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Independent Evaluation of the Green Climate
Fund's Approach to Indigenous Peoples

GREEN CLIMATE FUND
INDEPENDENT EVALUATION UNIT

Independent Evaluation of the Green Climate Fund's Approach to Indigenous Peoples

COUNTRY CASE STUDY REPORT: PARAGUAY

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ABBREVIATIONS

AE	Accredited entity
AFD	Agence Française de Développement (Agency for Development)
APR	Annual performance report
EE	Executing entity
FP	Funding proposal
FPIC	Free, prior and informed consent
GCF	Green Climate Fund
ILO	International Labour Organization
INDERT	National Institute for Rural Development and Land
INDI	Paraguayan Indigenous Institute
INFONA	National Forestry Institute
IP	Indigenous Peoples
IPO	Indigenous Peoples organization
MADES	Ministry of Environment and Sustainable Development
MEF	Ministry of Economy and Finance
NDA	National Designated Authority
PNPI	National Plan for Indigenous Peoples
REDD	Reduced emissions from deforestation and forest degradation
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
UNEP	United Nations Environment Programme

A. INTRODUCTION

This evaluation aims to objectively assess the Green Climate Fund's (GCF) performance in implementing its Indigenous Peoples Policy throughout its different stages.

The Indigenous People Policy (hereafter referred to as “the Policy” or “IPs Policy”) aims to provide a framework that ensures GCF activities are designed and carried out with full respect for the dignity, human rights, and cultural uniqueness of IPs, ensuring that they:

- benefit from GCF activities and projects in a culturally appropriate manner.
- do not suffer harm or adverse effects from the design and implementation of GCF-financed activities.

The evaluation examines the impact of implementing the Policy in GCF-funded activities involving IPs. This case study focuses on how the Policy was applied in Paraguay. Paraguay was chosen due to the number, size and significance of GCF-funded projects in the country that involve IPs.

The Paraguay mission was conducted between 22 and 27 June 2024 in Paraguay by Genta Konci, a GCF IEU member, and Mercedes Gelga Guainer, a social scientist and Indigenous leader.

1. GCF IPs-RELATED PORTFOLIO IN PARAGUAY

The GCF's engagement with IPs in Paraguay is demonstrated by the number of projects involving and benefiting IPs, the scale of IPs-related investment, and the diverse participation of accredited entities (AEs), direct access entities, executing entities (EEs), and organizations collaborating with IPs.

The various entities collaborating with IPs in Paraguay are described below.

United Nations Environment Programme (UNEP) – AE and EE

UNEP engages with member states to address humanity's most urgent environmental challenges. For over five decades, UNEP has partnered with governments, civil society, the private sector and other United Nations agencies to tackle climate change, biodiversity loss and pollution. UNEP strengthens environmental governance and promotes low-carbon, resource-efficient development. It also prioritizes the protection of ecosystems and delivers evidence-based scientific assessments to guide policymaking. By addressing the root causes of environmental crises, UNEP supports global efforts towards sustainable development and environmental resilience, fostering harmony with nature and supporting the United Nations Sustainable Development Goals (SDGs).

According to the *UNEP and Indigenous Peoples: A Partnership in Caring for the Environment* (United Nations Environment Programme, 2012), the programme emphasizes the significance of IPs' rights, knowledge and practices in promoting environmental harmony. The organization ensures IPs are meaningfully included in environmental initiatives and policy development, prioritizing active collaboration rather than symbolic representation. Guided by the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and recommendations from the United Nations Permanent Forum on Indigenous Issues, UNEP engages Indigenous communities as essential partners in environmental governance, with a structured approach for sustained dialogue and cooperation.

United Nations Development Programme (UNDP) – AE

The UNDP works with about 170 nations and territories. It aims to end poverty, reduce inequality and marginalization, build resilience for sustainable progress (United Nations Development

Programme, n.d.), and support countries in achieving the SDGs. Its Policy of Engagement with IPs emphasizes participation in decision-making, support for self-determination, conflict prevention and sustainable development. UNDP advocates for Indigenous rights and knowledge, encouraging inclusive participation and integrating Indigenous perspectives. The agency's key focus areas include democratic governance, human rights, poverty reduction, conflict prevention and sustainable development (United Nations Development Programme, 2021). The UNDP has served as an AE since 2015.

Food and Agriculture Organization of the United Nations (FAO) – AE and EE

The FAO operates in more than 130 countries, leading the United Nations efforts to defeat hunger. Its goals are to achieve food security for all and guarantee consistent access to nutritious food, enabling people to lead active and healthy lives. The agency's publication *Indigenous Peoples and FAO: A narrative for working together* outlines 11 core principles that emphasize working with IPs, rather than acting on their behalf. The principles include speaking respectfully, not grouping IPs with other communities, recognizing their knowledge and contributions to food security, and avoiding characterizing them as inherently vulnerable. The FAO ensures the use of free, prior and informed consent (FPIC), uses terminology from the *United Nations Declaration on the Rights of Indigenous Peoples* promotes knowledge co-creation, supports the "do no harm" philosophy, and respects the voices of Indigenous women and youth (Food and Agriculture Organization of the United Nations, 2024).

The FAO's initial term as an AE ran from 2018 to 2023, with its second term now under consideration. The organization is recognized as a medium-sized entity under category B for environmental and social risk. The FAO meets basic fiduciary standards, ensuring efficient oversight and execution of its activities through effective project management (Green Climate Fund, n.d.-a).

Ministry of Environment and Sustainable Development (MADES) – EE

MADES formulates and evaluates national environmental policies, emphasizing the sustainable use and management of natural resources. It implements programmes aligned with the Paraguay 2030 National Development Plan (Paraguay, Ministerio de Hacienda, 2014), focusing on poverty reduction, inclusive growth, and environmental sustainability. The ministry also enhances ecological planning and pollution control to improve quality of life while ensuring long-term environmental balance (Paraguay, Ministry of Environment and Sustainable Development, n.d.).

National Agency for Development (AFD) – EE

The AFD supports global efforts towards sustainable development by financing climate, biodiversity, urban planning and governance projects. Operating in over 150 countries, AFD implements initiatives that align with the SDGs, focusing on fair and sustainable transitions. It engages in diverse sectors to promote resilience and inclusive development, emphasizing strategic cooperation in France's overseas regions and international contexts (Agence Française de Développement, n.d.).

According to the *Regional Strategy Brazil-Southern Cone 2020-2024*, the AFD operates in Brazil, Argentina and Paraguay to support sustainable development initiatives. The strategy addresses pressing regional challenges by prioritizing territorial, ecological transitions and energy transitions (Agence Française de Développement, 2020).

Ministry of Social Development – EE

The Ministry of Social Development strengthens institutional capacities to implement social protection, economic inclusion and promotion policies. It coordinates national social policies,

ensuring management based on ethics, equality and transparency, focusing on strategic articulation and effective evaluation (Paraguay, Ministry of Social Development, n.d.).

National Forestry Institute (INFONA) – EE

INFONA oversees the sustainable management and conservation of Paraguay's forest resources. It develops policies for forest preservation, reforestation and responsible ecosystem use, ensuring compliance with environmental regulations and promoting biodiversity protection and climate change mitigation. INFONA collaborates with Indigenous communities in Paraguay to promote forest conservation and sustainable land management in the Atlantic Forest Corridor. Through restoration projects and governance initiatives, INFONA aims to protect biodiversity while supporting the livelihoods of these communities.

The Ministry of Economy and Finance (MEF) is also the national EE for the GCF-funded funding proposal 121 (FP121). MEF implements the project's territorial planning, ensuring its operational and financial execution comply with national and international standards.

a. FP121 – REDD+ results-based payments in Paraguay for the period 2015–2017

According to FP121 landing page on the GCF website, Paraguay achieved a reduction of 23 million tons of carbon dioxide equivalent (tCO₂eq) in emissions between 2015 and 2017. This achievement stemmed from implementing reduced emissions from deforestation and forest degradation (REDD+) programmes with additional forest-related activities to protect the climate. The payment for these results will be used to implement the country's national strategy for forests and sustainable growth, which is aligned with its nationally determined contribution. These results have been assessed by the United Nations Framework Convention on Climate Change as fully compliant with REDD+ stipulations. This project, which is still under development, primarily focuses on mitigation, aiming to have an impact on forest and land areas. Approved in June 2019 and scheduled for completion by November 2026, the total project value is USD 50 million, 100 per cent financed by the GCF. The project falls into the small sized category, which ranges from USD 10 to USD 50 million. The project has successfully avoided 9.8 million tons of emissions (Green Climate Fund, n.d.-b).

According to the annual performance report (APR) 2022, the project has achieved several positive outcomes, including implementing training on environmental and social safeguards, strengthening the risk management capacities of technical teams, and executing training plans focused on gender integration and governance. At the institutional level, it has promoted coordination among government agencies, including MADES, INFONA and MEF, to improve the conservation of protected areas and the monitoring of deforestation and degradation. Additionally, early warning systems have been developed to monitor deforestation and forest fires, with progress made in implementing a digital system for managing transactions related to Environmental Service Certificates. Regarding IPs, the project has fostered extensive intercultural dialogue to select their representatives for the Steering Committee, ensuring the participation of Indigenous groups, including the Ayoreo, Nivaclé, Avá Guaraní and Aché peoples. Throughout the project, participatory workshops were held with key stakeholders, including IPs, to strengthen territorial governance and improve environmental management in protected areas. Moreover, Indigenous communities were directly involved in the planning and executing activities to enhance forest conservation and sustainability (United Nations Environment Programme, 2022).

b. FP062 – Poverty, reforestation, energy and climate change (PROEZA) project

According to FP062 landing page on the GCF website, the project was approved in March 2018 and is expected to continue until June 2027, with a lifespan of 30 years. The project takes a cross-cutting approach, addressing mitigation and adaptation, focusing on ecosystems and ecosystem services, energy generation and access, forest and land-use, and livelihoods for people and communities. The project seeks to promote forest planting and restoration in the eastern region of Paraguay, which is highly vulnerable to climate change, and in other municipal districts with extremely high social vulnerability. The strategy focuses on carbon sequestration and supporting local households in diversifying their agricultural production, thereby increasing their resilience to climate change impacts. Their vulnerabilities are exacerbated by deforestation and forest degradation, primarily affecting populations reliant on family farming for subsistence. Consequently, environmental conditional cash transfers will be exchanged for community-based, climate-sensitive agroforestry practices, acting as a bridge until new agricultural models become financially sustainable. Credit is expected to be available to establish productive forest plantations for bioenergy, timber, and silvo-pastoral production alongside capacity-building to enhance governance and law enforcement. The total project value is USD 90.3 million, with 27.8 per cent funded by the GCF and 72.2 per cent co-financed through a USD 49.3 million loan and USD 15.9 million grant. It aims to avoid 7.9 million tons of emissions and benefit 807,200 people – 87,210 directly and 720,000 indirectly. The project falls into the medium-sized category, which ranges from USD 50 to USD 250 million (Green Climate Fund, n.d.).

According to the APR 2023, the FP062 project has achieved notable progress in technical training, institutional strengthening, women's empowerment and the active participation of Indigenous communities. Throughout the project, 112 participants have been trained in leafcutter ant control, while 516 received technical assistance in managing agroforestry models, including the proper use of pesticides. Additionally, 233 staff members from governance institutions have undertaken training in gender issues. An Indigenous women leaders network and a rural women leaders network have also been established to promote female participation in the project through training and experience-sharing activities. In the legal field, 124 participants have received legal advice to improve land tenure, and a protocol has been developed to prevent and address institutional and land-related violence against women. Moreover, 268 participants, mostly women, have been trained in market access and income-generation. The project has also facilitated coordination among nine public institutions to identify challenges and opportunities, informing 2,316 people about FP062 and its eligibility criteria. The project's dissemination efforts have been reinforced through forestry events, expos, and hands-on workshops on silvo-pastoral approaches. The project has also strengthened financial institutions in sustainable forestry practices and conducted land tenure diagnostics in Colonia Naranjito, ensuring culturally relevant interventions with an intercultural approach (Food and Agriculture Organization of the United Nations, 2023).

Based on the APR's reported outcomes regarding IPs, 191 Indigenous communities have formally agreed to participate in the project through the "Good Faith Consultation Act" involving 7,488 participants. Of these, 67 per cent (5,018) were women, representing groups such as the Avá Guaraní, Mbya Guaraní, Aché, Paĩ Tavyterã and Guaraní Occidental. Six meetings of the Indigenous Peoples' Regional Coordinator were held in July and December 2023 to promote Indigenous participation in the project's decision-making process. Additionally, five meetings of the Special Indigenous Commission were held in the same period focused on monitoring the planning of activities with IPs. The leadership and representation of Indigenous communities were also

strengthened to ensure their active participation in the project's implementation (Food and Agriculture Organization of the United Nations, 2023).

2. NATIONAL DESIGNATED AUTHORITY (NDA) IN PARAGUAY

Paraguay's NDA is the MEF, which coordinates international technical cooperation programmes. The NDA structure builds on the work of the Ministry of Finance and the Secretariats of Public Function and Technical Planning, which previously hosted the NDA. Presidential Decree No. 6159/2016 mandates monitoring projects funded through international cooperation, a responsibility previously held by the now-defunct Technical Secretariat for Planning, which has since been integrated into the MEF. The NDA supports government initiatives to address climate change and advance a resilience and sustainability agenda in collaboration with institutional donors (GCF, 2023).

B. IPS IN PARAGUAY: THE CONSTITUTION AND LEGAL FRAMEWORKS

Law 904/81 – the Indigenous Communities Statute – was the first national legislation to explicitly address IPs. This statute governs public policies related to Indigenous issues in Paraguay and is complemented by Law No. 919/96, which expands and modifies its provisions (Paraguay, 1981). The Statute includes the following objectives:

- Preserving Indigenous culture, heritage, and traditions.
- Improving economic conditions for Indigenous communities.
- Promoting Indigenous participation in national development.
- Ensuring access to land for Indigenous communities.

It also defines the concept of an Indigenous community as:

- a group of extended families.
- sharing a common culture and authority system.
- speaking an autochthonous language.
- living in a communal environment (Paraguay, 1981).

The first version of the Paraguayan Constitution was promulgated in 1870, but IPs were officially recognized only in the 1992 Constitution with the adoption of article 62, which remains in force. Article 63 guarantees IPs the right to preserve and develop their ethnic identity and the freedom to maintain internal forms of organization. Through article 64, the Constitution ensures the right of IPs to communal ownership of land, in sufficient size and quality for the conservation and development of their way of life, and includes safeguards against alienation, transfer or taxation, and removal without consent. Article 65 secures the right of IPs to participate in the economic, social, political and cultural life of Paraguay. Their cultural characteristics, especially regarding education and protection against environmental and economic threats, are assured in article 66. Meanwhile, article 67 exempts them from social, civil, or military services and other public obligations.

Additionally, the Constitution recognizes Indigenous languages as part of the nation's cultural heritage under article 41. It assigns the responsibility of defending the rights of IPs through public criminal actions to the Public Ministry, as stated in article 268. The Senate's internal regulations establish the IPs Commission as one of its permanent committees under Chapter I, article 13. The Commission is tasked with conducting studies and providing opinions on projects or matters related

to the rights of ethnic identity, communal property, education, and assistance. It also addresses national legislation and policies promoting and protecting IPs and ethnic groups, as well as various activities related to IPs in annex III. Furthermore, the regulations ensure the representation of up to six Indigenous members on the Human Rights Commission, as specified in Chapter I, article 13.

The National Plan for Indigenous Peoples (PNPI) of Paraguay was published in 2021, reflecting the commitment made with UNDRIP. With an **intercultural approach, the PNPI involved representatives from all IPs across the country, marking a historic milestone in guaranteeing Indigenous rights**. The plan was developed through a participatory process, prioritizing the meaningful inclusion of Indigenous representatives to address their challenges through progressive and sustainable actions. It encompasses national and international legal frameworks that guarantee self-determination, access to land and natural resources, and economic, social, cultural and collective rights. The PNPI also covers critical legislation governing Indigenous education, health and language. Aligned with the 2030 Agenda for Sustainable Development and other Government programmes, the PNPI proposes a governance structure to ensure effective implementation, monitoring and supervision of its initiatives. This structure is designed to meet the fundamental needs of IPs, recognizing them as integral to Paraguay's national identity (Paraguay, Instituto Paraguayo del Indígena, 2021).

Alongside the previously mentioned legislation, Paraguay's legal framework includes other significant milestones that have advanced Indigenous rights. Law No. 4251 establishes measures to promote and guarantee the use of Indigenous languages, creating an organizational structure to develop a comprehensive national linguistic policy. Similarly, Law No. 5469 establishes the National Directorate of Indigenous Peoples' Health to ensure IPs have access to Paraguay's National Health System. This law emphasizes respect for traditional health practices and seeks to strengthen them by supporting Indigenous participation in health policies and programmes. It also ensures the protection of their knowledge and medicinal resources through an intercultural approach and active community involvement.

1. FREE, PRIOR AND INFORMED CONSENT IN PARAGUAY

FPIC is a fundamental right of IPs, recognized internationally under key instruments such as UN Declaration on the Rights of Indigenous Peoples (UNDRIP) (United Nations, 2007), the International Labour Organization (ILO) Convention 169 on Indigenous and Tribal Peoples (International Labour Organization, 1989), and the American Declaration on the Rights of IPs (Organization of American States, 2016). In Paraguay, FPIC has been ratified at the national level by Law No. 234/1993, which incorporates ILO Convention 169 into the nation's legal framework. This law requires governments to consult IPs, especially through their representative institutions, whenever legislative or administrative measures may directly affect them.

FPIC ensures IPs fair and unrestricted involvement in decision-making processes, supported by systems that facilitate the full and effective development of their projects. The process for obtaining consent or agreement must be conducted in good faith. When the State owns minerals or other natural resources on native territories, it must consult with the affected communities, include them in the benefits, and provide fair compensation for any harm caused. FPIC is also critical in land alienation cases and is required for educational initiatives that prioritize the use of Indigenous languages and promote Indigenous autonomy in their design. (International Labour Organization, 1989; Organization of American States, 2016; United Nations, 2007).

The protocol for conducting the FPIC consultation process with IPs in Paraguay was established by Decree No. 1039 of 2018. The Decree ensures Indigenous communities have the right to participate

meaningfully and effectively in FPIC processes. The protocol mandates that it be applied in all cases where the following entities propose activities in Paraguayan territory that may affect IPs' rights to land, territories, life and traditional livelihoods:

- Local, departmental and national governments
- Companies
- International financial institutions
- Other public, private or Indigenous entities

The Paraguayan Indigenous Institute (INDI), in collaboration with the Ministry of Justice, is responsible for implementing the protocol, with the Ministry providing support. The Paraguayan State retains ultimate responsibility for respecting and protecting the human and constitutional rights of IPs, including the duty to guarantee that FPIC is upheld for all project implementations.

The procedures established by the protocol emphasize that the process begins with the formal recognition of the parties involved, including a request for permission to consult and seek the consent of the IPs involved. The consultation processes must be adapted to the unique characteristics of each Indigenous community, addressing their specific needs and objectives while ensuring active State participation. The protocol sets minimum standards to ensure that consultations are conducted in good faith and that the rights of IPs, including FPIC, are guaranteed. Furthermore, it highlights that the individuality of each community within a particular Indigenous group must be respected, especially regarding their norms, customs and values, thereby acknowledging their autonomy.

2. NATIONAL ENTITIES ASSOCIATED WITH PARAGUAY'S IPs

The INDI is the main government agency responsible for Indigenous issues in Paraguay. Additionally, the MADES and the National Institute for Rural Development and Land (INDERT) play important roles in supporting IPs.

INDI – the Paraguayan Indigenous Institute

INDI's mission is to serve as a leading authority in implementing public policies that safeguard the permanence of IPs in their territories while respecting their self-determination and active participation. Its vision is to uphold and enforce Indigenous rights, preserve their sociocultural identity, and defend their traditions and heritage. INDI also promotes public policies that are clearly defined and inclusive, contributing to the wellbeing of IPs in programmes, plans and projects.

INDI is responsible for developing and implementing policies and programmes intended for IPs, as well as the coordination, supervision and evaluation of indigenist actions carried out by both the public and private sectors. The institute provides technical, scientific, legal, economic and administrative support to Indigenous communities independently and in collaboration with other entities. INDI promotes and regulates research on Indigenous communities, advocates for their rights with Government and private organizations, and proposes regulations on Civil Registry, Military Service, education and Indigenous identity documentation. It fosters links with national and international indigenist-focused organizations, promoting technical and professional development, particularly in agriculture, forestry and craft production, and other activities aligned with INDI's mission.

INDI operates as an autonomous entity with its own legal status and assets. While its primary connection with the Government's Executive Branch is through the Ministry of Education and Culture, INDI retains the autonomy to engage directly with other government ministries and agencies. Its legal headquarters are currently based exclusively in Asunción. INDI's extensive

regulatory framework predates the 1992 Constitution, stemming from its establishment under the Indigenous Communities Statute (Law 904/81). Its organizational structure includes:

- The Presidency
- The General Secretariat
- The General Directorates of:
 - The Cabinet
 - Ethnic Policies
 - Indigenous Protection
 - Administration
 - Finance (each with their respective subdivisions)

Ministry of Environment and Sustainable Development (MADES)

MADES oversees Paraguay's environmental policies, focusing on preserving areas affecting Indigenous territories and protecting natural resources. Its efforts include safeguarding Indigenous rights ecosystem preservation, developing projects such as FP121 “REDD+ results-based payments in Paraguay for the period 2015-2017”, and addressing climate crisis issues. Its website features over 300 news articles related to IPs between 2018 and 2024, confirming its role in working with Indigenous communities.

National Institute for Rural Development and Land (INDERT)

While INDERT is primarily focused on agrarian reform rather than specifically Indigenous issues, it plays a key role in the demarcation and titling of rural lands, including Indigenous lands. The Agrarian Statute, which guides much of INDERT's actions, briefly mentions IPs, affirming adherence to the ILO Convention 169, ratified by Paraguay through Law No. 234/93. Although the statute provides limited detail, INDERT's website featured 12 news articles highlighting updates to Indigenous land regularization, confirming its support for IPs.

Non-governmental organization – Tierraviva

Established in 1994, Tierraviva has been a major advocate for the human rights of IPs despite not being a governmental institution. Its primary focus is territorial restitution, working closely with six of the 20 ethnic groups: Enxet, Enlhet, Sanapaná, Angaité, Qom and Yshir. Guided by its support for IPs rights, Tierraviva engages in strategic litigation, public policy advocacy, training, organizational strengthening, political and legal education, and general advisory services, with a strong focus on territorial rights.

The expansion of agribusiness has caused significant environmental changes in Paraguay, especially in territories inhabited by IPs, whose rights are violated in the process. Tierraviva has emerged as a leader in defending Indigenous rights, bringing cases before the Inter-American Human Rights Protection System (*Comisión Interamericana de Derechos Humanos*) and the Inter-American Commission of Human Rights. These efforts have strengthened Indigenous rights and influenced the jurisprudence surrounding territorial rights. Notably, Tierraviva's work has led to the restoration of over 165,000 hectares in favour of IPs.

C. KEY FINDINGS

1. POLICY EFFECTIVENESS AND EFFICIENCY

Interviewees widely perceived the Policy's implementation as a learning process for both IPs and the involved institutions. While they acknowledged that the participation of Indigenous communities in planning and executing projects has improved, they noted several challenges persist, particularly in coordination and resource availability. These include:

- **Exclusion from the design phase:** IPs organizations (IPOs) reported not being involved in designing the project due to insufficient resources.
- **Limited access to project documents:** IPOs expressed concerns about restricted access and opportunities to review and discuss project documentation before the proposal's submission.

2. POLICY COHERENCE REGARDING NATIONAL POLICIES, LOCAL NEEDS AND COMMUNITARIAN PROTOCOLS

It was noted that the Policy has been applied consistently across different projects, with several interviewees stating that the GCF IPs Policy offers a comprehensive and well-structured framework for addressing IPs issues. **However, many highlighted that the IPs Policy clashes with local realities and legal frameworks, complicating its application in several areas of the country.**

Box 1. Local realities and adaptation needs

According to Iglesias and others (2021), **local realities** refer to a region or community's specific environmental, social and contextual conditions that influence their risk perceptions and adaptation needs to climate change. These realities include variables such as local dynamics of environmental degradation, water resource availability, and contextual conditions of agricultural or urban land-use. Each locality's unique experiences shape how individuals and communities respond to external interventions and climate challenges. Recognizing the diverse nature of local realities is essential to delivering relevant and effective mitigation and adaptation actions that respect each community's specific needs and circumstances.

Interviewees from the MEF indicated that the Policy is more rigorous than local frameworks. They noted that while the IPs Policy mandates strict compliance with FPIC and other safeguards, national policies such as PNPI are not always as rigorous. This mismatch creates challenges in aligning project requirements with national standards.

AE interviewees mentioned that the FPIC process was not guided by the IPs Policy Operational Guideline but by governmental and communitarian consultation protocols following the national Decree N° 1039.

Additionally, governmental entities representing the legal rights of IPs mentioned that they could not assess the FP documentation before the NDA submitted it to the GCF, limiting their capacity to determine if the proposal complied with national policies and protocols regarding FPIC and protecting IPs rights. Consequently, they only understood the scope and realities of the project when they visited the communities involved.

3. POLICY RELEVANCE

The Policy was regarded as relevant to the needs and priorities of IPs, especially in safeguarding their rights.

Participants highlighted the significance of the IPs Policy in projects like FP121, where the focus on protecting forests and biodiversity aligns with the Indigenous communities' traditional roles as custodians of their lands. By emphasizing respect for and integrating traditional knowledge and practices into project designs, the Policy has helped ensure projects address both environmental sustainability and the livelihoods of Indigenous communities. The Policy's alignment with Indigenous priorities has facilitated community support and project participation.

There is broad recognition of the unique social and environmental contributions IPs make to the climate change agenda. AEs, EEs and the NDA generally view the Policy as ensuring that projects not only deliver economic benefits but also enhance social cohesion and cultural preservation, which are critical priorities for these communities.

Nevertheless, the complexity and bureaucratic processes involved have sometimes hindered the effective implementation of the Policy.

During interviews, organizations representing IPs expressed the need for more time before starting project implementation to fully understand how the financial resources would impact their livelihoods. They further suggested that the urgency faced by AEs in finalizing FP documentation left insufficient time for IPs to fully understand project impacts.

Box 2. Time frames for IPs' consultation in national laws

Decree N° 1039¹ includes a section on time frames for conducting consultations with IPs. These timelines must be established through mutual agreements between the parties, ensuring that the duration of the process and the time allocated for each stage provide IPs with adequate time to understand the information received, seek additional details and consult advisers as needed for informed decision-making. This decision-making process occurs through dialogue conducted in assemblies and by consensus, with respect for IPs cultural traditions included in planning the time frames. The Decree emphasizes that traditional decision-making methods and community approaches to dialogue must be factored into setting the scheduling. The time frame for the process may vary depending on factors such as (i) the number of people, communities or Indigenous groups affected, (ii) the complexity of the proposed activities, (iii) the presence of additional community protocols, (iv) the volume of information required, and (v) the specific decision-making mechanisms of the Indigenous communities involved.

Governmental representatives highlighted during interviews that a key challenge was the limited familiarity of many local governments and agencies with the IPs Policy and its requirements. This lack of understanding led to difficulties in implementing projects according to the Policy's standards. For example, in some cases, local authorities did not prioritize the participation of IPs or lacked the capacity to facilitate effective FPIC processes. As a result, there was a misalignment between the Policy's goals and the reality on the ground, leading to inadequate project execution.

4. COUNTRY OWNERSHIP PRINCIPLE

In Paraguay, projects relevant to IPs have been articulated and led by the State. Many interviewees felt that the IPs Policy had strengthened country ownership principle in Paraguay by:

¹ Federación por la autodeterminación de los Pueblos Indígenas (2018).

- **Enhancing the participation of IPs:**
 - **Strengthened involvement in decision-making:** AEs, the NDA, and representatives from the Government noted that the Policy has strengthened the involvement of IPs in decision-making processes at various levels, such as by establishing regional and national councils. This has empowered Indigenous communities to actively contribute to project planning and implementation, aligning project outcomes with local priorities and ensuring greater ownership.
 - **Examples of active participation:** FP121 and FP062 have demonstrated the impact of community input in shaping project design and implementation.
- **Building institutional capacity:**
 - The Policy has facilitated **capacity-building initiatives** for Indigenous organizations and governmental agencies, enhancing their understanding and ability to comply with GCF standards, such as FPIC and environmental safeguards. These initiatives have strengthened the institutional framework needed for effective project implementation. As highlighted in interviews with different governmental entities, these capacity-building efforts have enabled local stakeholders to play a more active role in project governance.
- **Sharing responsibilities and accountability:**
 - **Mechanisms for shared decision-making and accountability:** The Policy has established mechanisms such as joint project committees and grievance redress systems, fostering a collaborative approach between the GCF, local institutions and Indigenous communities, ensuring that all parties are responsible for decision-making and accountability in project outcomes.
 - **Community feedback and accountability:** Specific accountability mechanisms, like the community feedback channels facilitated through joint project committees in FP121, have allowed Indigenous communities to hold project implementers accountable and promptly address their concerns.

However, interviewees generally believed that a limited understanding of the Policy across different governmental levels, combined with insufficient resources allocated to train local institutions on the Policy, could hinder the effective implementation of the country ownership principle as applied to the IPs Policy.

5. GENDER CONSIDERATIONS ALONGSIDE IPs

The integration of gender issues within the GCF IPs Policy, as reflected in FP121 and FP062, has led to greater inclusion and participation of Indigenous women by:

- **Recognizing gender roles and needs in Indigenous communities:**
 - **Integration of gender considerations:** The Policy emphasizes the importance of integrating gender considerations into project design and implementation. This commitment was evident in FP121 and FP062, where deliberate efforts were made to include Indigenous women in consultations and decision-making processes.
 - **Engagement and perspective inclusion:** During the initial consultations for the FP121, specific efforts were made to engage Indigenous women and incorporate their perspectives. These efforts ensured that their roles and needs were considered in project activities, including sustainable land management and agroforestry initiatives.

- **Establishing gender-specific mechanisms and representation:**
 - **Ensuring gender representation:** Interviews with Indigenous women representatives revealed that projects set up specific mechanisms to ensure gender representation, such as requiring equal representation of men and women in decision-making bodies. This approach was particularly evident in establishing regional and national councils, where women and men were selected as representatives to ensure gender parity.
 - **Building capacity and leadership skills:** Interviewees highlighted that the Policy's focus on gender equality led to the development of workshops and training sessions specifically for Indigenous women to build their capacity and leadership skills.
- **Incorporating gender-sensitive approaches in project design:**
 - **Adapting communication and consultation methods:** Projects incorporated gender-sensitive approaches to ensure accessibility and relevance to Indigenous women. These included adapting communication methods using visual aids and interpreters to facilitate understanding and participation in culturally appropriate ways.
 - **Addressing environmental and gender equity issues:** Interviewees highlighted that gender considerations were included in the design of energy-efficient stoves in FP062. These stoves reduced the time women spent on traditional cooking practices while addressing environmental and gender equity issues.

However, some barriers have hindered the full realization of gender equality goals, including:

- **Cultural barriers and traditional gender roles:**
 - **Cultural norms and leadership roles:** Traditional cultural norms in some Indigenous communities still limit women's participation in decision-making. Some interviewees noted that, in certain communities, women have not been traditionally seen as leaders or public representatives, which can hinder their active involvement in project activities.
 - **Undervalued contributions:** In some regions, even when women were invited to participate, their contributions were often undervalued or overshadowed, limiting their ability to contribute to project discussions and decisions.
- **Limited resources and support for women's initiatives:**
 - **Inadequate resources for women's participation:** While projects aimed to include gender-sensitive approaches, the resources specifically allocated for supporting women's participation and initiatives were often insufficient. This resulted in limited impact and sustainability of gender-focused activities within projects.
 - **Lack of follow-up support:** Representatives of IPOs and Indigenous women mentioned that, while initial efforts to engage Indigenous women were made, there was a lack of follow-up support and resources, limiting the initiatives' long-term effectiveness. For example, the absence of ongoing training and support for women leaders led to challenges sustaining their participation and influence.
- **Need for more comprehensive gender strategies:**
 - **Gender treated as a secondary concern:** Some interviewees felt that although gender issues were considered, they were not fully integrated into the overall project strategies. Instead, gender was often treated as an add-on or secondary concern rather than a central component of project planning and implementation.

- **Need for a cohesive gender strategy:** Although gender workshops and sessions were held, feedback from a governmental agency indicated a need for a more cohesive approach. This would involve connecting gender equality with the mainstream and structural objectives of the project, such as promoting long-term environmental sustainability and economic development.

6. UNINTENDED EFFECTS – POSITIVE AND NEGATIVE

a. Unintended negative effects

Indigenous leaders overburdened

The Policy's emphasis on participation and representation sometimes overburdened Indigenous leaders, who were often expected to attend numerous meetings and consultations without adequate support or compensation. This increased workload strained their responsibilities and affected their ability to focus on community needs. For example, leaders from various IPOs reported feeling overwhelmed by the demands placed on them by multiple projects and initiatives, affecting their ability to effectively represent their communities.

Conflicts and frustration due to misaligned expectations

Interviewees, including representatives from Government, AEs and IPOs noted that in some cases, a disconnect existed between the expectations of Indigenous communities and the actual outcomes of the projects.

For instance, some communities anticipated immediate economic benefits from projects like FP062 but were disappointed when these benefits were not realized as quickly as expected. This led to frustration and, in some cases, withdrawal of community support.

Additionally, the complex bureaucratic processes associated with the GCF IPs Policy were sometimes seen as barriers rather than facilitators of community development.

Tensions between Indigenous and non-Indigenous stakeholders

The implementation of projects prioritizing Indigenous rights and participation sometimes created tensions with non-Indigenous stakeholders, particularly in areas where land-use and resource management were contested. For example, the emphasis on Indigenous land rights in FP062 led to conflicts with local farmers and businesses who felt their interests were being sidelined. This unintended consequence highlighted the need for better conflict resolution mechanisms and broader stakeholder engagement strategies.

b. Unintended positive effects

Increased leadership and advocacy skills among Indigenous women

In some regions, the focus on including Indigenous women in the projects led to unexpected gains in their leadership and advocacy skills. Women who participated in project governance and consultations gained confidence and experience, which enabled them to advocate for their communities in other forums. For example, in FP121, the involvement of Indigenous women in decision-making processes empowered them to take on leadership roles within their communities and participate more actively in local governance.

Strengthening of traditional knowledge systems

Integrating traditional knowledge into project activities, such as sustainable land management and agroforestry, supported environmental outcomes and revitalized cultural practices at risk of being

lost. For example, in FP062, the use of traditional methods for forest management and the cultivation of native plant species helped strengthen the community's ties to its cultural heritage and reinforced the value of traditional knowledge among younger generations.

Enhanced collaboration between Government and Indigenous organizations

The projects fostered closer collaboration between government agencies and Indigenous organizations, which was not initially anticipated. This collaboration resulted in stronger institutional relationships and a deeper understanding of Indigenous issues among government officials. For example, the coordination between MADES and Indigenous organizations during project implementation led to the establishment of joint working groups and advisory committees that continue to influence policy and project design beyond the specific GCF-funded initiatives.

7. SUSTAINABILITY

While the GCF IPs Policy has significantly promoted sustainable development in Indigenous communities, several challenges remain. These challenges primarily involve limitations in ensuring the long-term sustainability of the projects and cultural integration issues.

Dependence on external funding: Interviewees expressed concerns about the long-term financial sustainability of the projects, particularly their reliance on external funding from the GCF. They noted there may be insufficient local resources or institutional support to sustain project activities once the GCF funding ends. This concern was particularly significant for projects like FP121 and FP062, which require ongoing financial investment for forest management and agroforestry activities.

Limited economic benefits: AEs, Indigenous organizations and governmental agencies highlighted that, while projects aimed to provide economic benefits to Indigenous communities, such as through sustainable agriculture and forestry initiatives, these often took time to materialize. This delay in tangible economic gains frequently leads to diminished community interest and engagement, affecting the long-term sustainability of projects.

Integration of traditional knowledge: While the projects tried to incorporate traditional knowledge and practices, interviewees expressed concerns that this integration was often superficial and not deeply embedded in the project design. This lack of integration could lead to a lack of genuine community ownership and engagement, affecting the long-term sustainability of project outcomes. For example, in FP062, some communities felt that their traditional agricultural practices were not adequately respected or integrated into the project's agroforestry models.

Box 3. IPs and agriculture in Paraguay

Paraguay has a complex context concerning Indigenous communities and agriculture, rooted in the historical legacy of colonization. Barbosa (2020) highlighted that the Aché ethnic group, included in FP062 and FP121, have historically been described in ethnographic literature as hunter-gatherers who did not practice agriculture, with records of their lack of agricultural knowledge dating back to the 18th century. This unfamiliarity with agriculture is often attributed to the disruption and loss of practices during colonization. Since the late 1970s, this situation has begun to change, with an increase in agricultural activities. While subsistence farming is important, a significant portion of their agricultural practices has shifted towards soybean monoculture.

Agroforestry practices differ significantly from conventional monocultures. Transitioning to these systems requires a cautious approach that respects the time and decisions of the communities involved. Unlike conventional agriculture, which typically relies on machinery, agroforestry requires much greater physical effort. It frequently depends on the labour of family units, including elderly members. Despite these

challenges, agroforestry offers significant benefits, such as soil conservation, enhanced local biodiversity and the preservation of ecosystem services. Given these demands and benefits, it is crucial to assess whether the community genuinely supports adopting these practices and, if so, to ensure appropriate technical training.

Hecht (1996) notes that many locally developed agricultural systems, including Indigenous agriculture, have evolved to incorporate adaptive mechanisms for responding to environmental variables. These mechanisms help protect crops and ensure their sustainability through to harvest. These mechanisms use renewable inputs available in the region, as well as traditional knowledge and a deep understanding of the ecological and structural characteristics of planting areas and the surrounding vegetation.

Given this distinct context, it is understandable that communities may resist adopting agricultural practices that differ from those they have historically used. Therefore, introducing new farming practices requires careful evaluation to determine if a production model change is necessary. If all parties reach a consensus, the process should include community training and clearly explaining how the new production method can benefit the community and conserve the territory's biodiversity.

Gender inclusion challenges: Sustainable development hinges on the inclusion of all community members. However, interviewees noted that despite efforts to include women in project activities, traditional gender roles and logistical challenges sometimes limit their participation. This exclusion risks the long-term social sustainability of projects by preventing the full community from benefiting and contributing to project success.

The interviews also highlighted a positive perception of the innovations introduced in GCF projects. Gender-sensitive and culturally appropriate communication strategies and establishing multilevel governance structures were widely regarded as valuable steps towards more inclusive and effective project implementation.

D. LESSONS LEARNED

Creation of multilevel governance structures: The establishment of multilevel governance structures, such as regional and national councils with Indigenous representation established in the FP062 project was viewed as an innovative approach to ensuring local ownership and participation in decision-making. These structures provided a platform for Indigenous voices to be heard and integrated into project planning and execution, enhancing the projects' legitimacy and effectiveness.

Use of visual and cultural communication tools: The projects employed visual aids and culturally relevant communication tools to facilitate better understanding and engagement with Indigenous communities and women. For example, graphic materials and local languages were used to simplify complex project concepts and processes, making them more accessible and relatable. This approach helped bridge cultural and educational gaps, fostering greater inclusion. However, interviews highlighted the need for further refinement and expansion in these innovations, particularly in addressing sustainable economic models, conflict resolution and climate resilience. Strengthening these areas will be critical to meeting the needs and priorities of Indigenous communities and ensuring long-term project sustainability.

Developing new economic models for sustainability: There was a general call from interviewees, particularly Indigenous organizations, for innovative economic models that better integrate Indigenous livelihoods with sustainable development goals. Current projects often focus on immediate environmental benefits without fully addressing long-term economic sustainability for communities. New models could include diversified income-generating activities that leverage

traditional and modern practices, such as eco-tourism, value added processing of native products, or renewable energy initiatives.

Enhanced participatory methods for conflict resolution: Further innovation will be needed in developing participatory methods for conflict resolution, particularly in areas where project activities may conflict with other land uses or stakeholder interests. Enhanced participatory models will include more robust frameworks for dialogue and negotiations that respect the rights and perspectives of all involved parties, particularly regarding overlapping land claims or resource use disputes.

Incorporating climate resilience into project designs: Interviewees suggested that future projects should incorporate more innovative approaches to climate resilience, specifically tailored to the unique vulnerabilities of Indigenous communities. These approaches could involve developing community-based adaptation plans that integrate local knowledge with scientific data to address climate impacts, such as extreme weather events, changing agricultural conditions and water scarcity.

Appendix 1. LIST OF INTERVIEWEES

FULL NAME	POSITION	AFFILIATION
Adriana Samaniego	General Directorate of Economic and Social Studies	MEF
Ana Leuterio	Indigenous Peoples Program Manager	FAO
Ana María Ferreira	Safeguards Specialist	MEF
Angela Sales	Indigenous Leader	
Cesar Cardozo	Representative of the Department of Operations	Ministry of Social Development
Claudelina Gonzales	General Secretary	INDI
Daniela Benítez	Representative of the Indigenous Women's articulation of Paraguay	Paraguay mas Verde Council
Fatima Rodriguez	Safeguards Specialist	PNUMA
Felipe Gonzales	Economics Management	MEF
Gisela Dimódica	Directorate-General for International Development Cooperation	MEF
Hernan Benitez	Representative	Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ)
Hipolito Acevei	Representative	FAPI
Ignacio Lorenzo	Director of Climate Action and Positive Biodiversity	CAF
Judith Walcott	Coordinator of the FP062 Project	PNUMA
Lilian Portillo	Focal Point	MADES
Liz Coronel	Manager of Economic Development	MEF
Maria José Mendoza	Specialist in Indigenous Subjects	MADES
Maria Luz Centurión	General Directorate of Territorial Development	MEF
María Moreno Córdoba	Senior Executive of Climate Action and Biodiversity Positive	CAF
Ninfa Rodríguez	Director	INDI
Oscar Pérez	Coordinator of the FP062 Project	MEF
Rebeca Chávez	Director of Cross-Cutting Policies	Ministry of Social Development
Tania Vera	Legal Promoters	Paraguay mas Verde Council
Víctor Enciso	Technical Assistant	INFONA
Group discussion (10-12 participants)	IPs involved in FP062 and FP121	Site visit in the Chaco region
Group discussion (10-12 participants)	IPs involved in FP062 and FP121	Site visit in San Pedro

Appendix 2. SITE VISIT PHOTOS



The FP121 Project: reforestation using traditional knowledge and plants for forestation. Group discussion with IPs members in the San Pedro region.



Community consultations on agroforestry models with IPs community members in the Chaco region, Paraguaya mas Verde Project.



Group discussion with IPs women in San Pedro, FP062 Project.

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