk planning. Neither figure had improved in a decade.

The climate finance system largely cannot see them. Of the climate, disaster risk reduction and gender-related ODA activities reported against the Organisation for Economic Co-operation and Development (OECD) disability marker in 2023, fewer than one in five were disability-related and about one in 100 had disability inclusion as a principal objective. Under the main adaptation indicator used by the United Kingdom (UK), disability data accounted for 3% of reported results, compared with 72% for sex.

These figures show that the system is not designed to determine whether financial services reach PwDs. Where nothing is counted, exclusion carries no consequence. This absence reveals the climate finance system's limited ability to track disability inclusion. It also limits the evidence available to determine whether and how climate finance reaches PwDs.

1.3 From international commitment to accountability

International commitments establish the mandate: The Paris Agreement preamble names the rights of PwDs among the human rights obligations that Parties should respect, promote and consider when taking climate action. The Sendai Framework for Disaster Risk Reduction recognises PwDs and their organisations as essential to assessing risk and to designing and implementing disaster risk reduction. The 2030 Agenda commits States to leave no one behind. The International Court of Justice's Advisory Opinion of 23 July 2025 confirmed that States' climate obligations extend to financial and technological cooperation and must be read alongside their human rights obligations. These frameworks make disability inclusion a stated commitment, but none of them defines what meeting it requires of climate finance.

The Convention on the Rights of Persons with Disabilities (CRPD) sets the accountability benchmark and defines the standard that this report applies.

- Article 32 requires international cooperation to be inclusive of and accessible to PwDs. This applies directly to international climate finance, from the design of financing mechanisms to the processes through which resources are accessed;
- Article 4(3) requires States to closely consult and actively involve PwDs, through their representative organisations, in developing and implementing legislation and policy. General Comment No. 7 establishes that this participation must be adequately resourced and able to influence outcomes. For this report, that means examining participation not only in consultation but in the decisions that set climate priorities and allocate finance;
- Article 11 requires States to ensure the protection and safety of PwDs in situations of risk, including natural disasters. Adaptation and loss and damage finance are among the main means of meeting it;
- **Articles 31 and 33(3)** require disaggregated data and give OPDs a role in monitoring implementation.

Together, these provisions translate a general commitment into three tests for climate finance: Can PwDs access it, can OPDs shape the decisions behind it and can PwDs and OPDs monitor its delivery and hold

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institutions to account. This report consistently notes, however, that being consulted is not the same as having influence.

1.4 From vulnerability to agency: A human-rights model of disability

The CRPD treats PwDs as rights-holders, knowledge-holders and decision-makers, not objects of protection or charity. Climate finance still largely works on the older model: Disability enters through safeguards and "vulnerable groups" categories. Safeguards assess whether a project avoids or mitigates harm, while performance systems assess whether it achieves intended results and who benefits. When institutions address disability only through safeguards and omit it from performance indicators and results monitoring, exclusion can remain invisible because the system does not require them to measure whether PwDs benefit.

Table 1: Five conditions of disability-inclusive climate finance

Condition	Rights and global standard	Test applied in this report	Stage in the chain
Access	CRPD Art. 32 LLA Principle 3	Can OPDs meet eligibility, fiduciary and application requirements, directly or through a dedicated pathway?	Access (Design)
Influence	CRPD Art. 4(3), General Comment No. 7, LLA Principle 1	Do OPDs influence priorities and project selection through formal decision-making roles or other meaningful ways to shape outcomes, beyond consultation alone?	Decision making
Control	LLA Principle 1, GCF locally led climate adaptation (LLCA) framework (devolved decision-making and finance)	Is any share of resources decided by OPDs, or by local structures in which they are represented?	Financing architecture
Benefit	CRPD Art. 11, LLA Principle 2, Office of the United Nations High Commissioner for Human Rights (OHCHR) A/HRC/44/30	Does disability serve as a criterion to target beneficiaries? Are accessibility and reasonable accommodation budgeted and do performance systems assess whether PwDs benefit?	Outcomes
Accountability	CRPD Arts. 31 and 33(3), LLA Principle 7	Is disability tracked in disaggregated data and does an unmet commitment affect approval, allocation or performance?	Every stage

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Viewing it through an ableism lens can explain why exclusion persists despite commitments. Systems built around non-disabled norms assume mobility, communication and digital access. Ableism refers to beliefs, attitudes and systems that devalue PwDs or privilege non-disabled norms.

They treat reasonable accommodation as an added cost rather than a condition of equal participation. They may privilege experience with large grants over OPDs' knowledge of risks in their own communities. Reasonable accommodation means necessary and appropriate modifications or adjustments that enable PwDs to exercise their rights on an equal basis with others.

1.5 Defining disability-inclusive climate finance

Climate finance is disability-inclusive when PwDs and their representative organisations can access it, influence decisions about it, control a share of its resources and benefit from its outcomes and when the institutions that manage it are accountable to them for each.

Each condition rests on a standard the system has already accepted. The Principles for locally led adaptation (LLA) name PwDs in principle 2 and the AF Board has endorsed them. The GCF's Locally Led Climate Action (LLCA) framework commits to devolved decision-making and finance. The gap is in applying them to PwDs.

1.6 From commitment to consequences: Four propositions

Climate finance moves through a chain of decisions, from global commitments and financing rules to access, resource allocation and outcomes. At each stage, different institutions determine whether PwDs and their representative organisations can access finance, influence decisions, control resources, benefit from investments, and hold institutions accountable. The analysis identifies four propositions about where disability inclusion is recognised, where it breaks down, and where change is possible.

Recognition sits at the top of the chain, while power rests in the middle. Disability is most visible at the macro level, in the CRPD, national policy and fund safeguards. However, accredited entities and intermediaries determine influence, control and practical access at the meso level. Accredited entities and intermediaries exercise significant influence over proposal design, partner selection and budgets, yet disability inclusion is not consistently embedded in the rules that govern these decisions.

A commitment changes behaviour only when it carries a consequence. Climate finance systems enforce what they measure, namely fiduciary standards, disbursement targets and safeguard compliance. The test is whether excluding PwDs would stop, delay or reduce financing. Where it would not, the commitment is rhetorical.

The gap is a matter of priority, not capacity. Gender has gained markers, budget tags, focal points and mandatory assessments in the same institutions.

The exclusion of OPDs compounds issues across visibility, eligibility and accountability: They are uncounted, do not meet entry requirements and hold no formal role in decision-making, as Section 3.4 details.

We assess each condition with three types of evidence: What an institution commits to, what its financing architecture enables and what is evidenced in practice. We classify findings against three thresholds: Required means the condition is written into eligibility, approval or reporting rules, such that non-compliance affects a financing decision. Recognised means the condition is named in policies but carries no operational consequences, it is referenced without being tied to eligibility, approval or reporting. Absent

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means no reference to the condition appears in policy, financing criteria or reporting requirements. Gender serves as the comparator throughout. Tables 2 and 3 apply this classification to the funds and the countries.

The analysis applies four lenses. These lenses guide the interpretation of the evidence throughout the report and inform the recommendations in Section 5.

Lens	What it examines
Localisation	Whether decisions and resources, not only activities, move towards local actors and OPDs.
Power and financial justice	Who sets priorities, controls allocation and bears the cost and risk of finance.
Intersectionality	How disability combines with gender, Indigeneity, age and poverty to compound exclusion.
Accountability	To whom institutions answer, upwards to funders and downwards to rights-holders and what follows when commitments are not met.

Section 2 locates where the chain breaks, Section 3 presents the evidence from the countries and Section 4 sets out what turns recognition into consequences.

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2. How does climate finance reach local actors and where does it stop?

The four lenses above provide cross-cutting questions to interpret the evidence. Section 2 separately maps where financing decisions occur across three institutional stages: Macro, meso, and micro. The lenses and stages therefore serve different purposes: The lenses examine disability inclusion, while the stages locate actors and decisions along the financing chain.

Level	What happens at this stage
Macro	Global fund governance, national climate authorities and national policy frameworks establish formal commitments, strategic priorities and access rules.
Meso	Accredited and implementing entities, intermediaries and subnational governments design programmes, select partners, allocate or channel finance and apply fiduciary requirements.
Micro	OPDs, community organisations, local networks and other community-level actors shape how people experience access, influence, implementation and benefits.

*Note: Institutions are classified according to their function in the financing pathway rather than administrative status. A subnational government is therefore classified as meso when it allocates or intermediates finance.

2.1 How global funds enter countries and recognise disability-inclusion

A fund may give a national institution direct access to finance, but this does not ensure that local organisations can access funds directly. Each fund connects to country systems through a designated national counterpart: the GCF national designated authority (NDA), the GEF Operational Focal Point (OFP) or the AF Designated Authority. Finance then moves through accredited or implementing entities, GEF Agencies and executing partners (Table 2 and Annex 2). The GCF and AF provide direct-access modalities, and national entities in all three countries hold accreditation under both funds. The GEF has no direct-access model, although its SGP provides the shortest route among the three funds to community organisations.

The three funds differ in where and how specifically they recognise disability. GEF safeguards contain explicit provisions for disability inclusion, while the AF's updated 2026 Environmental and Social Policy explicitly identifies PwDs as a marginalised and vulnerable group. The GCF's own overarching Environmental and Social Policy does not explicitly mention disability. However, the fund recognises disability under the International Finance Corporation (IFC) Performance Standards, which it adopted as its interim Environmental and Social Safeguards. Despite these differences, all three funds primarily address disability-related considerations, where they do so, through safeguards and risk-management arrangements rather than results and performance systems. None of the three funds has a disability-specific results indicator or tests disability-inclusion capacity as a distinct accreditation criterion.

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Table 2: Formal access modalities and inclusion provisions of the GCF, GEF, and AF

Criteria	GCF	GEF	AF
Access modality	Direct access through national accredited entities, or international access through international entities	No direct access. Finance flows through GEF Agencies	Direct access through National Implementing Entities
Who decides downstream	The direct access entity selects partners and sets sub-granting terms	GEF Agencies for mainstream projects. For the SGP, National Steering Committees that include civil society	The National Implementing Entity manages the full project cycle
Route that devolves decisions	Enhancing Direct Access, LLCA Framework (2025), now being put into operation	SGP, a shorter route direct to CSOs and community organisations	Single-country LLA window, enhanced direct access (EDA) merged into it and regional LLA window, streamlined accreditation for smaller entities
Disability in fund rules	The GCF's Environmental and Social Policy does not explicitly mention disability. Applicable interim safeguards recognise disability as a potential vulnerability factor. The GCF has no disability-specific results indicator or accreditation criterion.	Recognised through safeguards that contain explicit provisions for disability inclusion. SGP names PwDs as a target group	Recognised within the Environmental and Social Policy's principle on marginalised and vulnerable groups. No disability results indicator. No disability capacity tested at accreditation
Gender comparator	Gender Policy and Action Plan. Gender assessment and action plan required with funding proposals. Gender policy tested at accreditation. Gender-disaggregated impact data tracked	Mandatory gender policy. Gender analysis, action plan and sex-disaggregated indicators required in projects. Gender tag	Dedicated gender policy. Gender safeguard capacity required for accreditation
Window open now	LLCA Framework operationalisation	GEF-9 replenishment has concluded and the programme starts	LLA windows entering operation
Status	Recognised	Recognised programme level and SGP	Recognised

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*Table 2 summarises the funds' published access modalities and policy provisions. It does not assess how these rules work in practice or establish whether finance reaches local actors.

Each recognises disability within safeguard language on vulnerable or marginalised groups, but none carries a disability results indicator or tests disability capacity at accreditation. By contrast, the GCF tracks gender in its impact data, and the AF makes gender a condition of accreditation. Accreditation and proposal preparation also involve substantial, largely fixed costs. These costs place a heavier burden on smaller organisations and can operate as a de facto size threshold. Country evidence in Section 3 identifies these requirements as barriers for OPDs and smaller CSOs. However, this study did not collect sufficient applicant-level data to determine how frequently organisations decide not to apply.

Finally, direct access does not necessarily translate into local access. It changes which national institution can receive finance, but does not, by itself, ensure direct access to finance for local organisations or OPDs. Downstream access depends on how accredited or implementing entities design programmes, select partners and establish sub-granting requirements. The GCF's LLCA framework and the AF's LLA windows provide opportunities to embed disability-inclusive access and participation as these modalities are operationalised.

2.2 From global fund architecture to national delivery: Where access breaks down

The analysis has examined the formal policies and access modalities of the three global funds. It now examines how finance flows through national systems in Indonesia, Nepal and Kenya. It also explores where access breaks down for OPDs and other local actors.

The country analysis below identifies where formal recognition of disability fails to translate into access to, influence over, or control of climate finance. The point of breakdown differs across countries because financing responsibilities, intermediary arrangements and local decision-making structures are organised differently. Read in chain order, Indonesia breaks between the macro and meso levels, Nepal within the meso level and Kenya between meso and micro.

Indonesia: The break falls between macro and meso

In Indonesia, access for PwDs, OPDs, and smaller CSOs breaks down when the fiduciary, safeguarding and reporting requirements attached to large-scale climate finance are translated into eligibility criteria for local delivery partners. Indonesian fund managers and intermediary organisations interviewed for this study reported difficulties in identifying grassroots organisations capable of meeting these requirements and managing the funding volumes involved.

Many OPDs and smaller CSOs have strong community relationships and relevant expertise but lack established financial systems, specialised staff, compliance frameworks and experience in administering large grants. Because these capabilities are generally required at the point of selection, while funds limit readiness support or provide it only after selection, selection criteria exclude many organisations before they can become viable partners. The mismatch concerns both procedure and scale. For example, BPDLH's intermediary facility sets a minimum funding request of IDR 5 billion (approximately USD 300,000), a volume beyond the capacity of many smaller OPDs and grassroots CSOs. This threshold does not, in itself, demonstrate exclusion. However, it illustrates the gap between the scale of finance on offer and the current fund-management capacity of many potential local partners.

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The break therefore occurs before OPDs can enter an intermediary relationship: Finance exists at the macro level, but the organisations closest to PwDs remain unable to access the meso-level institutions through which it is distributed, because those institutions apply fiduciary, compliance and funding-threshold requirements that OPDs and smaller CSOs are not equipped to meet yet.

Nepal: The break falls within the meso level

Nepal's policy framework explicitly addresses disability and social inclusion in climate governance. Section 8.9 of the 2019 National Climate Change Policy identifies persons with all forms of disability among groups whose needs must be mainstreamed into climate action. The 2026 Nationally Determined Contribution (NDC) 3.0 includes a dedicated section on gender equality, disability and social inclusion (GEDSI). The Climate Finance Mobilisation Procedure, 2082 Bikram Sambat (BS), embeds inclusion as a criterion for climate finance project selection. Federal devolution further distributes climate governance responsibilities to provincial and local governments, creating sub-national entry points for inclusive implementation. The Local Adaptation Plans of Action (LAPA) framework gives local governments a formal planning role and names PwDs among intended participants. Reviews of LAPA practice, however, report that their involvement in local vulnerability assessment and planning is often limited.

The break occurs where this recognition should become a requirement. The two ministries that approve proposals described their role as checking fund size, procedure and disbursement efficiency. The Ministry of Finance reported that its focus is on increasing the size of funds coming into the country rather than on aspects such as disability inclusion in the funds received. The Climate Change Management Division (CCMD) reported that its criteria include disability, but the fund makes the final decision. Accredited entities and intermediaries instead lead project-level implementation and reporting arrangements that cover post-approval monitoring of disability outcomes. Whether they include and monitor disability, therefore, depends largely on fund requirements and project designs. AEPC, the International Centre for Integrated Mountain Development (ICIMOD) and the donor programmes reviewed here all refer to disability in their documents. No shared requirement sets what that reference must produce.

Where OPDs do receive funds, they usually do so as secondary implementers within a chain, as when the Australian Department of Foreign Affairs and Trade (DFAT) funds The Asia Foundation, which selects the National Federation of Disabled, Nepal (NFDN) to implement it in each area. OPDs can therefore reach intermediaries, but mainly through routes that donors have built for them. Where no donor has built one, the intermediary decides whether to include disability and OPDs have no formal means of influencing that decision. Finance exists at the macro level, and local planning structures exist at the micro level. Between them, disability depends on the intermediary's discretion.

Kenya: The break falls between meso and micro levels

The break falls between meso and micro. Kenya has institutionalised local decision-making within the financing cycle. County Climate Change Funds link county finance to ward-level planning and FLLoCA extends the model to all 47 counties through performance-based transfers, with each county allocating at least 1.5% of its development budget to climate. Finance therefore reaches the county. But PwDs and OPDs are not systematically represented in the ward and county structures that set priorities, allocate resources and monitor results and no mechanism exists to move funds from the county to OPDs.

Table 3 summarises the access breakpoints identified in the country analysis above.

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	Macro level	Macro-to-meso link	Meso level	Meso-to-micro link	Micro level
Indonesia (Break: Macro to meso)	Ministries and funds	**Blocked** Capability requirements are assessed at selection, while readiness support arrives later.	Fund managers and accredited entities	**Weak** No qualified local partner at this scale.	OPDs and CSOs
Nepal (Break: Within meso)	Ministries	**Connected** Ministries check the fund size and procedure, but not disability.	Accredited entities	**Weak** Inclusion is left to each entity's discretion.	Local plans and OPDs
Kenya (Break: Meso to micro)	Treasury and national agencies	**Connected** Counties get a formal climate-budget transfer.	Counties	**Weak** No route from country funds to OPDs.	Wards and OPDs

Across the three countries, the chain breaks where a recognised commitment would have to become a condition of selection, approval or allocation. That point sits with a different actor in each: A fund manager in Indonesia, an accredited entity in Nepal, a county government in Kenya. This is why Section 5 targets its recommendations by actor rather than by country.

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3. What did the research find?

This section first sets out the findings from each country and then what the three countries show together. The full country evidence is in Annex 3. The country tables report what each system does. The synthesis reports the patterns that become visible only across countries and what they imply for advocacy.

3.1 Nepal: Key findings

Key findings	Highlight
Policy-finance gap	Nepal mentions disability in its climate policy, specifically its 2019 climate policy and 2025 Nationally Determined Contribution (NDC 3.0). GEDSI strategy recognises disability inclusion. However, this recognition is not consistently translated into climate-finance allocation and implementation mechanisms. Section 8.12(d) of the 2019 Policy, which targets climate budgets, does not name disability and the NDC 3.0 GEDSI targets carry no budget line. Gender, by contrast, has tagging, a marker in the aid information system, focal points on the GEDSI committees and a required assessment and action plan attached to every detailed proposal under the 2082 Procedure. Disability has none of these.
Upstream exclusion	OPDs hold no seat on the committees that govern climate finance (the Steering and Technical Committees under the 2082 Procedure). Views are mixed on CCMD widening consultation. OPD representatives describe it as tokenistic and others note that CCMD now invites them more often and has begun to accommodate disability inclusion needs such as sign-language interpreters.
Data invisibility	Climate and disaster systems lack disability-disaggregated data. The sector GEDSI Strategy records that no such system exists, and after the recent floods, the Ministry of Women asked NFDN, an OPD federation, for the data.
Donor-driven disability inclusion	Approving ministries focus on funding volumes and procedures rather than considering factors such as disability. As a result, disability receives most attention where a donor requires it. ICIMOD's mainstreaming across 28 Koshi basin municipalities followed the Australian DFAT's recommendations.
Meso break	The three OPDs consulted said they cannot meet the compliance requirements of the GCF, the GEF, or the AF and that no shared rule obliges intermediaries to include them. Neither approving ministry monitors disability outcomes after approval, so disability inclusion rests on each intermediary's own discretion.
Vulnerability framing	PwDs are reached as beneficiaries (through screening, referral and alerts), while OPDs are selected as secondary implementers by intermediaries rather than by decision-makers.
Promising but fragmented models	Bhimeshwor's capacity bridge, NFDN's climate theme in Collective Action for Disability Rights in Nepal (CADiR) and its emergency data portal and the 80% local-share rule that

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Key findings	Highlight
	ministries check each show a workable feature, but no pathway combines them. and none yet channels finance from a global climate fund to OPDs.

Source: Key KII

> OPDs usually are not even aware that these types of funds exist or if the funding period has opened. And when we do find out, we do not qualify to apply for the requirements that funds set. We don't have the resources or capacity as there are compliance requirements that are hard for us to meet.
>
> **— OPD, Nepal**

3.2 Indonesia: Key findings

Key findings	Highlight
Domestic-finance gap	Indonesia mobilises over four times as much climate finance domestically as it receives from international sources. However, the review identified no equivalent disability-responsive mechanism in the budget-tagging and expenditure-tracking systems for this larger financing pool. This gap makes disability-related allocations difficult to identify or assess. This contrasts with disability's recognition in laws and policy and with gender-responsive climate-budget tagging, which has been applied across three ministries since the 2017-2018 fiscal year.
Upstream exclusion	OPDs have limited influence over climate priorities and programme design, which can lead to exclusion before funding becomes available. OPDs and environmental organisations often work in separate networks and a study by Sasana Inklusi dan Gerakan Advokasi Difabel or the Inclusion and Disability Advocacy Movement (SIGAB) found that only 31% of PwDs had taken part in environmental or green-economy activities, in which most participated only as participants. > Environmental organisations often have limited links with OPDs and they work separately. As a result, environmental programmes often proceed without OPDs involvement because their needs and potential role are not well understood >**— CSO, Indonesia**
Data invisibility	Limited disability-disaggregated data constrains planning, targeting, emergency response and monitoring. Emergency datasets often record sex, but not disability; village and district records are frequently outdated and fund managers could not find

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Key findings	Highlight
	regency-level disability data. Stigma and non-disclosure further obscure needs, delaying identification, assistance and effective targeting.
Donor-driven disability inclusion	Disability receives greater operational attention when required by donors or investors, including in Australian DFAT, the Asian Development Bank (ADB) or the World Bank supported programmes. Equivalent requirements for domestically managed finance remain inconsistent and are often non-binding. In one fund manager's system, environmental and social due diligence can stop financing, while gender and disability assessments produce only recommendations. Upward donor compliance is stronger than accountability to communities and unmet disability inclusion commitments rarely affect approval, financing terms or performance assessment.
Macro-meso break	Accreditation, fiduciary and organisational capacity requirements demand substantial time, resources and established systems that many OPDs and smaller CSOs lack. These requirements often filter them out before they can qualify as funding partners. BPDLH's intermediary window starts at IDR 5 billion (about USD 300,000) and readiness support generally follows selection, which filters out smaller actors. Fund managers confirmed these readiness barriers, but the research did not establish whether they would seek external support to address them. "We continue to face difficulties finding local organisations capable of managing large funding volumes. Many grassroots organisations do not yet meet the required capacity standards. This is compounded by persistent stigma that PwDs cannot manage funding independently due to their 'restricted' capability." **— Fund Manager, Indonesia**
Vulnerability framing	PwDs are more often recognised through safeguards as vulnerable beneficiaries than as implementers, rights-holders and decision-makers. Readiness accommodation may be treated as additional cost, while assumptions that PwDs cannot manage funds independently further restrict access. In SIGAB's study, 84% of those involved in green-economy activities were participants and 5% held management roles.
Promising but fragmented models	Dana Nusantara's small grants, disbursed within 24 hours of approval and SIGAB's Disability-Inclusive Village model, linked to a 5% village-budget allocation in Rote Ndao, demonstrate accessible financing and local-budgeting features. However, these are not yet combined into a disability-inclusive climate-finance pathway, while Dana Nusantara does not yet list PwDs among its priority groups. Dana Nusantara was established with an initial commitment of approximately USD 3 million from international philanthropic donors, particularly the Ford Foundation and the David and Lucile Packard Foundation.

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Key findings	Highlight
	Launched by AMAN, KPA and WALHI, it is Indonesia's first direct funding mechanism for Indigenous Peoples and Local Communities (IPLCs), with an ambition to attract up to USD 20 million over its first five years. It is linked to the global IPLC Forest Tenure Pledge announced at COP26, through which governments and philanthropic institutions pledged USD 1.7 billion to strengthen Indigenous Peoples' and local communities' land and forest rights between 2021 and 2025.)

Source: KII and desk review

3.3 Kenya: Key findings

Key findings	Highlight
Policy-finance gap	Kenya has established a policy and institutional framework for climate action, including the Climate Change Act, the National Policy on Climate Finance and FLLoCA's county-level financing architecture. FLLoCA includes social inclusion objectives and indicators related to benefits for marginalised groups. However, disability inclusion is not consistently translated into specific financing requirements, dedicated accessibility budgets, disability-related targets or systematic outcome monitoring. General commitments to inclusion do not necessarily ensure that OPDs can access funding or influence climate resource allocation.
Upstream exclusion	FLLoCA creates opportunities for communities to participate in climate risk assessments and to prioritise local investments through ward-level structures. However, gaps remain in the timely provision of information, representation, and meaningful participation in climate governance. OPDs may learn about financing initiatives late, limiting their ability to submit applications. There is a need to establish and operationalise clear mechanisms for OPD participation in climate planning, investment prioritisation and oversight, rather than relying on 'ad hoc' consultation. Devolution creates opportunities for disability inclusion but does not guarantee it. The research identified gaps in representation and disability-related monitoring but did not establish whether the FLLoCA programme or county governments seek external support to address them.
Data invisibility	Weaknesses remain in the systematic collection and use of disability-disaggregated data across climate-finance interventions. Although FLLoCA has monitoring and reporting arrangements, disability-related participation, accessibility or beneficiary outcomes are not consistently tracked across programmes. The Lake Turkana Climate-Resilient Food Systems and Fisheries Programme, for example, identifies opportunities for young women but does not specify disability-related targets or disability-disaggregated beneficiary figures. These gaps make it difficult to determine whether climate investments reach PwDs equitably or address their specific needs.
Donor-driven inclusion	Kenya's climate-finance architecture combines government resources, county allocations and international development partner financing. FLLoCA demonstrates how national

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Key findings	Highlight
	and international resources can be channelled through devolved institutions to support locally identified priorities. However, disability inclusion remains vulnerable to inconsistent implementation where it is not embedded in mandatory financing and accountability requirements. Reliance on individual programme safeguards, donor expectations or implementing partners' approaches can result in uneven inclusion across projects. Disability inclusion therefore needs to be integrated into government financing systems and programme standards rather than treated as an optional addition.
Meso break	Organisational and procedural barriers constrain OPDs' ability to access climate finance and participate as implementing partners. Smaller organisations may lack the staff, technical expertise and financial resources needed to navigate complex application, documentation and due diligence requirements. Although county-level financing offers a potential avenue for locally rooted organisations to engage, there is no consistent pathway that enables OPDs to access climate funds, either directly or through intermediaries, on equitable terms. The absence of sufficiently resourced capacity-building and accessible funding mechanisms risks leaving OPDs dependent on other organisations to represent their interests.
Vulnerability framing	PwDs are recognised as among the groups affected by climate change and FLLoCA provides a framework for directing investments towards locally identified resilience priorities. However, there are concerns about whether this recognition translates into decision-making power for PwDs and their representative organisations. OPDs can be expected to mobilise communities, share information or contribute technical advice without being systematically positioned as co-designers, implementing partners or accountability actors. 'We are requested to mobilise communities at short notice and we bear the financial burden of communication and mobilisation but receive no stipends' The Lake Turkana case study similarly illustrates how a programme can prioritise women's livelihoods without specifying disability-inclusive participation or outcomes. Disability inclusion must therefore extend beyond beneficiary identification to representation, influence and access to resources.
Promising but fragmented models	Kenya has several promising foundations for advancing disability-inclusive climate finance. The County Climate Change Fund (CCCF) and FLLoCA model embed community participation within climate planning and public-finance systems and ward-level structures offer entry points for OPD engagement. Disability organisations can contribute technical expertise in accessibility, reasonable accommodation and inclusive programming. Partnerships between OPDs and humanitarian actors also provide opportunities to strengthen advocacy and accountability. However, these features have not yet been demonstrated to form a consistent pathway connecting OPDs to climate-finance decisions, implementation resources and monitoring across programmes. The priority is to connect these opportunities through formal OPD representation, dedicated accessibility budgets, proportionate funding requirements and disability-disaggregated monitoring.

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Source: KII and desk review

3.4 What do the three countries tell us?

In all three countries, by contrast, gender carries a tagging, marking or allocation instrument that disability lacks entirely: a marker and required assessment in Nepal, budget tagging in Indonesia and a 30% allocation requirement in Kenya.

Table 3 applies the five conditions of disability-inclusive climate finance defined in Table 1 (access, influence, control, benefit, and accountability) to the evidence from each country. Each condition is classified as required, recognised, or absent, according to the thresholds explained below the table. The gender comparator is included to show an established administrative instrument and is not a sixth condition.

Table 3: Country scorecard against the five conditions of disability-inclusive climate finance

Condition	Nepal	Indonesia	Kenya
Access	**Absent.** OPDs cannot meet fund compliance requirements. They reach finance only through routes donors have built	**Absent.** BPDLH intermediary window starts at IDR 5 billion (≈276,000 USD). Readiness support comes after selection	**Absent.** Finance reaches counties. No route carries it on to OPDs
Influence	**Recognised.** OPDs invited to CCMD consultations, with sign language. No seat on climate finance committees	**Recognised.** 5% of PwDs involved in green activities held management roles	**Recognised.** Ward structures open to residents, OPDs not systematically represented
Control	**Absent.** 80% of climate finance devolved to local level. No share decided by OPDs	**Absent nationally.** (Local precedent in Rote Ndao)	**Absent.** Counties allocate at least 1.5% of development budgets. No OPD share

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Condition	Nepal	Indonesia	Kenya
Benefit	**Recognised.** Named in the 2019 Policy (Sec 8.9), but absent from section 8.12(d), which targets climate budgets	**Recognised.** Covered under "vulnerable groups". Not a targeting criterion	**Recognised.** The FLLoCA technical assessment names PwDs among the populations the programme prioritises and the grant indicator on sectoral spend is disaggregated by the portion benefiting marginalised groups. Neither is disability-specific: there is no disability target, no disaggregated reporting and accessibility and reasonable accommodation are not named as eligible costs.
**Note: The benefit row assesses whether PwDs are identified as intended beneficiaries and whether financing and monitoring systems could determine whether benefits reach them. It does not assess whether PwDs receive a proportionate share of climate finance or outcomes.*			
Accountability	**Absent.** No disability tag or marker and no monitoring after approval	**Absent.** No disability budget tag. Disaster datasets record sex only	**Absent.** No disability-disaggregated beneficiary data
**Note: This row assesses whether disability-related expenditure, participation and outcomes can be identified through budget tags, markers or disaggregated reporting. It captures one component of accountability and does not assess other dimensions, such as grievance, redress or community oversight.*			

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Condition	Nepal	Indonesia	Kenya
Gender comparator: The instrument that exists for gender	A gender marker in the aid information system (trend data from 2016/17), gender focal points on the GEDSI Strategy committees and a required gender assessment and action plan attached to every detailed project proposal under the 2082 Procedure. No disability equivalent for any of these	Gender responsive climate budget tagging has been applied across three ministries since the 2017-2018 fiscal year. No disability equivalent	A 30% women's benefit target in the programme, appraisal document and FLLoCa Gender and Social Guidelines requiring 30% of county funding for women's adaptation and mitigation initiatives across 45 targeted counties. No disability equivalent

How the ratings are assigned

- **Required:** Disability appears in a rule that gates a financing decision. Failing it can delay, reduce or stop finance or affect eligibility, approval, disbursement or performance scoring. The instrument, the clause and the consequence can each be named;
- **Recognised:** Disability is named in policy, strategy or safeguard language that governs the financing system, but no financing decision turns on it. This includes cases where disability is covered only by an umbrella category such as vulnerable or marginalised groups; it is not linked to an identified binding financing consequence. Recognition may be acted upon in programme design or implementation or may remain unimplemented; where evidence is available, this distinction is identified in the country analysis.
- **Absent:** Disability does not appear in the instruments governing the financing decision or appears only in documents that do not govern it.

The final row is not a rating. It names the instrument that exists for gender in each country, so that the comparison rests on what is in place rather than on a classification of it.

The scorecard tests the four propositions set out in Section 1.6. All four hold across the three countries and the country evidence sharpens each one. A fifth pattern emerges that the framework did not anticipate: localisation without disability.

Recognition sits at the top of the chain. Power is allocated in the middle: Across all three countries, disability is most visible in policies, NDCs, and safeguards, but is less consistently reflected in the rules applied, for example, through proposal approval by ministries, partner selection by fund managers, and budget decisions by subnational governments. OPDs may be consulted, but they rarely have formal authority over these decisions. Further recognition at the macro level, such as another policy reference or another

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NDC paragraph, will therefore not, on its own, move finance. Advocacy has to reach meso-level actors and target the specific clause, tag, or criterion that directs funding in each system.

A commitment changes behaviour only when it carries a consequence: Each system already enforces something precise at a fixed checkpoint. In Nepal it is the 80% local-share rule, in Indonesia environmental and social due diligence and in Kenya the County Climate Resilience Investment Grant, which is performance-conditional. Its indicators require counties to spend more than 50% of the approved grant and to direct at least 60% of what they spend on climate-resilient action in institutions identified priority sectors, with the second indicator disaggregated by the share that serves marginalised groups.

The gap is one of priority, not capacity: The gender comparator is the most consistent result in the evidence. The ministries and fund managers that hold no disability requirement already run gender tags, markers, focal points and required assessments. This challenges the assumption that disability inclusion lies beyond the scope of current administrative systems, but recognises that these systems must be adapted to address disability-specific barriers. The administrative machinery is in place and it was built within the last decade for another cross-cutting priority. Gender gained these tools with a recognised UNFCCC constituency and a Gender Action Plan behind it. In Indonesia, it is secured domestically through the Ministry of Finance Regulation No.119/2009, which makes gender analysis and budget tagging mandatory in every ministry's budget process. Disability has neither, so recognition of the Disability Caucus at COP31 is a finance question, not only a process question.

Exclusion compounds and it begins before finance is visible: In Nepal and Indonesia, exclusion starts upstream, before any funding call exists. OPDs are absent when priorities and proposals are framed, readiness is tested at selection and support arrives only afterwards. Each barrier is minor on its own. Together, they mean that by the time a call exists, its scale, eligible activities and likely partners have already been set without OPDs. The pattern then confirms itself: Few OPDs apply, so funders conclude that few OPDs are capable. Because disability is not counted, none of this shows up in reporting. Women and Indigenous PwDs face these barriers twice. When participation is mediated by family members or companions, inclusion can be reported without PwDs having to exercise any choice.

> Our internal financing framework is primarily based on environmental, social and governance (ESG), in which we have incorporated some gender aspects. Certain projects financed by development partners, however, may require a separate project-level gender assessment. Hence, this project will undergo ESG assessment and additional gender assessment. However, findings from the gender assessment do not determine whether financing proceeds and there is currently no binding obligation or sanction attached to non-compliance.
>
> **- Fund Manager, Indonesia**

Research limitations and outstanding evidence gaps

The research found no case in the three countries where finance from the GCF, GEF or AF reached an OPD directly. The positive cases ran through disability-sector channels in CADiR, including Norad and the Atlas Alliance, donor-built capacity routes through DFAT in Bhimeshwor or domestic budgets in Rote Ndao. The evidence from Kenya rests mainly on county officials. The fund-level findings also rest on documents rather

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than interviews with the funds themselves, so they show what the rules provide, not how the funds would explain or apply them. These gaps do not weaken the findings. They show that the pathway from global climate funds to OPDs has not yet been built anywhere in the sample.

The components of that pathway do exist, spread across programmes and countries: A checkable commitment, a capacity bridge, OPD-led priority setting, disability-led village budgeting, fast small-grant disbursement and OPD-held data. Section 4 sets out what each contributes and what it would take to combine them.

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4. What current practice shows and what can be transferred to disability-inclusive climate finance

Across Nepal, Indonesia and Kenya, the evidence points to several practices that could be adapted to strengthen disability-inclusive climate finance. These are not presented as complete models, but as current finance, governance and delivery features with potential transferability to disability inclusion. A consistent pattern: disability inclusion advances when it is built into the administrative and financial systems that already govern climate investment, rather than added as a separate layer. The following findings show what that looks like in practice.

4.1 Nepal

A precisely defined commitment gets checked. The 80% local-disbursement rule in the 2019 Policy sets a number, sits at a point in the approval process where ministries examine it and was delivered in at least two case-study projects. Nepal therefore has proof that a verifiable financing commitment changes what ministries consider when they approve a project. This establishes a replicable model that the disability targets in NDC 3.0 could follow if they were given specific indicators and deadlines.

Existing gender tools show what a disability equivalent needs. Nepal's strategies and systems already provide for gender tagging, a gender marker in the aid information system, gender focal points and a gender assessment and action plan in every detailed proposal. The administrative capacity to attach a cross-cutting priority to proposals, budgets and committees is in place. Disability would need the same four elements: A tag, a marker, a focal point and a required assessment.

A capacity bridge can turn OPD readiness into direct access to public budgets. In Bhimeshwor, OPDs trained in proposal writing and budgeting approached a municipality and a provincial government and received funds. A donor built the route and an OPD federation delivered it, so it depended on an intermediary willing to invest in readiness. It also shows that the readiness gap can be closed.

OPD leadership of a thematic area changes who sets priorities. In CADiR, an OPD federation argued for a dedicated climate theme and now leads it. The theme is not a climate finance mechanism. It shows that OPDs can shape what donors fund when they participate in the design stage.

OPD-held data can fill gaps left by official systems. NFDN's flood mapping and portal were requested by a ministry. If OPD federations held a defined role in national climate finance monitoring, this data could inform targeting and reporting.

4.2 Indonesia

Social priorities can be integrated into financial systems. Since 2017, three ministries have applied gender-responsive climate-budget tagging, connecting a social priority to government proposals and expenditure and making related allocations visible across institutions. The system does not provide equivalent disability tracking, but it demonstrates the administrative capability to identify and monitor climate expenditure linked to a cross-cutting social priority. It also shows how a cross-cutting social priority

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can be translated from a policy commitment into identifiable expenditure, which becomes the institutional pathway disability inclusion would need to follow.

Local participation can be translated into public-resource commitments. In Indonesia, village planning, budgeting and participatory forums provide channels through which locally identified priorities can influence public expenditure. The Disability-Inclusive Village model and evidence from Rote Ndao demonstrate how disability-led data-organised representation and local regulation can move participation beyond consultation and contribute to formal budget allocations.

4.3 Kenya

Participatory climate-finance structures can provide an institutional entry point for disability inclusion. Kenya's CCCFs and the Financing Locally Led Climate Action (FLLoCA) programme connect county-level financing with ward- and community-level climate planning, providing existing structures through which OPDs can influence climate priorities and investment decisions. Ward-level participatory structures offer a practical entry point for formalising OPD representation and ensuring that disability-related priorities are reflected in investment plans and budgets. The structures exist. Institutions now need to embed disability inclusion in planning, allocation and accountability processes rather than assume it follows from participation alone.

Ring-fenced allocations and accessibility standards can translate participation into funded commitments. Kenya's 1.5% allocation precedent offers a potential reference point for considering how dedicated resources can be protected for disability inclusion, although its applicability to climate finance would need to be assessed. Similarly, the United Disabled Persons of Kenya (UDPK) public participation guidelines provide a published basis for making consultation processes more accessible to PwDs. Together, these offer practical building blocks for defining what good practice looks like: formal OPD participation in ward-level climate planning, explicit budget provisions for accessibility and reasonable accommodation and public participation processes designed to enable PwDs to contribute meaningfully. CCCF and FLLoCA implementation and monitoring arrangements must set clear requirements to translate these foundations into funded practice.

Taken together, these cases show that transferability requires adaptation of the design features they demonstrate, rather than replication of entire programmes. These include measurable commitments linked to financing decisions, capacity support prior to funding applications, formal roles for OPDs, identifiable budget allocations and accessible local plans and oversight, each adapted to the relevant institutional and financing context.

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5. Recommendations: Where can change happen and who has to act?

The evidence identifies three repeated breakpoints in disability-inclusive climate finance. First, disability inclusion is recognised in policies but is not consistently linked to financing decisions, eligibility or approval. Second, OPDs face barriers to finance, whether directly or through intermediaries, such as compliance requirements and limited support to build organisational readiness. Third, financing systems do not consistently track disability-related expenditure, participation or outcomes, which limits accountability for whether commitments are delivered. The point at which these barriers arise differs by country.

The recommendations below are organised by actors. Nine patterns recur throughout the evidence, and each recommendation addresses at least one of them.

1. **Disaggregated data.** Disability is absent from the datasets that finance relies on. Disaster records in Indonesia capture only sex, Nepal's disaster and finance sectors have no disaggregated data system and Kenya's Lake Turkana model and county programmes collect participant-level data but do not systematically track disability-disaggregated beneficiary outcomes;
2. **Monitoring, evaluation and learning.** Upward reporting templates exist and downward accountability does not. In Nepal, CCMD has no routine monitoring role and AEPC's reporting template has no disability column;
3. **Frameworks.** Disability inclusion carries weight when it binds before approval. In Indonesia, due diligence for environmental and social risks can influence a financing decision, but gender and disability assessments produce recommendations that have no binding effect on approval;
4. **Budget for staff and accommodation.** Accessibility costs often fall on participants and disability expertise is often assigned to one staff member who also covers gender and inclusion, with no dedicated disability expertise or a ring-fenced budget;
5. **Capacity.** OPDs cannot meet the compliance requirements of large funds. All three OPDs consulted in Nepal said so and in Kenya OPDs are not recognised as eligible implementing entities under FLLoCA;
6. **Mindset.** Disability is still framed in terms of vulnerability and safeguarding. Participation tends to be invited and to have little influence on decisions, as reflected in the account of the National Indigenous Disabled Self Employment Women Association (NIDSEWA) on how disability issues are handled in Nepal's climate programming;
7. **Investors' language.** Disability inclusion has no price in current financing instruments. PT Sarana Multi Infrastruktur (PT SMI)'s three bonds in Indonesia were priced identically regardless of social outcomes and Nepal's two corporate green bonds were issued under a taxonomy that does not reference disability. As transition finance grows, these instruments decide who benefits from the low-carbon shift, which makes their silence on disability a just transition gap.
8. **Business case.** Accessibility features attached to infrastructure can be financed as part of the infrastructure outcome, while a freestanding disability programme cannot. This structural asymmetry makes disability inclusion legible to investors only when it is embedded in a broader asset;

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9. **Ecosystem separation.** Disability organisations sit outside the networks that design climate programmes. In Indonesia, OPDs and environmental CSOs operate separately. In Nepal, OPDs access funding only through donor-built intermediary chains. In Kenya, climate CSOs have limited awareness of disability inclusion, which keeps OPDs outside the coalitions that shape programme design.

Priority levels. "High" means the action addresses a breakpoint confirmed in the evidence and falls within the named actor's own authority. "Medium" means it depends on another action first, rests on one country's evidence or needs resources not yet in place. Each actor also has an overall level, ranked by use.

Strength of evidence. The recommendations draw on gaps identified through the literature review and barriers reported directly by stakeholders interviewed for this study. Examples include the absence of a disability-equivalent mechanism in Indonesia's climate budget-tagging system and the three OPDs in Nepal that reported that they could not meet fund compliance requirements.[1]

The three countries illustrate different points at which disability inclusion breaks down. In Indonesia, fiduciary and accreditation thresholds constrain OPDs' access to intermediaries. In Nepal, intermediaries shape whether disability inclusion is incorporated into programme design. In Kenya, climate finance reaches counties, but mechanisms that connect it to OPDs remain limited. Across these different contexts, nine repeated patterns inform the recommendations below.

Each recommendation below relies on the same set of checkpoints because institutions enforce commitments only where they can verify them. Disability must appear in five places. The **results framework** needs a disaggregated indicator. **Appraisal** needs a costed disability inclusion assessment and plan at the concept and full-proposal stages. **Accreditation and eligibility** need a tested capacity. **Tracking systems** need a tag or marker equivalent to gender tagging. **Monitoring after approval** needs a defined role for OPDs. Without these, no recommendation can be verified, and an unmet commitment carries no consequence for approval, allocation or performance. The tables show who must act on each.

5.1 Donors: Highest overall priority

Donors can influence disability inclusion through funding conditions, programme requirements and performance expectations.

What needs to change	Who must act	Priority
Make disability requirements binding at design and approval stages, establish country-level disability reporting and define measurable criteria for "performing effectively" on inclusion. In Nepal and Indonesia, inclusion carried weight when a financier required it as a condition for approval. ICIMOD's mainstreaming followed DFAT's recommendations and PT SMI and Kemitraan adjusted practice when ADB and the World Bank required it. DFAT's 60% target has no	Bilateral and Multilateral Donors, Multilateral Development Banks	High (COP31 Priority 1)

[1] The gaps identified indicate potential entry points for action; they should not be interpreted as evidence of established demand for external support.

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What needs to change	Who must act	Priority
reporting for Nepal yet. In Kenya, embed disability measures as a formal condition in the annual performance assessment through which counties qualify for FLLoCA investment funding.		
Finance OPD readiness support before funding decisions, and resource OPDs as programme partners rather than only as beneficiary representatives. Include OPDs in programme consortia, budget for organisational capacity alongside delivery, and enable sub-grants to local organisations, such as OPDs, where funding conditions permit.	Donor country offices and headquarters, accredited entities and intermediaries (programme design and sub-granting); OPD federations (readiness and delivery)	High (COP31 Priority 4)
Coordinate disability-sector and climate-programme funding and ensure that accessibility and reasonable accommodation are eligible costs in donor-funded programmes and the relevant fund financing arrangements. Eligible costs should include interpretation, transport, accessible venues and personal assistance; participants should not bear these costs.	Donor programme teams; relevant fund boards and secretariats (financing rules); accredited entities and intermediaries (application of eligible-cost rules)	Medium (Needs coordination across programmes)

5.2 Global climate funds: High priority with longest lead time

What needs to change	Who must act	Priority
Require disability-differentiated analysis at concept and full-proposal stages, covering accessibility barriers, additional disability-related costs, reasonable accommodation budgets. Use donor representation in fund governance, contribution and replenishment decisions, and policy dialogue to advocate for binding disability-inclusion requirements in fund approval, accreditation and results frameworks. For the FRLD and locally led financing windows still under development, press for disability inclusion to be built into operating rules before they are finalised.	GCF Board and Secretariat, AF Board, GEF Council and donor contributors to the FRLD	High (COP31 Priority 1)
Explicitly name disability in safeguard policies and make disability inclusion capacity a formal accreditation condition. The GCF's overarching Environmental and Social	GCF Board and Accreditation Panel,	High (COP31 Priority 2)

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What needs to change	Who must act	Priority
Policy does not explicitly mention disability, although its adopted interim safeguards (the IFC Performance Standards) include disability within broader provisions on vulnerability and non-discrimination. AF accreditation requires demonstrated gender safeguard capacity but has no comparable disability-specific requirement. The GCF's development of its own safeguards creates an opportunity to embed disability more directly.	AF Board and Accreditation Panel	
Embed disability inclusion in the loss and damage fund while its modalities are still being shaped. It covers disaggregated data requirements, formal OPD participation and recognition of the non-economic costs that PwDs disproportionately bear, for which a study led by the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) and currently under examination by ICIMOD provides an evidence base.	Board of the FRLD	High (COP31 Priority 3)
Require meaningful participation by OPD in project design and governance. Introduce proportionate access pathways with simplified windows for small locally led actors and reimbursable application costs. The compliance burden is a documented barrier: AEPC reported about 1.5 years for GCF accreditation and Indonesian organisations reported unrecoverable application costs that function as a de facto exclusion mechanism for OPDs.	Fund Boards, national designated authorities for country programmes	Medium (Needs the first two rows in place)

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5.3 National government: High priority where authority is concentrated, as in Nepal

What needs to change	Who must act	Priority
Nepal, Ministry of Finance. Translate the 2082 Procedure's broad "inclusion" criterion into a defined disability criterion. Add a disability inclusion assessment and plan to the detailed proposal attachments, place alongside the gender assessment as an equivalent requirement, not an optional annex. Make the application process accessible and allocate funding to and formally reserve OPD seats on the Steering and Technical Committees.	Ministry of Finance, International Economic Relations and Cooperation Coordination Division (IERD), which issued the Procedure under its own authority	High
Extend existing gender-tracking tools to include disability across all three countries. Nepal: Add a disability marker in the aid information system, a disability tag in the Climate Change Budget Code (the Policy already calls for modifying it, Section 8.12(c)) and disaggregated fields on the digital platform required by Section 21. Indonesia: Extend the gender-responsive climate tag, in use across three ministries since 2017-2018, to include disability criteria for domestic climate spending, which is more than four times international inflows. Kenya: Require disability-disaggregated monitoring of county grants and beneficiaries.	Nepal: Ministry of Finance Indonesia: Ministry of Finance, Badan Perencanaan Pembangunan Nasional (BAPPENAS) and the ministries that operate the tag Kenya: National Treasury	High (COP31 Priority 5)
Nepal, Ministry of Agriculture, Forest and Environment. Add a disability focal point and an OPD seat to the GEDSI Strategy committees. Build disaggregation into vulnerability assessments and LAPA planning using the NDC 3.0 GEDSI targets and include disability explicitly in the GEDSI and just transition impact assessment that NDC 3.0 commits to. Extend monitoring to approved projects whose endorsement included disability criteria. Give OPDs a standing consultative role. Amend Section 8.12(d) of the National Climate Change Policy during its current revision to name disability.	Ministry of Agriculture, Forests and Environment (MoAFE) and CCMD	High (revision window open)
Kenya. Use the County Climate Change Funds and FLLoCA as the entry point in place of a new mechanism, which extends the existing gender and social guidelines rather than creating a parallel disability instrument.	National Treasury (FLLoCA programme implementation unit), Climate Change Directorate	High

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What needs to change	Who must act	Priority
Route to support: County governments would be the primary recipients of support, with county OPDs and the UDPK as partners. Changes to the performance assessment would need to be authorised through FLLoCA programme arrangements under the National Treasury. Potential financing could include development-partner contributions to FLLoCA, as the report identifies international grants as a source of programme design, technical assistance, and readiness support in Kenya. Delivery could involve UDPK and county OPDs.		
Nepal. Name disability in the next revision of the Green Finance Taxonomy. The inclusion principle in the current taxonomy names gender only. Adding disability would align the taxonomy with the NDC 3.0 GEDSI commitments and establish a financing signal for the private sector.	Nepal Rastra Bank	Medium

5.4 Accredited entities and intermediaries: High priority as discretion sits here

What needs to change	Who must act	Priority
Convert references to disability inclusion into binding, scored and reported requirements. **AEPC**: As Nepal's principal channel for clean energy finance, where just transition commitments become concrete, populate and report the disability data its SECF portal collects, add the disability column that its 2019 guideline template lacks and score disability as a distinct, weighted element of its disadvantaged-groups criterion. **PT SMI**: make disability inclusion a precondition of eligibility in its catalytic product. Conditions applied after signing carry no leverage. **BPDLH**: retain a disability element in the safeguard pillars that apply by default, since donor-by-donor discretion will otherwise exclude it	AEPC, PT SMI, BPDLH	High (COP31 Priorities 1 and 2)
Use the projects now being shaped to write disability inclusion plans in at design. As of the Resilience, Adaptation and Inclusion in Nepal (RAIN) programme's January 2026 review, these were NTNC's USD 10 million GCF proposal (concept note approved by	NTNC, NIMB, AEPC, the Ministry of	High (Window open)

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What needs to change	Who must act	Priority
the Ministry of Finance and GCF), NIMB's concept note for a Nepal Climate Financing Facility, discussion of an AEPC loss and damage proposal and ADB's Green and Resilient Financing Facility, expected to go live in 2027. **Route to support:** NTNC, NIMB, and AEPC would be potential recipients of support as proposal developers. The Ministry of Finance, as the NDA, could provide an entry point to incorporate disability inclusion into proposals at endorsement. Potential funding routes include GCF readiness or project-preparation funding, subject to eligibility and approval, or support through a programme partner such as FCDO's RAIN programme, which tracked this pipeline in its January 2026 review. NFDN could serve as a delivery partner for disability inclusion. The specific arrangements to commission and fund this support would need confirmation.	Finance as NDA, ADB	
Formalise OPDs as implementation and knowledge partners across the programme cycle, not only as consultees or beneficiary representatives at the end of it. Apply disability-inclusive sub-granting criteria and proportionate due diligence paired with organisational support, so that readiness is built before selection. BPDLH's community windows are described as direct and free of charge, with applicant readiness as the binding constraint, which shows that the access barrier is organisational rather than structural and therefore closeable. **Route to support (Indonesia):** BPDLH's accredited intermediaries and their OPD partners, such as SIGAB, would be potential recipients of readiness support before selection. BPDLH could provide an institutional entry point through the design of its funding windows. As safeguards vary according to donor requirements, the donors that finance these windows could be potential funders, and civil-society intermediaries such as Kemitraan could support delivery. The specific arrangements to commission and fund this support would need confirmation.	Intermediaries with civil society mandates (Kemitraan, BPDLH's accredited intermediaries, Dana Nusantara, ICIMOD, NTNC) and implementing entities in Kenya	High (COP31 Priority 4)
Assign dedicated disability expertise and a ring-fenced budget for reasonable accommodation, separate from gender and general inclusion portfolios. Disability spans impairment types that one gender-and-inclusion staff member cannot cover without specialist support and adequate resourcing.	Boards and management of accredited entities	Medium (Needs donor funding)

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5.5 OPDs and civil society: High priority but dependent on support from the actors above

What needs to change	Who must act	Priority
Build funding readiness as a precondition for direct climate access, covering financial governance, proposal writing and fund management. The Bhimeshwor shows that these skills open municipal and provincial budgets: OPDs that successfully completed readiness training accessed public funds and directed them toward priorities and market access. The same route could carry climate-related funds once OPDs are ready and intermediaries create the pathway.	OPD federations (NFDN, SIGAB, UDPK) with intermediaries	High
Claim formal standing roles and use OPD-held data as institutional leverage. Ask for the committee seats named above and offer data to ministries and funds, as NFDN's portal did after the Ministry of Women's request. The data already exists. The missing step is formalising OPDs' role to supply it.	OPD federations and county-level OPDs	High (COP31 Priority 5)
Enter climate and environmental networks before programme proposals are designed, not after. Bring a business case framed in investors' terms: resilience outcomes, reduced risk exposure and cost-effectiveness of disability-inclusive design.	OPD federations with climate CSOs, Christian Blind Mission (CBM) Global Disability Inclusion and researchers	Medium
Systematically document disability-led climate action (NFDN's climate theme and portal, SIGAB's village model) to shift institutional perceptions from vulnerability to agency. Over time, federations with demonstrated capacity could advise ministries and funds directly	OPD federations and CBM Global	Medium

5.6 Local government: Medium priority

Strong precedent but thin evidence

What needs to change	Who must act	Priority
Give OPDs formal seats where local priorities are set, not as observers, but as participants with defined roles. This means ward and community climate planning under the County Climate Change Funds in Kenya and LAPA planning and local disaster management committees in Nepal.	County assemblies and ward committees (Kenya), municipal and provincial	High

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What needs to change	Who must act	Priority
Without formal representation at the point where institutions identify priorities, OPD participation remains invitation-based and carries no structural weight.	governments (Nepal)	
Build local disability data from the Census and OPD mapping. Indonesian fund managers found no regency-level disability data and NFDN's flood mapping shows what OPDs can produce. Local governments are the natural home for this data and the logical counterpart to OPD data-sharing.	Local governments with OPD federations	High (COP31 Priority 5)
Ring-fence a budget share and make accessibility an eligible cost at local level. Rote Ndao village in Indonesia allocates 5% to disability programmes under local regulation and Kenyan counties set access conditions through county legislation. These are replicable models, not exceptional cases. In Nepal, grant conditions for provincial and local implementation can include disability inclusion and RAIN plans to advocate for local budgets for screening camps and for mobility and assistive devices. The precedents are sufficient to act on. National policy needs to normalise them rather than leave them isolated.	Municipal and provincial assemblies, county assemblies, the Ministry of Finance for Nepal's grant conditions	Medium (Rests on isolated precedents)

Support. NFDN's provincial structures, county-level OPDs and UDPK in Kenya and the Bhimeshwor training model.

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6. From evidence to systems change and impact: Priorities for COP31 and beyond

Disability is named in policy at every level of the chain. In none of the three countries is any of the five conditions rated Required for disability. The evidence therefore points to a narrow ask: attach one checkable disability condition to a point where each system already enforces something. That might be a results framework, an accreditation standard, a fund's operating rules, a sub-granting design or a tracking system. Several of these remain under development. The priorities identify where advocacy can influence system change: The first three focus on fund boards and donors, where COP31 provides leverage, while the last three focus on intermediaries and national governments, which can act sooner. Progress should be assessed by whether disability inclusion is incorporated into financing rules and procedures, and whether this improves OPD participation, access to resources and accountability outcomes.

The first three priorities focus on fund-board and donor decisions that COP31 advocacy can influence; the remaining three require follow-through through separate intermediary and national or county government processes.

Priority 1: Embed disability as a performance indicator, not a safeguard

Across the three funds, disability-related considerations are primarily located within safeguard and risk-management arrangements rather than in results frameworks. GEF and AF explicitly name disability in their own safeguards, while GCF relies on the IFC Performance Standards adopted as its interim safeguards. None of the reviewed results frameworks contains a disability-specific indicator. By contrast, the GCF tracks gender-disaggregated impact data. A safeguard checks that a project avoided harm. A performance indicator checks who benefited and leaving disability out of it keeps exclusion out of view. Where a financier made disability inclusion a condition of approval, practice changed. ICIMOD's mainstreaming followed DFAT's recommendations and Indonesian fund managers applied inclusion requirements on ADB and World Bank projects. Funds should therefore require a disability-disaggregated indicator and a costed inclusion plan at concept and approval stage, matching what they already ask of proposals on gender. Donors should report their own disability targets by country.

Who acts*:* GCF Board and Secretariat, AF Board, GEF Council, DFAT, Foreign, Commonwealth & Development Office (FCDO), Norad and multilateral development banks, including ADB and the World Bank.

Window: the GCF LLCA Framework, the AF's locally led windows, both entering operation. The GEF-9 replenishment has concluded, and the programme is now underway.

Priority 2: Require disability inclusion capacity in accreditation standards

The AF accreditation requires demonstrated gender safeguard capacity but has no comparable disability-specific criterion. The GCF's overarching Environmental and Social Policy does not explicitly mention disability, although the IFC Performance Standards, adopted as its interim safeguards, refer to disability in broader vulnerability and non-discrimination provisions. Accredited entities subsequently select partners and establish sub-granting requirements. Requirements that accreditation does assess are therefore unlikely

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to apply consistently downstream. Accreditation is the point where the system tests organisational practice before granting access to public finance. The Boards should name disability in safeguard policies and test disability-inclusion capacity at accreditation and re-accreditation, including how an entity involves OPDs and budgets for accessibility.

Who acts: The GCF and AF boards and their accreditation panels.

Window: The GCF is developing its own safeguard standard. This is the single clearest near-term entry point for embedding disability and the standard is not yet finalised.

Priority 3: Write disability into the funds and windows under development, starting with FRLD and the locally led windows

The FRLD continues to develop its operating modalities, while the GCF's LLCA Framework, the AF's locally led windows and GEF-9 are entering operation. At these points, decision-makers can still write disability into the rules before they harden. Once funds set the modalities, retrofitting becomes slow and politically costly. The window is now.

The locally led route has the firmest basis. The Principles for LLA name PwDs and the AF board have endorsed them. The gap extends beyond principle to application.

For FRLD, CRPD Article 11 identifies loss and damage finance as a primary means of protecting PwDs in disasters and a UN Women-led study, as ICIMOD noted, examines the non-economic costs they bear. Loss and damage finance is the clearest expression of climate justice in the architecture: it responds to harm that the most affected did not cause. Excluding PwDs from its rules would repeat, inside the fund built on that principle, the exclusion it exists to address.

Each fund should require disaggregated data, OPD participation in governance and accessibility as an eligible cost in its operating guidance.

Who acts: FRLD Board, GCF Board, AF board, GEF Council.

Priority 4: Use intermediaries with civil society mandates as disability access bridges at country level

Across all three countries, no GCF, GEF or AF money reached an OPD directly. The routes that worked ran through intermediaries. In Bhimeshwor, DFAT funded capacity building through The Asia Foundation and NFDN and the OPDs then secured municipal and provincial funds. In CADiR, NFDN argued for a dedicated theme on climate adaptation and disaster risk reduction and now leads it. Dana Nusantara reportedly disburses small grants within 24 hours of approval. These cases show that the access barrier reflects a design choice by intermediaries rather than a structural constraint.

The barrier is documented and consistent: All three OPDs consulted in Nepal said they cannot meet global fund compliance requirements, and in Indonesia, readiness support generally arrives after selection, after OPDs have already been excluded. Intermediaries with civil society should write disability-inclusive sub-granting criteria into their programme designs as standard requirements. That means proportionate due diligence and readiness support before selection, OPDs engaged as co-designers and implementing partners and accessibility costs eligible for funding.

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Who acts: Fund managers, ICIMOD, NTNC and BPDLH's intermediaries, with donors who pay for readiness.

Window: Proposals being shaped as of early 2026, including NTNC's GCF proposal and NIMB's climate financing facility concept in Nepal.

Priority 5: Make OPDs visible in national climate finance monitoring

Systems in all three countries systematically fail to count disability. Nepal has no disability tag or marker and neither the approving ministry nor the disability outcomes are tracked after approval. Indonesia has tagged gender-responsive climate spending in three ministries since 2017with no disability equivalent and its emergency datasets often record sex but not disability. Kenya does not consistently track disability among beneficiaries. In each country, the tracking infrastructure that carries gender has no counterpart for disability. The capability exists and decision-makers have not made the political decision to apply it.

OPDs hold data that official systems lack: After the recent floods, Nepal's Ministry of Women turned to NFDN for it. National tracking systems should require disability-disaggregated data, extending the tags and markers that already carry gender. OPD federations should also have a defined monitoring role, as provided in CRPD Articles 31 and 33(3).

Who acts: The Ministries of Finance in Nepal and Indonesia, The Ministry of Planning and Development of Indonesia and Kenya's National Treasury.

Window: Nepal's National Climate Change Policy is under revision, which allows revisions to Section 8.12(d) and the climate budget code.

Priority 6: Give OPDs a formal seat and a ring-fenced share where climate finance decisions are made

OPDs are consulted after decisions are shaped and excluded from the bodies that shape them. In Nepal, the Steering and Technical Committees under the 2082 Procedure include no OPD representative, and the GEDSI Strategy's committees have gender focal points but no disability focal point. In Nepal, 80% of local share and Kenya's county funds reach local government without a mechanism to channel resources to OPDs.

The evidence shows what a defined role produces when institutions provide it. Rote Ndao shows what a defined role can produce: A district regulation and a reported 5% village-budget allocation followed disability-led village organising. Climate finance committees and local planning structures should reserve OPD seats and fund participation costs. Both measures should serve as non-negotiable design requirements rather than optional additions subject to committee discretion. General Comment No. 7 requires meaningful participation with support. Where decisions sit with local bodies, a share of resources should include a ring-fenced allocation. Follow-up should assess how entities apply these requirements in practice. Lessons from implementation and monitoring should inform subsequent accreditation and re-accreditation decisions.

Who acts: Federal, municipal and provincial governments in Nepal. County assemblies and ward committees in Kenya.

Window: Nepal's Policy revision and the 2082 Procedure.

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Beyond COP31

Twelve months after the 31st Conference of the Parties (COP31), would mean that disability inclusion becomes a requirement rather than simply a recognised priority. Three markers would show it. At least one global fund would have taken a formal step to name disability in its safeguard standard or a locally led window, such as a draft or board decision that adds a disaggregated indicator and a costed inclusion plan to its approval requirements. At least one national government would have begun extending an existing gender tag or marker to disability. And at least one intermediary would pilot a disability-inclusive route to OPDs that combines components now found in separate programmes. If none of these has started, disability will continue to be recognised but will not become a requirement.

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Annexure

Annex 1: Global fund architecture

The Global Climate Finance Architecture is characterised by multiple overlapping channels and a lack of consistent accounting and tracking across them, making the pathway from international commitments to local delivery difficult to trace. For this review, the focus is therefore not only on where finance is allocated, but on how it moves through the system, where authority over access and allocation sits and where opportunities or barriers emerge for local actors. The analysis focuses on the **GCF**, **GEF** and **AF** as the three funds selected for this review. They provide useful variation in how climate finance is governed and accessed, particularly in relation to accreditation, direct access, intermediary roles, national ownership and the devolution of decision-making.

Taken together, the three funds allow the review to compare different pathways rather than different institutions:

Table 1.1 Analytical framework for tracing climate finance pathways

Fund	Analytical pathway of interest	What the comparison allows us to examine
GCF	A major mitigation and adaptation financing mechanism with national and direct/enhanced-direct access pathways.	How large-scale global finance moves through national institutions and Accredited Entities. Where accreditation, intermediation and decision-making shape access. And whether direct or enhanced-direct access creates meaningful routes towards local actors.
GEF	Provides a contrasting architecture, with mainstream funding channelled largely through GEF Agencies alongside the SGP as a more localised CSO or community funding pathway.	How different levels of intermediation affect access. What dedicated small-grant pathways enable that mainstream financing may not. And whether explicit disability-inclusion provisions translate into operational requirements and resource allocation.
Adaptation Fund	Provides a distinct adaptation-focused, direct-access architecture with a strong basis for examining national ownership and downstream devolution.	Whether direct access translates into downstream local access and decision-making power and what the evolution towards LLA and enhanced direct access reveals about where finance and authority can be devolved within the financing chain.

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Annex 2: Nepal, Indonesia and Kenya country assessment

The table below maps the formal financing pathway for the GCF, GEF and AF across the three study countries. It establishes the institutional architecture of access before the following sections examine what this architecture means for local participation, decision-making and disability inclusion.

2.1 Table: Global-to-national climate finance pathways: GCF in Kenya, Indonesia and Nepal

GCF				
Country	**Designated national authority or focal point**	**Access modality used**	**Named national direct access or accredited entities**	**Executing or delivery layer to local actors**
Nepal	Ministry of Finance, IERD, as NDA. Provides country endorsement/no-objection	Direct Access through Nepali national Direct Access Entities	National Direct Access Entities: AEPC, NTNC, NIMB, Town Development Fund (TDF, accredited July 2026)	Direct Access Entity → National executing/implementing partners → Local implementing partners → Communities
Indonesia	Ministry of Finance as GCF NDA, with Ministry of National Development Planning (BAPPENAS) coordinating project pipeline development	Direct access through Indonesian Accredited Entities and projects may also be accessed through international Accredited Entities	National Direct Access Entities: • PT SMI • Kemitraan • PT Indonesia Infrastructure Finance	Accredited Entity → National Executing Entities/Financial Intermediaries → Local Implementing Partners → Communities
Kenya	The National Treasury	Direct access through Kenyan national accredited entities and international access through internationally accredited entities	National Environment Management Authority (NEMA), KCB Bank Kenya Limited	Direct Access Entity → National executing/implementing partners (Sectoral agencies/CSOs and non-governmental organisations (NGOs)) → County Governments → Communities

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2.2. Table: Global-to-national climate finance pathways: GEF in Kenya, Indonesia and Nepal

GEF				
Country	**Country gatekeeper**	**Access modality used**	**Named access/ intermediary entity**	**Executing/delivery layer to local actors**
Nepal	International Economic Relations Division (IERD), Ministry of Finance, as GEF OFP. Endorses national project proposals and programming priorities	Funding is accessed through accredited GEF agencies. GEF does not use a national direct-access model in Nepal	Not applicable as a national accredited access entity. Agencies active in Nepal include United Nations Development Programme (UNDP), World Bank, Food and Agriculture Organisation (FAO) of the United Nations, ADB, International Union for Conservation of Nature (IUCN), World Wildlife Fund (WWF)	GEF Agency → National executing ministry/agency or project management unit → Subnational government and local implementing partners → Communities (The GEF SGP, active in Nepal since 1992 and implemented by UNDP, provides an additional, shorter route running directly to CSOs and community-based organisations, bypassing the standard agency-mediated layer)
Indonesia	Ministry of Environment and Forestry (Kementerian Lingkungan Hidup dan Kehutanan — KLHK), as GEF OFP. Endorses national project proposals and programming priorities	Funding is accessed through accredited GEF agencies, as GEF does not use a national direct-access model	Not applicable as a national accredited access entity. Agencies used in Indonesia include: • UNDP • FAO • United Nations Environment Programme (UNEP) • World Bank • ADB • International Fund for Agricultural Development (IFAD) • United Nations Industrial	GEF Agency → National Executing Ministry/Agency or Project Management Unit → Subnational Government and Local Implementing Partners → Communities

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GEF				
Country	**Country gatekeeper**	**Access modality used**	**Named access/ intermediary entity**	**Executing/delivery layer to local actors**
			Development Organization (UNIDO) • IUCN • Conservation International	
Kenya	Principal Secretary, State Department for Environment and Climate Change as the OFP, or Cabinet Secretary, Ministry of Environment, Climate Change and Forestry as the Political Focal Point	Funding is accessed through accredited implementing agencies, as there is no direct access	The active accredited implementing agencies in Kenya are UNEP, UNDP, World Bank, IUCN, Conservation International and FAO	OFP → Implementing Agency → Executing Agency (sectoral ministry, NGO, community-based organisation (CBO) or the United Nations Office for Project Services (UNOPS) for SGP) → Communities

2.3. Table: Global-to-national climate finance pathways: AF in Kenya, Indonesia and Nepal

AF				
Country	**Country gatekeeper**	**Access modality used**	**Named national direct access/ accredited entities**	**Executing/delivery layer to local actors**
Nepal	Ministry of Agriculture, Forests and Environment (MoAFE), as Designated Authority (DA). Endorses accreditation applications and project proposals	Direct access through Nepal's National Implementing Entity	National implementing entities: 1. NTNC 2. Local Initiatives for Biodiversity, Research and Development (LI-BIRD) Regional implementing agency: ICIMOD (Kathmandu-based) serving the wider Hindu Kush Himalaya region.	National Implementing Entity (NTNC or LI-BIRD) → Project-specific local executing partners → Communities. Or, for directly implemented projects: AF → International/UN implementing organisation (e.g., WFP) → Local

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AF				
Country	**Country gatekeeper**	**Access modality used**	**Named national direct access/ accredited entities**	**Executing/delivery layer to local actors**
			Separately, international organisations such as the World Food Programme (WFP) have received AF funds and implemented directly, without national accreditation, under "On Budget Off Treasury" arrangements with MoAFE as executing agency.	implementing partners → Communities, with MoAFE retaining executing-agency and budgetary oversight (Ministry of Finance (MoF) also has budgetary oversight)
Indonesia	KLHK/Environmental Protection Agency, as DA. Endorses accreditation applications and project proposals	Primarily Direct Access through Indonesia's National Implementing Entities	Accredited national implementing entities: • Kemitraan	National Implementing Entity → Project-Specific Local Executing Partners → Communities
Kenya	Designated Authority is the Ministry of Environment, Climate Change and Forestry	Direct Access through the National Implementing Entity	NEMA	OFP → Implementing Agency → Executing Agency (sectoral ministry, NGO, CBO or UNOPS for SGP) → Communities National Implementing Entity → Local Implementing Partners → Communities

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Annex 3: Country evidence

1. Nepal

Disability is recognised in Nepal's climate-policy framework, but this recognition is not consistently reflected in the provisions governing resource allocation. Section 8.9 of the 2019 National Climate Change Policy lists persons with all forms of disability among the groups whose concerns are to be addressed and commits to better access to climate information for people with disability. Section 8.12(d), which governs how climate budgets are targeted, names women, minorities, backward classes, climate-affected areas and vulnerable communities. Disability does not appear in it. NDC 3.0 has a dedicated GEDSI section with targets on institutional strengthening, capacity building and data disaggregation and it promises a GEDSI and just transition impact assessment. The sources reviewed show no budget line or tracking mechanism attached to these targets. The Forest and Environment Sector GEDSI Strategy (2082 to 2091 BS) names PwDs in its vision, goal and objectives. Its problem analysis notes that no disaggregated data system exists across the sector's institutions, that PwDs share forest-sector benefits unequally, that offices and vehicles are not disability-friendly, and that their representation in leadership is very low.

National approval processes do not consistently translate disability-related commitments into binding financing conditions. All external climate finance passes through the IERD for approval. The Ministry endorses GCF proposals directly, after a Technical Committee review that involves the line ministries and technical experts. For AF and GEF proposals, CCMD reviews the proposal first, forwards it to the Ministry of Finance and gives its own go-ahead only after the Ministry has approved it. The Ministry of Finance described its priority as raising the total volume of climate finance that Nepal receives, a goal that lengthy procedures routinely delay. It checks fund size, the share of money that reaches the project and administrative costs. It also said that disability is not a significant consideration in practice, while gender and Indigenous issues receive considerably more attention. CCMD's approval criteria do include disability, reflecting its GEDSI policies, but CCMD only recommends and the fund decides. CCMD has no routine monitoring role, particularly for AF projects, where reporting goes directly to the fund unless the fund asks otherwise or the ministry is itself the implementing agency.

A precisely defined commitment does get checked. The 2019 Policy requires at least 80% of climate finance to reach the local level (Section 8.12(b)). The ministries consider this when they approve projects and a government assessment found it was met in at least two case-study projects. No commitment on disability has comparable precision.

Governance bodies have a seat for gender and none for disability. Between them, the Climate Finance Steering Committee and Technical Committee created under the 2082 Procedure include ministries, Nepal Rastra Bank, the private sector federation, municipal associations and the NGO Federation. The Technical Committee also includes two nominated experts, one of whom must be a woman. No OPD holds a seat and none is reserved for disability. The sector's GEDSI Strategy follows the same pattern. Its Steering Committee includes named gender focal points and its Implementation Committee is built entirely from the network of gender focal points across departments and development partners. Neither body has a disability focal point. The asymmetry runs through the tools as well. The 2020 Climate Change gender equality and social inclusion (GESI) Strategy, dated 2077 BS, called for gender tagging to be institutionalised alongside climate tagging. Nepal's aid information system reports by gender marker and provides trend data from 2016/17, while the 2082 Procedure requires a gender assessment and action plan as attachments to every detailed project

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proposal. The review found no equivalent disability tool. ICIMOD described the same pattern at the AF level, where a newly launched regional initiative is dedicated to gender action plan implementation and has no disability counterpart.

Participation has widened, but OPDs report that it carries little influence. CCMD has begun inviting OPDs and researchers to policy discussions and arranging sign language interpretation, a change that NFDN confirmed independently. A representative of NIDSEWA, however, described this kind of participation, when government bodies call OPDs in, as largely tokenistic. The gap between recognition and experience is wide at community level. Humanity & Inclusion's 2023 survey of PwDs in Nepal found that 85% were unaware of early warning systems, 80% lacked access to fully accessible shelters, 70% had no access to emergency cash after a disaster and 80% had never taken part in a local climate discussion.

The OPDs consulted reported being unable to meet the fiduciary and compliance requirements for direct access to the global funds reviewed. All three OPD interviewees said that OPDs lack the capacity to access the GCF, the GEF, or the AF directly. ICIMOD, an established regional entity, described the AF's evidence requirements, such as safeguarding documentation, minutes of management meetings and incident report numbers, as heavy and said the compliance burden is very cumbersome for OPDs. AEPC described about 1.5 years to secure GCF accreditation and 1 to 1.5 years from proposal to funds. Disability funding is also kept apart from climate funding. UN1FY Nepal/Nepal Water Conservation Foundation (NWCF) reported that climate organisations that are not disability-specific struggle to include disability-focused projects in their proposals because bilateral, multilateral and philanthropic funding for disability tends to be earmarked for OPDs. All three OPDs added that PwDs start from a lower capacity base, because disability often combines with other disadvantages such as being a woman or Indigenous, so capacity-building has to come before access.

The donor mandate currently drives practice more than national policy does. FCDO's RAIN programme does not treat disability as a design criterion. It works with PwDs when they are present in a chosen project area and FCDO said that more deliberate attention is now being given to project formation. Where RAIN has built inclusion into delivery, it reports results, including disability screening linked to registration and social security referral and sign language video alerts during the 2025 floods. Neither RAIN's community disaster management committees nor its screening pathway has a named OPD partner or a reserved disability seat. DFAT has set a portfolio-wide target of 60% of investments performing effectively on disability equity by 2026, rising to 70% by 2030 and described disability as a major cross-cutting issue in its Nepal governance and climate work. The clearest case of a donor shaping practice is ICIMOD. Its DFAT-funded work in 28 municipalities of the Koshi River basin now mainstreams disability into disaster risk reduction policy, nature-based solutions, entrepreneurship and a shift from gender-responsive to GEDSI-responsive budgeting and ICIMOD attributed this directly to DFAT's recommendations. It engaged 22 organisations described as OPDs in this work. ICIMOD has also acted without a donor requirement. It completed a regional study that maps disability status against disaster data across four countries, funded by its core funds and it is due for publication on 3 December. Its own recommendation is that GCF and AF compliance requirements should include disaggregated data, gender-responsive budgeting and disability inclusion plans, which implies that no such requirement exists today.

Where OPDs have secured finance, it followed a deliberately built route. Two examples show different routes and neither runs through a global fund. In Bhimeshwor Municipality, under DFAT's Sub-National Governance Programme, capacity-building passed from DFAT to The Asia Foundation and then to NFDN, which trained OPDs in proposal writing, budgeting and presentation. The OPDs then approached the

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municipality directly and obtained funding and separately reached Bagmati Province and obtained funding there. The money came from municipal and provincial budgets and the interview did not establish whether it was used for climate activities. In CADiR, a Norad-funded consortium of four Nepali partners, climate was first proposed as a cross-cutting issue to be folded into the other thematic areas. NFDN argued with the donor for a dedicated theme. The donor had agreed, the theme was created and NFDN was chosen to lead it. The Nepal Association of the Blind later joined as deputy lead. The theme runs from 2025 to 2029 across all seven provinces. It trains OPD members, caregivers and humanitarian responders and advocates for OPD seats on local disaster management committees. It is funded through disability-sector channels, including Norad, the Atlas Alliance and Norwegian partner organisations. It does not control or channel climate finance and its effect depends on whether government bodies respond to its advocacy.

OPD federations hold disability data that official systems lack. After the recent floods, the Ministry of Women asked NFDN for disability data to support relief. NFDN maps affected PwDs through its staff in the affected areas, with the most recent Census as a reference and it has launched a Disability Inclusive Disaster and Emergency Information Portal. The portal combines a reporting form for PwDs, a live status dashboard and emergency contacts. Nepal's 2021 Vulnerability and Risk Assessment for the GESI, livelihoods and socio-economic sector also uses disability as a named indicator in its vulnerability index, alongside age, sex and population density. These examples show that data can be produced. The GEDSI Strategy records that no sector-wide system exists to hold it, so a ministry in need of disability data turned to an OPD federation. NFDN's role here is informal. No OPD holds a seat on the committees that govern climate finance, or any formal role in project selection.

Taken together, exclusion in Nepal is cumulative and the components of a better pathway already exist. Disability is recognised in policy, but the clauses that direct money omit it. The ministries that approve proposals check volume, procedure and the local share. Governance bodies and tools make room for gender and none for disability. OPDs cannot meet the compliance bar of the global funds and the disability money they can reach sits in separate channels. The Nepal evidence also contains a numeric commitment that was checked and delivered, namely the 80% local share, a donor target that shapes intermediary practice, an OPD-led thematic area, a route that gave OPDs access to local budgets and OPD-held data in an emergency. These pieces sit in different programmes. No single pathway combines them.

2. Indonesia

Disability remains peripheral to the domestic climate-finance system. Indonesia mobilised approximately USD 10.4 billion annually from domestic sources between 2015 and 2019, more than four times the USD 2.4 billion received from international sources. Yet domestic climate-budget tagging and expenditure tracking do not systematically reflect disability inclusion. This creates a significant institutional gap. While external financing requirements can create specific entry points for disability inclusion, the evidence reviewed does not establish a comparable, systematic mechanism for identifying and tracking disability-inclusive expenditure across domestic climate finance.

Formal inclusion commitments in Indonesia exist but remain weakly connected to financial authority. Law No. 8 of 2016 establishes equal rights and opportunities for PwDs, including accessibility and reasonable accommodation. National and regional disability action plans and regulations further recognize these rights, while Indonesia's Second NDC calls for accessible information and participation by vulnerable groups, including PwDs. Government Regulation No. 70 of 2019 also establishes seven strategic objectives for PwDs under the BAPPENAS coordination. However, within its disaster-related framing, PwDs are recognised

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primarily as participants in disaster risk mitigation rather than as actors with explicit authority over priority setting and resource allocation.

The contrast with gender is particularly instructive. A combined gender-responsive climate budget tag has operated across three ministries, namely the Ministry of Energy and Mineral Resources, the Ministry of Transportation and the Ministry of Environment and Forestry, since the 2017-2018 fiscal year, including provisions that allow expenditure benefiting women with disabilities to be identified. Disability is nevertheless incorporated into the broad categories of gender inequality or vulnerable groups rather than as a distinct tag. No equivalent mechanism systematically identifies expenditure intended to advance disability inclusion.

This absence is consequential. Without disability-responsive budget tagging, decision-makers cannot readily determine how much climate expenditure supports PwDs, where it is allocated or whether it reaches them. Disability, therefore, remains institutionally recognised but is difficult to trace in financial terms.

Exclusion begins before funding opportunities are available. Evidence from KII with OPDs and CSOs indicates that PwDs are rarely involved in the upstream processes through which climate priorities, programmes and funding opportunities are defined. A study by SIGAB reported very limited involvement of OPDs in government discussions on climate policy and finance, with only 31% of PwDs having participated in environmental and green-economy activities. Among those involved, 84% participated as activity participants, while only 5% held management roles.

These findings distinguish participation from influence. PwDs may be present in an activity without holding authority over programme design, budgets or implementation. Although government guidance on climate finance recognises that PwDs should be active agents rather than passive "victims", evidence indicates that this principle has not been consistently translated into financing governance.

This is not simply an information deficit. It indicates a wider ecosystem disconnect. Evidence from KII indicated that OPDs and environmental organisations frequently operate through separate networks, meaning disability perspectives may be absent when partners negotiate priorities and design proposals. By the time a funding opportunity becomes visible, its technical framing, institutional roles and eligible activities may already have been established without OPD participation.

This produces a self-reinforcing cycle. Limited participation reduces the visibility of disability-related climate needs. Low visibility reduces the likelihood that programmes or funding criteria will address those needs. And the absence of relevant opportunities further limits OPDs' experience and influence within the climate-finance system. Exclusion, therefore, reflects an ecosystem disconnect as well as a funding-access problem: The pathway can break before an OPD becomes aware of an opportunity or is considered a potential partner.

> Knowledge of climate change remains limited among PwDs and is largely drawn from news coverage. Their participation in local environmental programmes is also minimal, partly because physically demanding activities reinforce assumptions that they cannot contribute. Us as an OPD also just recently begun engaging with climate issues, as we previously focused more on immediate disability rights.
>
> **— OPD, Indonesia**

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Data gaps constrain identifying and targeting disability-inclusive climate action. Limited disability-disaggregated data was consistently identified as a practical constraint. Several fund managers reported an interest in including PwDs but were unable to obtain reliable information on disability prevalence, location, or support requirements, particularly at the subnational level. Available disability data are not consistently connected to climate-financing planning, targeting or monitoring systems.

The clearest illustration emerged from disaster response experience. Based on the KII findings, datasets used during emergencies were frequently reported to record only sex, without fields for disability, household composition or female-headed households. Village and district records were also frequently outdated, requiring local organisations to collect data again during implementation or emergency response. Late or incomplete government data can also lead to poorly targeted assistance and duplication. Field evidence included an instance in which two different agencies constructed transitional shelters in the same locations, illustrating how weak data and coordination can undermine effective allocation.

When disability is absent from the dataset, PwDs may not be systematically identified, consulted or included in targeted processes, regardless of what a policy or safeguard framework requires. The data gap therefore converts formal invisibility into practical exclusion.

These limitations are compounded by stigma. In some rural communities, families may be reluctant to disclose that a household member has a disability. Inaccessible information and limited outreach further reduce participation, while family members or disability companions may mediate involvement, reproducing assumptions that PwDs cannot participate independently. Exclusion is therefore produced through the interaction of weak administrative systems, social stigma and programme processes that depend on individuals already being visible within formal records.



> “When delivering emergency assistance, we often struggle to obtain current data on PwDs. In many locations, it is almost entirely unavailable. Instead of responding immediately, we must first identify who needs support and what assistance they require. By the time assistance reaches them, it is often already too late.”
>
> **— CSO, Indonesia**

Inclusion carries weight primarily when it is binding. Across interviews with fund managers and implementing organisations, disability inclusion and wider social inclusion appeared to receive the strongest operational attention when required by a donor or investor before financing approval. Examples included projects supported by ADB or the World Bank that required gender- or disability-related assessments and meaningful participation. Where inclusion was introduced only as guidance or a recommendation, it had considerably less influence over project selection, financing terms or implementation.

One of the fund managers’ internal arrangements illustrates this distinction. Environmental and social due diligence is mandatory and can affect whether financing proceeds. Gender assessments generate recommendations and a corrective action pathway but do not carry equivalent consequences for approval, pricing, or loan size. Disability follows a similarly non-binding pathway. KII evidence also indicated that the safeguard pillars applied to a programme may vary depending on the requirements set by the funding source.

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Disability can consequently be omitted where it is not specifically required, rather than operating as a consistent institutional standard across financing windows.

This creates an accountability gap in both directions. Upward accountability is supported by established templates and compliance procedures, while downward accountability, whether affected communities influenced decisions, accessed benefits or could seek redress, is less consistently resourced and enforced. A CSO stakeholder characterised reporting to funders as the easier part. The more difficult task is ensuring that organisations receiving funds through the delivery chain practise disability inclusion as an institutional value rather than merely complete the required documentation.

A programme may therefore satisfy formal reporting requirements without demonstrating that PwDs exercised influence or benefited in practice. When failure to fulfil a disability-inclusion commitment carries no consequence for approval, allocation or performance assessment, disability-inclusion language has limited power to change institutional behaviour.

Disability continues to be framed more often in terms of vulnerability than agency. Our findings indicated that disability is most often addressed through safeguards or broader categories such as "vulnerable groups". While these provisions can identify protection needs, there was less evidence of requirements for PwDs or OPDs to participate in programme governance, priority-setting or funding decisions. This can place PwDs in a "victim" position, defined primarily by vulnerability and risk, rather than recognising them as right-holders, implementing partners, knowledge holders and decision-makers. Reasonable accommodation may consequently be treated as an additional programme cost rather than as a necessary condition for equitable participation.

The financing system places considerable weight on forms of institutional readiness that many OPDs and smaller CSOs do not yet possess. Access to international climate finance requires legal status, robust financial management and safeguarding systems, technical staff, reporting capacity, and experience administering large grants. Developing these systems requires substantial time and resources, yet limited support helps smaller organisations become ready for funding. Grassroots OPDs are consequently often equipped to manage only smaller grants, while limited awareness, technical knowledge and resources for proposal preparation further restrict their access to larger grants. SIGAB's study found that of the 69% of OPDs aware of relevant programmes, only 24% had successfully attempted to access them.

These institutional barriers intersect with financing requirements and disability-related circumstances. Complex procedures, guarantor requirements and upfront capital requirements, mobility constraints, additional disability-related costs and livelihood insecurity can limit PwDs' and OPDs' ability to assume financial risk. Stakeholders also identified a further barrier in perceptions that PwDs cannot manage loans or substantial funding. Formal requirements and ableist assumptions can therefore reinforce one another: community knowledge and trusted local relationships carry less weight than established compliance systems and previous experience managing large funds.

Emerging examples demonstrate distinct dimensions of access. Practices in Indonesia show that some elements of more accessible financing and governance are feasible. Dana Nusantara, a movement-led direct funding organisation for grassroots communities in Indonesia, provides grants of up to 100 million directly to grassroots initiatives through simplified forms, proportionate verification, direct transfers and reporting support, with funds reportedly disbursed within 24 hours after approval. On the other hand, SIGAB's Disability-Inclusive Village model provides a complementary governance pathway by organising PwDs

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through Village Disability Groups and connecting them to village data collection, planning, budgeting and monitoring. In Rote Ndao, this approach was accompanied by a district regulation on inclusive villages and a reported 5% allocation of the village budget for disability-related programmes. The cases show how organised representation, local regulation and streamlined funding can reduce administrative distance and translate community priorities into resources. However, climate finance is not yet systematically channelled through SIGAB's model, and Dana Nusantara does not currently include PwDs among its priority groups.

Taken together, the evidence indicates that exclusion is not produced by a single barrier at the point of application. It is cumulative: PwDs and OPDs have limited influence over priority-setting. Disability is weakly reflected in budgets and administrative data. Inclusion requirements are frequently non-binding. And organisational readiness is assessed against systems that smaller actors have had limited opportunity or resources to develop. At the same time, the Indonesian evidence shows that individual components of a more accessible pathway, including simplified administration, rapid disbursement, disability-led local structures and dedicated budget allocation, already exist. They remain dispersed across various mechanisms rather than being combined within a systematic, disability-inclusive climate-finance pathway.

3. Kenya

- Multiple forms of climate finance exist, such as the international climate funds, national public finance, commercial and blended finance, carbon markets and devolved climate finance through CCCF and FLLoCA. These sources play different roles: International grants can support programme design, technical assistance and readiness, while domestic budgets are critical for implementation and the sustained financing of accessibility and reasonable accommodation. However, general policy commitments to inclusion do not automatically translate into budgeted disability-related costs or enforceable financing requirements. The research points to the need to integrate disability inclusion into county climate budgets, programme eligibility criteria and performance frameworks. Accessibility measures, such as sign language interpretation, accessible information and other reasonable accommodations, should be recognised as eligible and necessary programme costs rather than discretionary additions.
- The CCCF to FLLoCA model connects county financing with ward and community-level climate planning, allowing local actors to participate in identifying and prioritising investment, but access remains subject to county legislation, budgeting and performance requirements. The central finding is a gap between participatory climate planning and equitable access to climate finance. PwDs and OPDs are not systematically represented in FLLoCA's prioritisation, resource allocation and accountability processes. Although finance can reach county and community institutions, no consistent mechanism exists to transfer resources to OPDs or enable them to participate as funded implementing partners.
- International grants fund design and readiness. Domestic budgets fund implementation – country budgeting is the critical entry point for disability costs.
- Case of Lake Turkana: How it channels funds from foreign to county using a locally led model with country leadership and community co-creation but no disability inclusion framework, disability targets or disability-disaggregated beneficiary data.
- Clearest entry points identified: Embed OPDs in ward and community climate planning. Make accessibility and reasonable accommodation eligible budget items. Introduce disability-inclusive

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eligibility criteria for implementing partners. Require disability-disaggregated monitoring. Use existing CCCF and FLLoCA structures as the practical entry point.

- Snapshot of transferable findings. Kenya demonstrates that devolved and locally led climate-finance structures can create important opportunities for disability inclusion, but decentralisation alone does not guarantee that OPDs are represented or can access resources. The most critical gap lies between county-level financing and OPD-level participation and implementation. Addressing this gap requires a combination of formal representation, budgeted accessibility, disability-inclusive funding arrangements and accountable monitoring. These lessons are relevant to other countries seeking to move from broad disability-inclusion commitments to measurable, adequately financed participation in climate action.
- Breakpoint: Meso to micro, finance reaches county level, but no mechanism exists to move it to OPDs. County-level climate finance may support community priorities without necessarily providing OPDs with access to implementation funding or the resources needed to participate effectively. Complex eligibility, procurement, documentation and performance requirements can further disadvantage smaller OPDs with limited staff and financial capacity. The practical response is to introduce disability-inclusive eligibility criteria for implementing partners, proportionate funding, due diligence requirements and accessible funding arrangements that enable OPDs to participate as co-designers and implementers. Capacity strengthening should accompany these changes rather than substitute for access to finance.

The research in Kenya presents a mixed picture. On the one hand, the country has developed a comparatively well-established system for devolved climate finance, with county-level funds, participatory planning structures and formal mechanisms for financing local climate action. These arrangements can enable communities to identify and prioritise investments in water, agriculture, livestock and other climate-sensitive sectors.

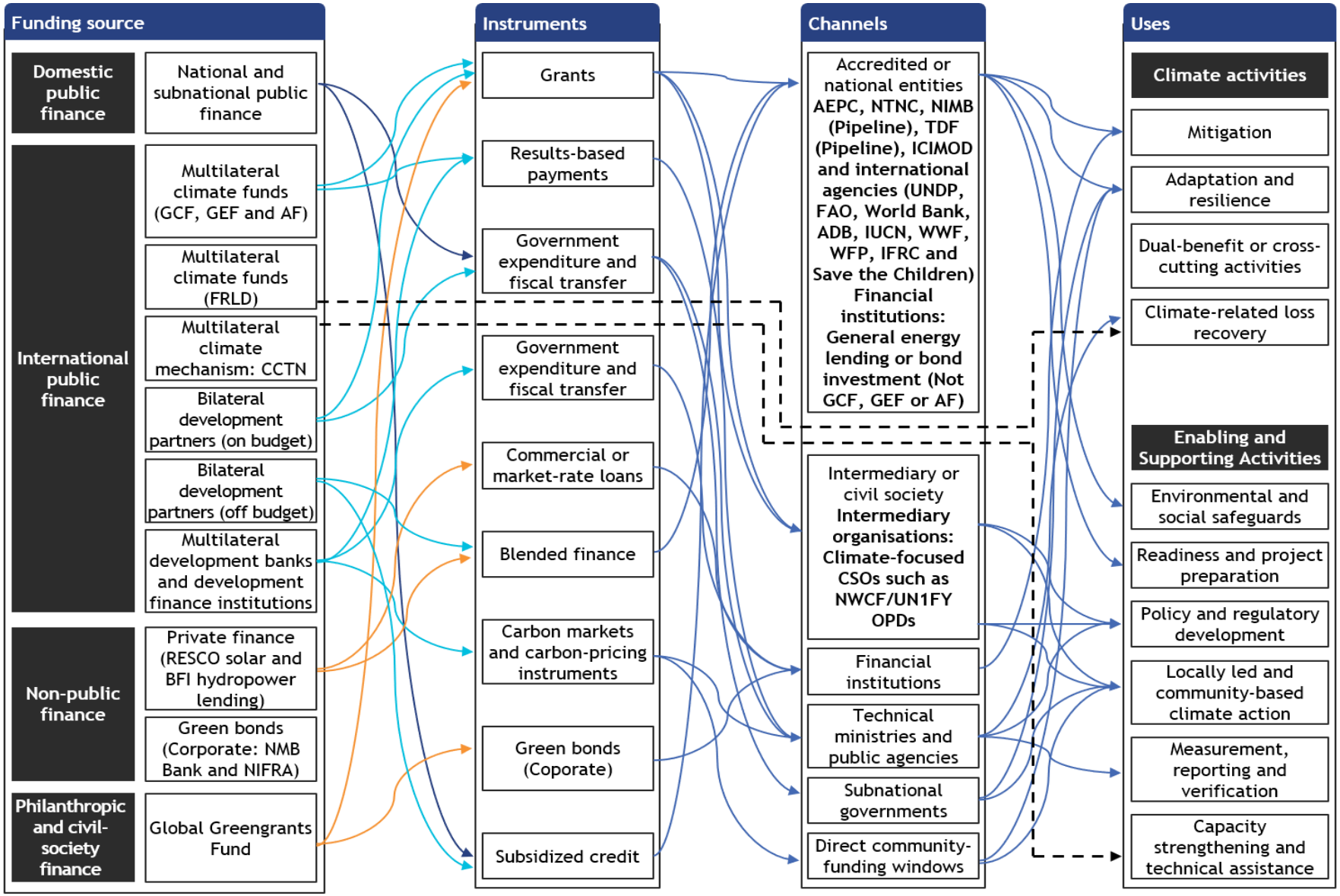
On the other hand, the evidence indicates that local participation and disability inclusion are not the same thing. Community priorities remain subject to institutional screening and approval, funds are managed through formal government systems and OPD representation does not necessarily translate into meaningful influence over financing decisions or project implementation.

There is a need to move beyond the presence of PwDs in committees towards their active participation throughout the financing cycle. This includes accessible information, influence over priorities, accessible project design, opportunities to access funding and effective accountability mechanisms.

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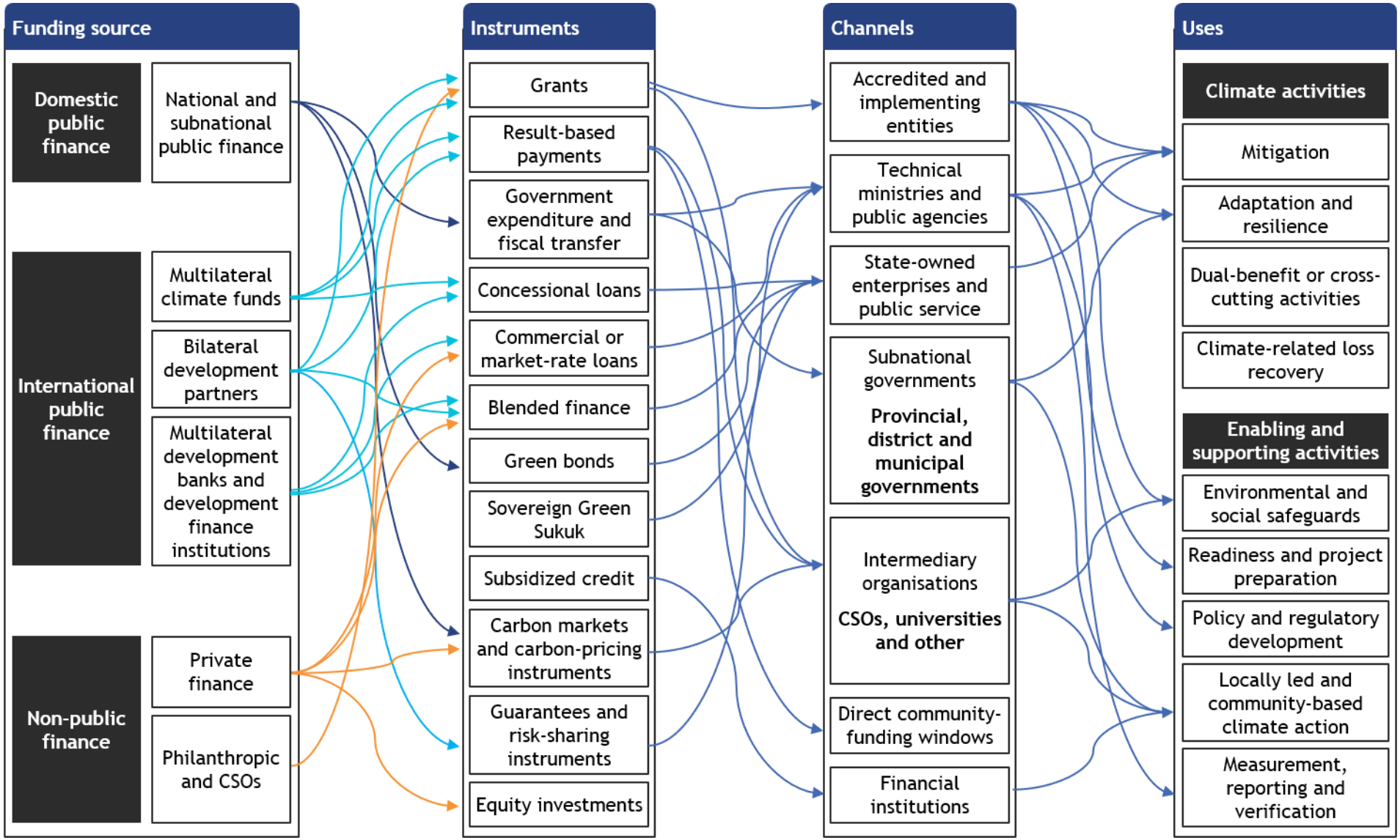
Annex 4: Country financing pathway maps

Nepal Climate Finance Architecture



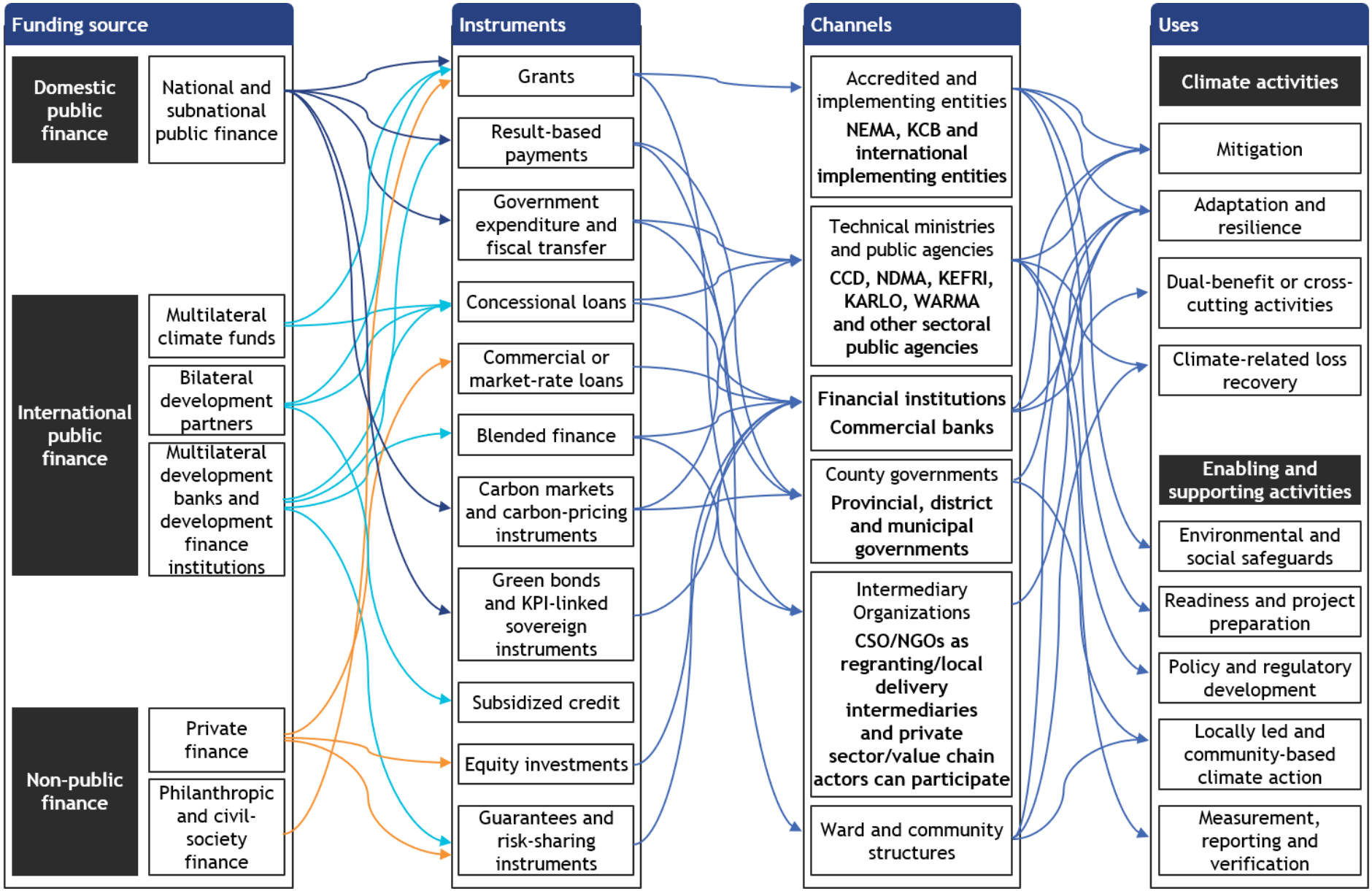
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Indonesia climate finance architecture



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Kenya climate finance architecture



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Annex 5: Methodology and evidence limitations

Methodology

Tiered purposive sampling across climate	Stratified sample across the institutional chain through which climate finance moves, from the national level down, with the global tier reviewed through documents, with a parallel accountability-tier sample (OPDs/researchers) sitting outside the money flow itself. This is a matched multi-level design: The same analytical construct (disability inclusion) is measured at each institutional tier, using the same country cases (Kenya, Nepal, Indonesia), with tiers defined by country. This allows the study to move beyond a single-tier snapshot and instead trace where, structurally, inclusion is present, degraded, or absent as it passes from one institutional actor to the next.
Stakeholders	1. **Global actors are** the funds themselves. The very top of the chain are the people who set the rules everyone below has to follow, reviewed through published documents but not interviewed; 2. **Decision-makers are** national government offices in Kenya, Nepal and Indonesia that officially represent their country to these funds and approve what gets submitted; 3. **Fund managers** are the organisations actually accredited to receive and manage the money once a country's proposal is approved, like AEPC in Nepal; 4. **International non-governmental organisations (INGOs)** and bilateral donors (like DFAT) who also move climate money, often alongside or parallel to the big funds; 5. **OPDs and researchers are** organisations run by and for PwDs, plus researchers for the people best placed to say what's actually happening on the ground versus what's claimed on paper; 6. **Local actors** are people closest to where the money is meant to land, at community/local government level.

Evidence limitations

Limitation	Effect on the findings	How the study responded
Purposive, non-representative sample and limited OPD consultation: Interviews were chosen for their position in the financing chain, not drawn at random. Respondents were reached through MSC (MicroSave Consulting) networks and introductions from CBM Global country teams, so better-	Findings describe patterns among the actors interviewed. They do not statistically represent a whole tier or country. The limited OPD and civil society consultation in Indonesia means the findings may not capture the full	Sampling covered every tier of the chain except the global funds. The report identifies the limited Indonesian consultation as an evidence limitation; further

Limitation	Effect on the findings	How the study responded
connected actors are more likely to appear. Sample size and composition differ by country.	diversity of perspectives from the disability movement and related civil society actors. Perspectives on Dana Nusantara were not independently validated through these additional consultations.	engagement with PJS, WALHI and other relevant organisations would help validate and deepen the findings.
Global funds not interviewed. No representative of the GCF, GEF or AF took part. Fund-level findings rest on published policies, Board documents and accreditation standards, as well as the accounts of national actors who work with the funds.	Findings on how the funds write and apply their rules could not be tested against the funds' own explanation of intent or practice. Statements that a fund has no disability indicator or accreditation test mean none appeared in the documents reviewed.	Fund policies, standards and Board decisions were read directly and attributed to their sources. National actors were asked how fund rules operate in practice.
We did not interview local government officials in Nepal. Local-level findings draw on documents and on the accounts of intermediaries and OPDs.	Findings on how rules are set and on what happens at the point of delivery, are less tested than findings from the middle of the chain.	Fund policies, accreditation standards and programme reviews were read directly. Local-level claims are attributed to their source.
Little disability-disaggregated data in the sources. Funds, ministries and programmes seldom report by disability, so the study cannot say how much finance reaches PwDs. A statement that no evidence was found, for example, of a disbursement to a disability-led organisation means that none was found in the sources reviewed. It does not prove that none exists.	Findings are qualitative and cannot be expressed as shares of finance.	The wording separates "no evidence found" from "does not occur". Respondents were asked for disaggregated data and where none was provided, the gap is recorded.
Figures from the organisations that run the programmes.	These figures were not independently audited.	They are attributed to their source and marked tentative where the source does so. Where possible, they were cross-checked against interviews.
Accounts that diverge or could not be corroborated. NFDN confirmed that	Some findings remain contested or indicative.	Divergent accounts are reported side by side. They

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Limitation	Effect on the findings	How the study responded
CCMD now invites OPDs and provides sign language interpretation, while another OPD representative called government-convened participation largely tokenistic.		are not resolved in favour of the institutional source, as the inception report committed.
Language and document access.	Individual clauses and quotations carry a risk of reading or translation error.	Where a translation was used, we checked clauses that carry a finding (such as committee membership) against the Nepali text.
Different institutions behind the same labels. Kenya has a devolved climate fund, Indonesia has an off-budget fund manager and Nepal has a centralised approval route with no devolved fund. "Meso" and "local" therefore refer to different institutions in each country and samples differ in size and composition.	Comparisons show patterns and break points. They do not rank countries.	A common assessment framework and matched questions were used and local actors are described in country-specific terms.
Scope. The study covers GCF, GEF and AF. FRLD is tracked separately because its arrangements are still developing. The Climate Investment Funds, development bank lending, UN agencies and private finance appear only as parts of these pathways.	Findings do not extend to these sources as financing channels in their own right.	The selection rationale is set out in the global fund review.
Compressed timeline and fast-moving context.	Follow-up interviews and iterative validation were limited. The findings describe the position as of October 2026.	The effort focused on identifying priorities for the highest-value pathways. Lower-priority questions are recorded as gaps.

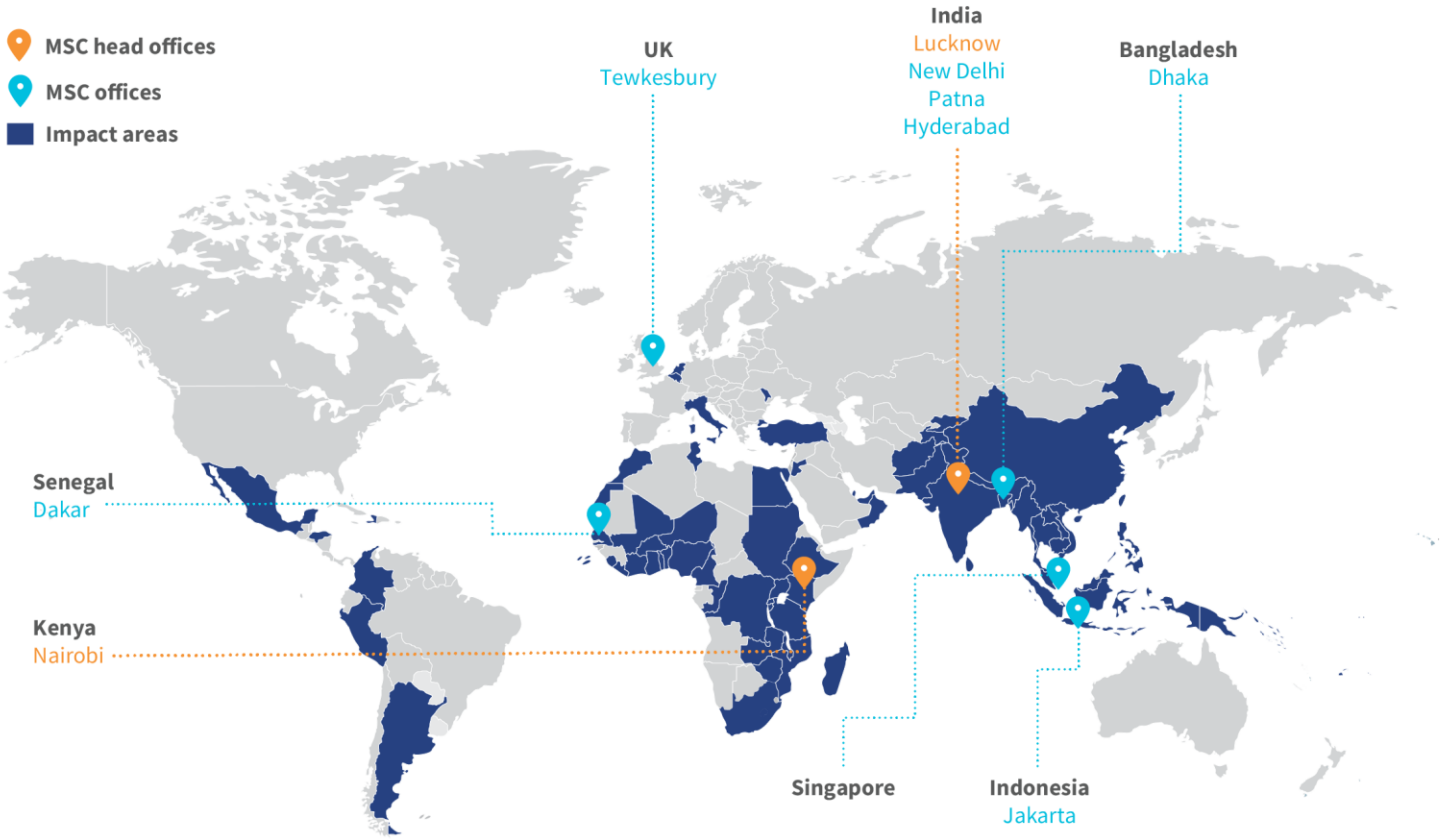
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Annex 6: KII/stakeholder list and consultation approach

Country	Stakeholder category	KII conducted	Total KIIs
Nepal	**Climate finance decision-maker**	IERD, Ministry of Finance (NDA under GCF) CCMD, Ministry of Agriculture, Forests and Environment	10
	Intermediaries/Fund managers	Shiba Satyal Banskota, ICIMOD Bibek Kafle, AEPC	
	OPDs/Researcher	Jalasa Sapkota, NFDN Umesh Magar, UNIFY/NWCF Muna Shakva, NIDSEWA	
	INGO	Ugan Manandhar, FCDO Durga Kafle, DFAT	
Indonesia	**Intermediaries/ Fund managers**	Kemitraan - GCF Accredited Entity AF National Implementing Entity PT SMI - GCF Accredited Entity National Financial Intermediary for Green Infrastructure Financing BPDLH- Public Environmental Fund Manager Dana Nusantara	6
	OPDs	SIGAB	
	CSOs	Yayasan Penabulu	
Kenya	**OPDs**	Disability Empowerment Network (DEN) Gifted Community Center (GCC) UDPK	7
	Intermediaries/Fund managers	FLLoCA	
	Climate Finance Decision Makers	Jane Gitau - Director of Climate Change and FLLoCA Coordinator, Bungoma County George Emase - Director of Climate Change and FLLoCA Coordinator, Turkana County	
	Local Climate Actors	Shadrack Chogea - Ward climate committee chairperson	

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