

Adaptation Fund Board
Forty-Seventh Meeting
Bonn, Germany

SIGNATURES ON PUBLICLY AVAILABLE DOCUMENTATION

Strategic Issue

- a) The project documentation of the Adaptation Fund (the Fund) is integral to the Fund's ability to support the efforts of recipients to adapt to the effects of climate change.
- b) Towards this end, the Fund's project documents serve strategic, operational, and policy purposes as a key tool for directing resources in line with its mandate, for ensuring resources are programmatically deployed in an effective and impactful manner, and for supporting the interests of a broad range of stakeholders through transparency and inclusiveness.
- c) Modifications to the Fund's project documentation to strengthen any of these purposes must do so while in a manner that upholds the other purposes.

Purpose

1. This paper presents options for the Board's consideration regarding the treatment of physical signatures in concept notes, fully developed project documents, project formulation grant (PFG) applications, and letters of endorsement that are currently made publicly available on the Adaptation Fund website.

Recommended Decisions

2. The Adaptation Fund Board, having considered document AFB/B.47/12, decides ~~to~~:
- (a) To remove the requirement for implementing entities to apply physical signatures to the templates for the certification sections of pre-concept notes, concept notes, fully developed project documents, and project formulation grant (PFG) applications;
- (b) That implementing entities may use a separate form to certify the validity of pre-concept notes, concept notes, fully developed project documents, and PFG applications submitted to the Secretariat;
- (c) That Letters of Endorsement submitted by implementing entities to the Secretariat with pre-concept notes, concept notes, fully developed project documents, and PFG applications shall be retained by the Secretariat in its records and their existence publicly certified by it;
- (d) That the Secretariat shall make available, upon request and for specific projects, Letters of Endorsement after redacting the signatures contained therein; and
- (e) That the change referred to in subparagraphs (a) - (d) will take effect from January 1, 2027.

Background

3. At the thirty-seventh meeting of the Project and Programme Review Committee (PPRC), the Chair recalled that an Implementing Entity (IE) had requested that the IE Coordinator's signature on its documentation be redacted before the documentation was made publicly available on the Adaptation Fund website, owing to concerns that the signature could be copied and misused. The PPRC discussed the matter and noted that the inclusion of a signature on such documentation on a public website provides a useful indication that the document is the final, approved version. At the same time, the matter should be considered in light of its legal implications.
4. Based on the PPRC's recommendation, the Board requested the Secretariat to consult with legal counsel, provide options for the acceptable presentation of signatures, and report back to the Board at its forty-seventh meeting (Decision B.46/54).

Use of Signatures on Concept Notes, Project Proposals, PFG Applications, and Letters of Endorsement

5. The Fund uses pre-concept notes, concept notes, fully developed project documents, and project formulation grant (PFG) application forms, and letters of endorsement to support Implementing Entities' (IE) application for Fund resources. Concept notes, fully developed project documents, and PFG applications are the basis for the IEs' project or programme design and have a certification section as a part of the template (see Annex A and B). Letters of endorsement from Designated Authorities are attached to these documents and included as part of the document submission process (see Annex A). When IEs submit pre-concept notes, concept notes, fully developed project documents, or PFG applications to the Secretariat, the certification section is signed in ink by the IE Coordinator to certify the validity of the documents submitted by the IE. Letters of endorsement that accompany these project related documents are also signed in ink by Designated Authorities to certify that the recipient government endorses the proposed project (either as a concept note or project proposal) or PFG application. The certification of validity and endorsement for concept notes, fully developed project documents, and PFG applications are essential for the Secretariat's review and subsequently for the PPRC and in turn for the Board when making recommendations or decisions regarding funding of projects.
6. Per the Board's [Open Information Policy](#) (OIP) adopted in July 2013 (Decision B.21/18), all concept notes, fully developed project documents, PFG applications, and letters of endorsement are publicly disclosed on the Fund's website. This includes the sections of the documents that contain the physical signature of the IE Coordinator that certifies the validity of the documents submitted and the accompanying letter of endorsement that also contains a physical signature. The public disclosure of these documents with their certification or endorsement is an important means by which the Board meets its commitment to transparency under its OIP to build and maintain public dialogue and awareness, and enhance good governance, accountability, and programmatic effectiveness for a range of stakeholders.
7. The OIP states that information on the work of the Fund is by default disclosed, unless there is a compelling reason for confidentiality. The five main categories that are considered such compelling reasons include: information that may harm the Fund's relations with other governments or institutions; information that may pose a security or safety risk for any individual; personal information; commercially sensitive information, and information that is exempt from disclosure under other policies or regulations, including deliberative information (OIP,

paragraphs 2, 3, 6-9). While the OIP does not directly address the subject of physical signatures, as requested by the Board the Secretariat sought legal advice regarding the subject of physical signatures under the OIP. The Secretariat also sought guidance from the World Bank's Data Privacy Office (DPO)¹ concerning any data privacy considerations affecting the Secretariat. Both the legal advice and guidance from the Bank's DPO affirmed that physical signatures are considered personal information and advised they should not be publicly disclosed. It is therefore proposed that physical signatures be viewed as personal information under the Board's OIP and therefore should be withheld from public disclosure.

8. The Fund's [Operational Policies and Guidelines \(OPGs\)](#), as amended in October 2022, do not explicitly require physical signatures as a means of certifying project related documentation submitted to the Board via the Secretariat, but the templates for pre-concept notes, concept notes, project proposals, and PFG applications, as set out in Annexes A and B to this document, request physical signatures and therefore exist as a de facto requirement. With regard to letters of endorsement, the Fund's Operational Policies and Guidelines (OPGs), as amended in October 2022, similarly do not require a physical signature on letters of endorsement, but exists as a common practice among many governments.

Proposals to Remove Signatures from Public View

Pre-concept notes, concept notes, project proposals, and PFG applications

9. Following the launch of the online proposal submission modality in June 2026, IEs have been successfully submitting concept notes, fully developed project documents, and applications for PFGs (along with letters of endorsement attached) to the Secretariat through the online platform. Building on this new modality, the Secretariat explored options for the Board's consideration.
10. The first option the Secretariat considered was continuing the disclosure for concept notes, fully developed project documents, PFG applications on the Fund's website while redacting all physical signatures. However, this approach would require substantial manual effort. Project documents are frequently revised and resubmitted by IEs prior to consideration by the PPRC, with signed versions of project related documents required at each stage. As the Secretariat posts updated versions of these documents on the website, redacting signatures from every submission would create a significant administrative burden, particularly given the volume of proposals received and reviewed. Therefore, this option is not considered practical.
11. The second option considered was to remove requirements for physical signatures from project related templates and replace this practice with a certification section in the online portal. By adding a certification section to the online portal, the IE Coordinator would be able to certify electronically the pre-concept note, concept note, fully developed project document, or PFG application at the time of submission. This certification could take the form of a box that is checked by the IE Coordinator when all project related documents are uploaded into the portal. The online submission system would record a certification log, including the name of the certifier and the relevant time stamp that the Secretariat would keep as part of internal project records. This would not pose any additional administrative burden on any IE, but rather even reduce the amount of work involved in printing, physically signing, and then scanning project related documents. However, based on informal consultations with several IEs, this option may not be practical for all IEs, as the person submitting a proposal via the online submission system, is not

¹ The OIP, paragraph 10, states the Secretariat is subject to the World Bank's Access to Information Policy.

always the designated IE Coordinator responsible for certifying the validity of project related documents.

12. A third option considered was using a paper-based certification approach, given for some IEs electronic certification via the online submission platform is not viable. This approach would involve IEs attaching a short certification form as a separate and stand-alone document with the physical signature of the IE Coordinator. Upon receipt of the signed certification document, the Secretariat would verify this document and keep it as part of internal project records and not upload it to the Fund's website as part of a pre-concept note, concept note, fully developed project document, or PFG application document.
13. The Secretariat therefore recommends the approach of using signed certification documents submitted as separate documents along with pre-concept note, concept note, fully developed project document, or PFG application documents.

Letter of Endorsements (LOEs)

14. Although the Secretariat has not received any requests or concerns related to Letters of Endorsement (LOEs), these are another category of document containing physical signatures that are made publicly available on the Fund's website. Compared with certifications of project related documents signed by IE Coordinators, the public interest in LOEs is considered higher. LOEs are signed by the primary contact person in Designated Authorities (DAs), who often hold official senior positions in their government administrations. LOEs are important for certifying national ownership and support for the project to a range of national and international stakeholders.
15. IEs obtain LOEs and submit them to the Secretariat along with project related documents, per the Fund's OPGs. Upon receipt, the Secretariat authenticates LOEs by reviewing not only the physical signature but also the letterhead of the letter from the DA. Therefore, it is advisable that LOEs should remain letter based. For the sake of consistency of application of the Board's OIP and consistency of practice regarding physical signatures, the Secretariat proposes to also protect the physical signatures of DAs.
16. As for pre-concept notes, concept notes, fully developed project documents, and PFG applications, the Secretariat considered the option of manually redacting the physical signatures of LOEs it receives along with project related documents. However, the volume of LOEs is quite high given new LOEs are signed for new or updated versions of project related documents. Where a regional project is concerned, the number of LOEs multiplies. As above, the option of manually redacting all signatures entails a significant additional administrative burden.
17. Similar to the proposal above regarding certification documents from IEs, the Secretariat proposes to keep LOEs as part of internal project records and not upload them to the Fund's website as part of a pre-concept note, concept note, project proposal, or PFG application document. The Secretariat further proposes to represent publicly a certification that LOEs were received along with project related documents. Upon request, the Secretariat could make LOEs available for specific projects to the parties interested. Where an LOE is disclosed, the signature should be redacted. This would ensure physical signatures on LOEs are protected as personal information per the disclosure exclusion criteria of the Board's OIP.

**Annex A: Part IV: Endorsement by Government and Certification by the Implementing Entity
(Excerpt of the proposal template)**

**PART IV: ENDORSEMENT BY GOVERNMENT AND
CERTIFICATION BY THE IMPLEMENTING ENTITY**

A. Record of endorsement on behalf of the government²

Provide the name and position of the government official and indicate date of endorsement. If this is a regional project/programme, list the endorsing officials all the participating countries. The endorsement letter(s) should be attached as an annex to the project/programme proposal. Please attach the endorsement letter(s) with this template; add as many participating governments if a regional project/programme:

<i>(Enter Name, Position, Ministry)</i>	<i>Date: (Month, day, year)</i>

² Each Party shall designate and communicate to the secretariat the authority that will endorse on behalf of the national government the projects and programmes proposed by the implementing entities.

B. Implementing Entity certification

Provide the name and signature of the Implementing Entity Coordinator and the date of signature. Provide also the project/programme contact person's name, telephone number and email address

I certify that this proposal has been prepared in accordance with guidelines provided by the Adaptation Fund Board, and prevailing National Development and Adaptation Plans (.....list here.....) and subject to the approval by the Adaptation Fund Board, <u>commit to implementing the project/programme in compliance with the Environmental and Social Policy and the Gender Policy of the Adaptation Fund</u> and on the understanding that the Implementing Entity will be fully (legally and financially) responsible for the implementation of this project/programme.

Name & Signature Implementing Entity Coordinator	
Date: (Month, Day, Year)	Tel. and email:
Project Contact Person:	
Tel. And Email:	

Annex B: Revised PFG submission Form for PFG



Revised PFG Submission Form³ (additions in red) Project Formulation Grant (PFG)

Submission Date:

Adaptation Fund Project ID:

Country/ies:

Title of Project/Programme:

Type of IE (NIE/RIE/MIE):

Implementing Entity:

Executing Entity/ies:

A. Project Preparation Timeframe

Start date of PFG	
Completion date of PFG	

B. Proposed Project Preparation Activities (\$)

List of Proposed Project Preparation Activities	Output of the PFG Activities	US\$ Amount	Budget note⁴
Total Project Formulation Grant			

³ As presented in AFB/PPRC.33/40 Annex 1.

⁴ The proposal should include a detailed budget with budget notes indicating the break-down of costs at the activity level. It should also include a budget on the Implementing Entity management fee use.

Please describe below each of the PFG activities and provide justifications for their need and for the amount of funding required:

For LLA Projects only:

If requesting additional funding for LLA projects to enable devolving decision making to the local level, please specify the activities that would directly serve to enable devolving decision making to the lowest appropriate level and enable local actors to make informed decisions on how adaptation actions are defined, prioritized, designed, and implemented:

Please provide justifications for their need and for the amount of additional funding required:

C. Implementing Entity

This request has been prepared in accordance with the Adaptation Fund Board's procedures and meets the Adaptation Fund's criteria for project identification and formulation

Implementing Entity Coordinator, IE Name	Signature	Date (Month, day, year)	Project Contact Person	Telephone	Email Address