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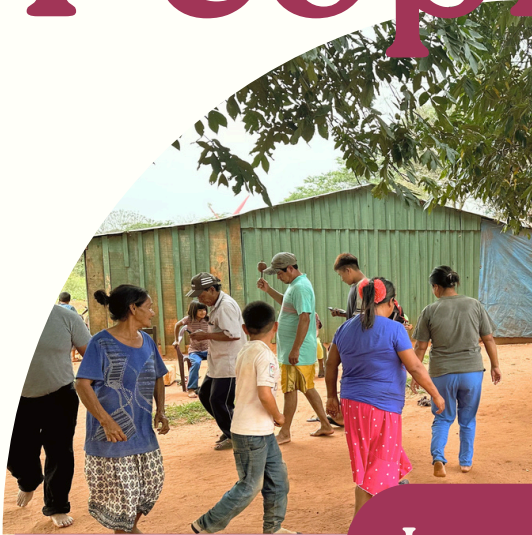
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Independent Evaluation of the Green Climate Fund's Approach to

# Indigenous Peoples



January 2025



Final report



GREEN CLIMATE FUND  
INDEPENDENT EVALUATION UNIT

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

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FINAL REPORT

01/2025

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## FOREWORD

The Independent Evaluation Unit is pleased to present the evaluation of the Green Climate Fund's (GCF) approach to Indigenous Peoples (IPs). The evaluation focuses on the relevance and effectiveness of the Fund's approach to IPs, its internal and external coherence and the extent to which the implementation of the Policy has guided GCF results.

IPs play a critical role in global efforts to adapt to and mitigate climate change. Their ancestral knowledge and practices provide a valuable foundation for mitigating the causes of the climate crisis and adapting to its impacts on ecological, social and economic systems. However, despite their support for these global efforts, mitigation and adaptation actions often threaten the rights of IPs, such as self-determination, control over lands and resources, cultural preservation, and participation in decision-making.

Since its inception, the GCF has engaged with IPs, taking steps to safeguard their rights and strengthen their engagement and participation in GCF activities. Adopting the *Indigenous Peoples Policy* in 2018 formalized this support by establishing a framework, standards and provisions for IPs across all GCF investments.

This evaluation found that the GCF's approach to IPs is anchored in a robust policy framework. Many GCF projects actively consider IPs, and the Policy has been effective in ensuring safeguards are implemented and "do-no-harm" principles are applied. However, the evaluation also revealed that the Fund has been less effective in ensuring benefits are delivered to IPs in culturally appropriate ways. While the GCF recognizes the critical role Indigenous wisdom and knowledge play in combating climate change, more effort is needed to integrate this expertise into guiding climate rationale and the implementation of GCF projects and programmes.

The evaluation's findings and recommendations aim to support the upcoming review of the IPs Policy and inform revisions to other environmental and social safeguard policies, strategic documents, guidelines, and tools planned for the GCF's future. To maintain its leadership in upholding advanced social and environmental standards, the GCF should continue updating and strengthening its social inclusion policies. This evaluation offers valuable support to the GCF in advancing its IPs Policy beyond compliance, ensuring stakeholders fully own it for more tangible and culturally relevant benefits for IPs. The evaluation also makes a case for the need for finances to reach IPs by overcoming institutional barriers and providing needed support and capacities.

We are optimistic that the GCF's pursuit of its climate mitigation and adaptation mission will strengthen its focus on IPs. This mission includes safeguarding IPs' rights and empowering them as active agents of change in projects, ensuring they benefit equally from the outcomes of GCF investments.

We owe a great deal to IPs. Their invaluable local and traditional knowledge, sustainable practices, and commitment to preserving the natural environment are crucial in the global fight against climate change.

**Andreas Reumann**

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The IEU takes full responsibility for the report, including for any errors. The views expressed in the evaluation do not represent the official views of the GCF Board, its members, or the countries they represent.

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## ABBREVIATIONS

<b>AE</b>	Accredited entity
<b>APR</b>	Annual performance report
<b>B.37</b>	Thirty-seventh meeting of the Board
<b>COP</b>	Conference of the Parties
<b>CSO</b>	Civil society organization
<b>DP</b>	Delivery partner
<b>EE</b>	Executing entity
<b>ESP</b>	Environmental and Social Policy
<b>ESS</b>	Environmental and social safeguards
<b>FAA</b>	Funded activity agreement
<b>FAO</b>	Food and Agriculture Organization of the United Nations
<b>FP</b>	Funding proposal
<b>FPIC</b>	Free, prior and informed consent
<b>FWG</b>	Facilitative Working Group
<b>GAP</b>	Gender Action Plan
<b>GCF</b>	Green Climate Fund
<b>GEF</b>	Global Environment Facility
<b>GI</b>	Governing Instrument
<b>GRM</b>	Grievance redress mechanisms
<b>HECO</b>	Heritage Colombia
<b>IAE</b>	International accredited entity
<b>IEU</b>	Independent Evaluation Unit
<b>ILO</b>	International Labour Organization
<b>IPAG</b>	Indigenous Peoples Advisory Group
<b>IPO</b>	Indigenous Peoples' Organization
<b>IPP</b>	Indigenous Peoples Plan
<b>IPPF</b>	Indigenous Peoples Planning Framework
<b>IRM</b>	Independent Redress Mechanism
<b>IRMF</b>	Integrated results management framework
<b>LCIPP</b>	Local Communities and Indigenous Peoples Platform
<b>MAF</b>	Monitoring and Accountability Framework
<b>NDA</b>	National Designated Authority
<b>ONIC</b>	Organización Nacional Indígena de Colombia

<b>OSI</b>	Office of Social Inclusion
<b>PPF</b>	Project Preparation Facility
<b>PSAA</b>	Project-specific assessment approach
<b>REDD</b>	Reducing emissions from deforestation and forest degradation
<b>RPSP</b>	Readiness and Preparatory Support Programme
<b>SAP</b>	Simplified approval process
<b>UNDP</b>	United Nations Development Programme
<b>UNDRIP</b>	United Nations Declaration on the Rights of Indigenous Peoples
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change
<b>UNHRC</b>	UN Human Rights Council
<b>UNPFII</b>	United Nations Permanent Forum on Indigenous Issues

# EXECUTIVE SUMMARY



## BACKGROUND

At the thirty-seventh meeting of the Board (B.37) of the Green Climate Fund (GCF) held in Tbilisi, Georgia, from 23 – 25 October 2023, the Board approved the Independent Evaluation Unit's (IEU) workplan for 2024. The approved workplan included a mandate for the IEU to independently evaluate the GCF's approach to Indigenous Peoples (IPs). The evaluation aimed to objectively assess the GCF's approach towards IPs, focusing on the relevance and effectiveness of the *Indigenous Peoples Policy* (hereafter referred to as "IPs Policy" or "the Policy").

The GCF's approach to IPs is anchored in its Governing Instrument (GI) paragraph 71, which states that "the Board will develop mechanisms to promote the input and participation of stakeholders, including private-sector actors, civil society organizations, vulnerable groups, women and Indigenous Peoples, in the design, development and implementation of the strategies and activities to be financed by the Fund". The United Nations Framework Convention on Climate Change (UNFCCC) recognized the rights and roles of IPs in climate action, and references to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) (2007) and the UN Human Rights Council (UNHRC) Declaration 10/4 on climate change and human rights (2009) in several UNFCCC decisions (United Nations Framework Convention on Climate Change, 2010; 2015).

Additional guidance from the Conference of the Parties (COP) to the GCF on working with IPs has been provided through various COP decisions aimed at adopting specific measures to protect IPs' rights. This guidance culminated in the request for the GCF Secretariat to develop a Fund-wide policy regarding IPs. The GCF articulated the IPs Policy adopted by the Board and contained in annex XI to decision B.19/11.<sup>1</sup> The IPs Policy aims to provide a structure that ensures GCF activities are designed and implemented in ways that respect and safeguard IPs, are culturally appropriate, and do not cause harm.

The evaluation examines the GCF's overall approach, assessing its relevance and alignment with international commitments related to IPs. It also examines how the GCF GI, the UNFCCC, and a range of IPs-related policies have shaped the Fund's approach to IPs. The evaluation also assesses the GCF's strategies for implementing the IPs Policy alongside other GCF policies. Additionally, the evaluation examines the strengths and weaknesses of key aspects of the Policy and their alignment with IPs' priorities, including integrating traditional knowledge, co-benefits for Indigenous communities, gender inclusivity, and grievance mechanisms. Finally, the evaluation addresses the role of country context, the implementation of free prior and informed consent, and compliance as underpinning factors in the Policy's implementation.

## METHODOLOGY

The evaluation used mixed methods for data-collection and analysis, as established in its approach paper (Independent Evaluation Unit, 2024b). The findings were based on an extensive documents and literature review, semi-structured interviews with more than 300 stakeholders, five case studies and analyses, syntheses, and benchmarking with comparator organizations and portfolio and data analysis led by the IEU DataLab.

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<sup>1</sup> GCF/B.19/05

## KEY FINDINGS AND CONCLUSIONS

### FINDINGS

Finding 1. The GCF's approach towards IPs is defined primarily by the Policy and supported by the environmental and social safeguards. The Policy is widely regarded for many of its strengths.

Finding 2. The Policy is consistent with the UNFCCC's guidance to the GCF. However, from a normative perspective and to align with more recent advancements in the international narrative, additional foundational and operational details are warranted.

Finding 3. GCF safeguarding policies are broadly aligned in intent towards IPs, but inconsistent terms and concepts can undermine how IPs are considered. The Policy is not fully integrated into the GCF's safeguarding policies, which may lead to inconsistent application.

Finding 4. The Indigenous Peoples Advisory Group (IPAG) was established to advise and enhance dialogue among IPs-related stakeholders within the GCF ecosystem. While the IPAG is still establishing its institutional linkages and resources, its creation holds promise for implementing the Policy effectively.

Finding 5. As outlined in its policies and strategies, the GCF's overall approach towards IPs focuses on two key areas: (i) preventing harm through safeguards, and (ii) promoting information sharing, participation and consultation. While commendable, this approach lacks a clearly defined commitment to providing IPs with specific access to resources or benefits.

Finding 6. GCF projects are expected to focus on national-level or country priorities. Its National Designated Authority (NDA)-centred and accreditation-based model presents a systematic challenge to IPs accessing GCF resources directly.

Finding 7. External evidence suggests that supporting IPs can cost-effectively and sustainably achieve mitigation and adaptation results. Yet, the GCF is the only major multilateral climate fund without a specific mechanism or commitment to support IPs.

Finding 8. The precise number of IPs beneficiaries cannot be determined, nor can the finance directed towards them be estimated. The evaluation team estimates 128 GCF projects include activities relevant to IPs.

Finding 9. International accredited entities (IAEs) manage a larger proportion of the GCF's IPs-relevant projects. Most of these projects are either medium or small in size and present a category B level of environmental or social risk.

Finding 10. The GCF's approach to IPs is perceived primarily as a compliance exercise rather than an opportunity to harness the contribution of IPs in implementing climate actions and achieving meaningful results. The Policy's compliance-driven approach disincentivizes AEs from developing meaningful projects involving IPs, potentially leading to their exclusion from GCF projects.

Finding 11. Alternative access modalities like simplified approval process (SAP) and project-specific assessment approach (PSAA) and technical assistance modalities like Project Preparation Facility (PPF) do not sufficiently integrate IPs considerations or specifically support IPs-relevant projects.

Finding 12. Readiness and Preparatory Support Programme (RPSP) can be a crucial and effective modality for integrating IPs' considerations into GCF programming. Yet, the use of RPSP has been opportunistic.

Finding 13. The Policy and other strategy and policy decisions by the Board encourage integrating traditional knowledge into projects and GCF-financed activities where suitable. However, this



evaluation finds that applying this knowledge depends on the time and resources available to AEs. When utilized, this knowledge enhances project relevance and sustainability.

Finding 14. As the GCF lacks portfolio-level commitments focusing on IPs, its monitoring and results measurement systems do not track or monitor specific IPs-related indicators, making it impossible to assess Fund-wide results regarding IPs.

Finding 15. While a portfolio-level assessment of results is not feasible, some emerging outcomes are visible in individual projects. The evaluation finds that IPs project-level outcomes correlate with national contexts and power dynamics among actors. The outcomes can be affected by the level of meaningful participation of IPs in project decision-making processes and benefit-sharing mechanisms.

Finding 16. The GCF's monitoring framework does not mandate tracking or reporting co-benefits specifically related to IPs, resulting in the GCF missing the opportunity to assess and understand the broader impacts of its funded projects on IPs. The scope of co-benefit remains limited during the design, approval, and monitoring phases.

Finding 17. Despite the general alignment of GCF policies on gender, Indigenous women are not systematically targeted by IPs-relevant projects. The participation of Indigenous women is limited to capacity-building efforts, not amounting to proactive empowerment. The case studies offer a glimpse of diverse activities targeting Indigenous women.

Finding 18. The GCF provides an architecture for grievance redress, accessible to IPs through three channels: at the project level, at the accredited entity (AE)'s level, and by approaching the GCF's Independent Redress Mechanism (IRM). IPs face general issues in accessing redress using the GCF's architecture.

Finding 19. There is mixed evidence on the effectiveness of grievance redress mechanisms (GRMs) at the project level. In some cases, the GCF's IRM has addressed grievances, including those related to project closure. An important lesson from the IRM's experience is the importance of an exit strategy for projects, which GCF does not have.

Finding 20. While the Policy's application is broad in scope, its implementation is rooted in and subject to the national context, where the GCF does not play a proactive role. Consequently, the Policy's implementation is highly variable and falls outside the GCF's direct sphere of influence.

Finding 21. The Policy frames the use of free, prior and informed consent (FPIC) as a generally well-intentioned iterative process. In practice, however, FPIC is limited by scope of its application, timing in project origination (which can view FPIC as a one-off event rather than a continuous process), and the availability of resources to support the good faith negotiations expected by the GCF.

Finding 22. The evaluation finds mixed evidence on using FPIC to empower IPs to actively shape or reject GCF projects. However, in cases where IPs are able to shape the consent process meaningfully, it leads to sustainable project outcomes.

Finding 23. Due to inconsistencies in the documentation regarding the oversight of the Policy's implementation after project approval, it is not possible to draw a more significant conclusion on its effectiveness. Monitoring of compliance requirements has limitations, which can expose the GCF and IPs to risks.

## KEY CONCLUSIONS AND RECOMMENDATIONS

### KEY CONCLUSIONS

The GCF is a vital pillar in climate finance's global architecture. Its prominent position in this architecture means the GCF's approach to IPs extends beyond its articulation and implementation. It also sets a normative precedent, shaping the broader discourse on IPs and climate finance. Against this background, the GCF's approach to IPs demonstrates many notable strengths while presenting significant opportunities for improvement.

At the time of its approval, the GCF's policy framework set a relatively high standard, conveying a worthy message across its vast network about the historical and rightful position of IPs in climate ambition. Nevertheless, this evaluation identified two key dimensions of the Fund's approach related to the GCF's position and contributions.

On the one hand, the GCF aspires to enhance the rights of IPs and channels climate finance to several projects around the world that directly benefit IPs. The GCF's ability to programme at scale, regardless of a country's income status, and to provide highly concessional support targeting vulnerable and marginalized communities represents a powerful signal and a meaningful contribution. Currently, the GCF emphasizes a "do-no-harm" approach, focusing on safeguarding IPs from any potential adverse impacts caused by its projects. This approach is commendable. However, this approach is not fully implemented as intended. Several institutional measures can be corrected to improve this implementation. For instance, to fully realize its compliance-focused approach, many aspects of compliance need to be established, reinforced or calibrated. Additionally, the use and integration of traditional knowledge in GCF activities remain limited.

While the GCF positions itself as a second-level due diligence institution in matters related to IPs, it has yet to strike a balance between applying the Policy flexibly and ensuring compliance with minimum standards across the immense diversity of projects and AEs. For example, FPIC remains more of an art than a science, posing an ongoing challenge for the GCF to ensure that FPIC is fully followed as intended by the Policy and that a robust FPIC process contributes positively to a project's results. Similarly, the rights and concerns of IPs are to be further ensured and addressed when project-level GRMs function effectively. However, GRM mechanisms face challenges related to access by IPs and limited oversight of their reporting.

The second dimension relates to parts of the Policy that aspires to enhance the rights of IPs. The Policy's implementation is rooted in and subject to the national context. Without state recognition, the GCF has limited means to operationalize certain aspects of the Policy, particularly provisions that affirm the right of IPs to own, use, develop and control lands, territories, and resources, as well as other assertive elements of the Policy. Therefore, the effectiveness of GCF FPs is subject to national contexts and how national legal frameworks perceive IPs. GCF projects often navigate the challenge by avoiding programming directly with IPs or not formally identifying them as such. This approach can create a paradox where, despite the Policy's intentions, GCF resources may fail to address the needs of IPs, further disadvantaging these already socially and environmentally vulnerable communities. While the Policy is well-intentioned, its implementation needs more significant support, some of which fall within the GCF's sphere of responsibilities and opportunities. Although the Policy is perceived as flexible enough to accommodate various national contexts, this flexibility has also led to multiple interpretations and ambiguities. These issues are not clearly addressed in the Policy's Operational Guidelines. The GCF lacks mechanisms for tracking and reporting IPs-related outcomes at the portfolio level, with similarly limited capacity at the project

level. This presents challenges to managing IPs' contributions and results. Furthermore, the evaluation finds that the GCF's contributions to IPs are currently limited to financial resources. There is no evidence to suggest that the GCF independently advances the welfare of IPs beyond the provision of funding. The added value of the GCF comes from the availability of resources in contexts where IPs can access its support.

The evaluation concludes in its review of the implementation of the IPs Policy that certain aspirations of the Policy, including those related to rights, recognition and resources, are not fully operationalized. This evaluation finds no indication that the GCF has contributed to a paradigm shift for IPs. Its contributions remain confined to providing financial resources and safeguarding rather than catalysing transformational change through policy change, depth of change, sustainable impact and knowledge-sharing, which are the signs of a transformational change.

A core issue is the challenge IPs face in directly accessing climate finance through the GCF. This evaluation finds that the GCF's business model is not directed to focus on supporting IPs, with its modalities, funding windows, and processes lacking the nuanced mechanisms and flexibility needed to cater specifically to IPs or provide them with direct benefits. Due to its passive approach to project origination and focus on countries and AEs, the GCF has not actively pursued a portfolio with IPs. Access to the GCF is already perceived to be a challenge regardless of the capacity of the recipient country or the AE. For IPs, this challenge is often compounded to the point of being insurmountable.

Confronting this challenge presents the GCF with a critical opportunity to adopt a more intentional and proactive approach to advancing climate action through and for IPs. Indeed, evidence shows that when IPs and Indigenous Peoples' Organizations (IPOs) are meaningfully consulted and purposefully integrated into climate activities, the results are overwhelmingly positive for climate outcomes.

The international narrative on IPs has matured since the GCF Board adopted the Policy in 2018. This change was evident in COP29's decision to elevate the voices of IPs, and the emphasis placed on IPs in the Global Biodiversity Framework adopted in 2022 under the Convention on Biological Diversity (Convention on Biological Diversity, 2022). While the evaluation acknowledges the significance of these global outcomes, a future review of the Policy and its accompanying Operational Guidelines would present an opportunity to more clearly define GCF's important role in supporting IPs in implementing climate action.

## KEY RECOMMENDATIONS

This evaluation makes five key recommendations, from urgent, short-term actions to long-term strategies. The first three focus on reinforcing the GCF's "do-no-harm" approach to IPs. The latter two consider possible strategies the GCF can adopt to better benefit IPs.

**Recommendation 1. In the short term, the GCF should continue to reinforce the IPs Policy and Operational Guidelines while calibrating its operational tools to fully implement the intended objectives of the Policy.**

The evaluation found that the Policy is well regarded for many of its provisions. However, there is room for greater clarity and certainty. Further adjustments are necessary to fully integrate it into the GCF programme and operations if its intended objectives are to be fully implemented. The Board and the Secretariat should consider the following actions.

- Promote awareness among NDAs and AEs of the Policy's intent, including by leveraging the IPAG's legitimacy and expertise.

- Update the Operational Guidelines to include and address key areas such as benefit-sharing mechanisms, grievance redress integration, consultation standards, and the curation and integration of IPs' climate knowledge. Further, operationalize the inclusion of traditional knowledge in FPs and implementation with specific guidelines and operational tools.
- Future IPs Policy updates should reflect the intent of emerging normative priorities, such as locally led adaptation, enhanced participatory governance, and the integration of traditional knowledge. The GCF should maintain its efforts to lead by example by aligning the Policy with the standards set by UNDRIP and International Labour Organization Convention 169, supporting the self-determination rights of IPs in climate action. Additionally, the GCF should continue leveraging links with platforms like the Local Communities and Indigenous Peoples Platform (LCIPP) to ensure alignment with evolving normative guidance.

**Recommendation 2. In the short to medium term, the GCF Secretariat should establish mechanisms and provide resources, including technical and financial support, for the effective implementation of the IPs Policy, in line with its aspirations.**

To ensure the Policy achieves its intended objectives, the GCF Board and the Secretariat should focus on enabling its effective implementation by providing clear pathways and support mechanisms. The following actions should be prioritized.

- Creating an enabling environment for IPs:
  - The GCF should acknowledge and support extra time, expertise, and funding needed to involve IPs in projects effectively.
  - The Secretariat should further integrate the Policy into GCF operational and strategic documents. When reviewing country ownership principles, consider the lessons from implementing the Policy in different national contexts. The GCF should consider (i) introducing nudges and incentives for AEs and NDAs to support the Policy's implementation, and (ii) establishing institutional mechanisms and provision of resources to encourage AEs to develop IPs-focused projects. These could include simplified processes, technical support, additional funding to strengthen compliance with the Policy when IPs are included, and support for applying traditional knowledge in climate actions.
  - The GCF should consider exploring opportunities to advance the narrative on IPs in contexts where the full intent of the Policy cannot be implemented due to preceding national legislation. The GCF can facilitate dialogues between IPs and NDAs, support the development of country programmes that embrace IPs, and seek guidance from IPAG and LCIPP.
  - The Secretariat should consider providing greater flexibility and opportunities to intentionally stimulate the development of IPs-focused projects, actively fostering their growth rather than passively waiting for them to emerge. For instance, the Secretariat should explore the use of measures that may include, but are not limited to,
    - + Allocating resources to support FPIC processes that involve IPs.
    - + Offering concessional finance for activities involving IPs, particularly to incentivize private-sector AEs to programme projects with the IPs in a way that meets the aspirations of the Policy.
    - + Allowing flexibility in linking Indigenous traditional knowledge with project origination and activities.
- Tailoring GCF's support modalities to better target IPs:

- Leverage the PPF. Optimize and utilize the PPF to support addressing the needs of IPs at the initiation of project design. This would involve providing resources to reach IPs communities, ensuring meaningful IPs participation throughout the GCF project cycle, supporting FPIC-related activities and improving Indigenous Peoples Plans (IPPs) and Indigenous Peoples Planning Frameworks (IPPFs).
- Maximize RPSP potential. Expand the RPSP to support the engagement of IPs in national climate investment planning and facilitate Indigenous-driven proposals. This would include ensuring purposeful engagement with IPs by supporting FPIC and conducting meaningful consultations with IPs throughout the GCF project cycle.
- Harness Readiness Results Management Framework opportunities. Provide the Framework with the means to monitor the engagement and contribution of IPs. Further support the Policy's implementation by developing guidelines through readiness, including clear guidance for delivery partners (DPs) and NDAs in effectively engaging with IPs.
- Improving monitoring in projects involving IPs:
  - Develop and implement specific indicators, including disaggregated data on IPs, to monitor benefits and results for IPs across the project portfolio.
  - Develop project-level indicators for AE-led evaluation and capture co-benefits to ensure accountability and measurement of project progress. Improve tagging and further refine the definitions of IPs used by the GCF.
  - Track changes in gender equality through GCF projects. Integrate gender-disaggregated data into IPs-relevant projects and track gender-specific outcomes, focusing on empowering Indigenous women and addressing their unique challenges and potentials.

**Recommendation 3. The GCF should urgently address the limitations in its planned oversight of compliance, ensuring sufficient flexibility to adapt the Policy to a diversity of contexts and non-compliance risks.**

Given its second-level due diligence role and compliance-based architecture, the GCF should address the burden of compliance and the risks of non-compliance. This evaluation recommends a non-exhaustive list of possible measures and operational recommendations to explore, as listed below.

- First, reinforce the oversight of adherence to the Policy at project approval and during implementation, as even a small risk of non-compliance with GCF policies can have serious consequences for already vulnerable IPs. The GCF Secretariat should support AEs in complying with the Policy's provisions and intended objectives. This support can include (i) enhancing IPs-relevant information in monitoring, reporting and evaluation tools such as annual performance reports (APRs) and AE-led evaluations, (ii) strengthening IPO networks to support oversight and integrating information about IPs in the Integrated Results Management Framework (IRMF) and the Monitoring and Accountability Framework (MAF), and (iii) providing AEs with support and flexibility in delivering this information.
- Second, the GCF needs to build its capacity to monitor compliance. Building the capacity of the Secretariat by mainstreaming the Policy can play a key role in this effort. As the Secretariat launches operations under a new structure, ensuring the compliance function remains strong from an IPs perspective is vital. For instance, initiatives such as staff training and sensitization and enhancing human resources for better engagement with IPs, AEs and NDAs should continue to be explored to sustain the meaningful involvement of IPs throughout the project cycle.

- Third, the IPAG's role in project review and monitoring can be strengthened, as it is currently limited. Achieving this requires clarifying and formalizing its institutional links with various GCF entities, such as the Board, different areas of the Secretariat, NDAs, AEs and other strategic partners. Additionally, its resourcing should align with any evolution in its increasing roles and responsibilities. The GCF should further actively engage with NDAs and AEs on IPs issues, build a cadre of IPs and IPOs able to engage with NDAs and AEs across countries, and ensure more prominent and vigilant monitoring of the Policy's components.
- Fourth, the Secretariat should enhance compliance mechanisms and monitoring tools at the operational level to ensure effective implementation of the Policy across GCF portfolio. This can be achieved by (i) establishing minimum standards and providing templates for IPPFs and IPPs, and (ii) revising section 4 of the APRs to include a dedicated section on IPs. This section should be completed for projects implemented in IPs' territories. It should include updates on the progress of IPPs and guide AEs on how to complete it.
- Finally, the GCF should continue building and promoting grievance mechanisms at all levels, ensuring they are accessible to IPs communities while respecting their systems and institutions. Additionally, the GCF should consider the role of IPOs and civil society actors in supporting the monitoring of IP-related operations within GCF projects. The evaluation also highlights the need for an exit strategy for projects upon completion or suspension.

**Recommendation 4. In the medium to long-term, the GCF must address fundamental systemic barriers within the business model that limit the extent to which IPs can access the GCF. The GCF should consider an IPs-specific window or programme.**

The Policy states that the GCF may allocate funds to support IPs if required and if they are not adequately benefiting from GCF support. This evaluation recommends operationalizing these provisions and establishing a specific window for the GCF to consider a specific strategic and portfolio commitment towards the IPs. Such a window would include several elements at once:

- Strategic portfolio commitment. With this window, the evaluation recommends allocating a dedicated portion of the GCF resource envelope. The window's strategic focus should provide IPs access to GCF resources through institutional processes customized to meet their unique needs and respect their cultures.
- Customized business model. The window should leverage the social capital and intermediary role of trusted IPOs and relevant organizations engaging with IPs and IPAG to the extent possible. It should use the existing capacity of IPOs or other trusted partners with a proven track record, established trust and requisite experience in working with specific IPs communities. Further, the processes under the window should accommodate the opportunities and limitations of working with such partners.
- An IPs-oriented culture. The full exploration of the window should be underpinned by an institutional structure and organizational culture that regards IPs as rightful stewards and custodians of resources and territories. The window should include dedicated resources and time for project preparation with IPs. This could encompass allocated resources for FPIC throughout the project cycle, acknowledgement of traditional knowledge and practices, capacity-building, and covering additional financial costs associated with engaging IPs. It should also account for the relatively small ticket size, longer time frames, greater flexibility and resources required, and a qualitatively suitable approach based on meaningful consultations throughout the project.

- Outcomes. This window would enable the GCF to move beyond one-off and project-level benefits towards an intentional paradigm shift for IPs. Providing a systemic and deliberate means to directing the benefits of GCF support to IPs, this window would align the GCF with other climate funds while creating opportunities for effective and sustainable pathways towards achieving a paradigm shift.

**Recommendation 5. The GCF must further clarify its strategic position on IPs beyond seeking inputs before projects. As the GCF articulates its position/stance through ongoing restructuring and strategic decisions, providing clear direction on its approach to IPs is essential.**

There are several areas where the GCF could clarify its approach, as listed below.

- The GCF's position on the balance between flexibility and prescription. Clarity regarding this balance is essential to reconcile the risk of noncompliance with GCF policies on the one hand and trust, flexibility, and project autonomy on the other. This should be clearly defined in guidelines and operational tools.
- The GCF's approach to IPs and whether it intends to remain a passive, second-level due diligence institution or actively support IPs. While the GCF explores increased orientation towards regions, it should clarify its position on the rights of IPs and strengthen IPs' institutions and their role within national discourses.
- The GCF's use of its high-profile. This evaluation recommends that the Fund use its prominent position in climate finance architecture to set the standards for good faith negotiations, engagement and empowerment of IPs in climate action project design and implementation.
- The GCF's enabling role. Given the Fund's increasingly specialized orientation towards the regions, the evaluation recommends the GCF explore its potential to create enabling environments for IPs to engage in climate action. More broadly, it should shift the GCF's organizational culture from a focus on compliance to a meaningful engagement with IPs.





# MAIN REPORT



## Chapter 1. INTRODUCTION

### A. PURPOSE AND SCOPE

1. The Independent Evaluation Unit (IEU) undertook this Independent Evaluation of the Green Climate Fund's Approach to Indigenous Peoples (IPs) as part of its Board-approved 2024 workplan. The evaluation primarily aimed to assess the relevance and effectiveness of the Green Climate Fund's (GCF) approach to IPs, including applying environmental and social (ESS) standards<sup>2</sup> and sharing programme or project benefits with IPs. The evaluation also assessed the internal and external coherence of the GCF's *Indigenous Peoples Policy* (hereafter referred to as "IPs Policy" or "the Policy") and the extent to which the Policy's implementation has guided GCF results.

### B. EVALUATION FRAMEWORK AND METHODS

2. The evaluation team approached its work fully dedicated to respecting IPs, guided by the evaluation questions and aligned with the GCF evaluation standards. The evaluation framework was based on a desk review of GCF documents and records, along with key informant interviews and focus group discussions (FGDs) with GCF staff and partners, Indigenous Peoples Advisory Group (IPAG), IPs experts, and Indigenous Peoples' Organizations (IPOs). Although the evaluation's requirements and timeline constrained the application of Indigenous Evaluative Frameworks, the evaluation team has strived to incorporate culturally sensitive approaches. The evaluation employed a theory-based approach to deliver practical insights for the GCF Board, Secretariat, partners, stakeholders, and the public. Its purpose is to foster learning, ensure accountability and encourage dialogue. The full methodology can be seen in volume II of this report.
3. The evaluation used a mixed methods approach, incorporating qualitative and quantitative methods for data-collection, data set building, and data analysis. Key methods for data gathering included the following:
  - Desk research and literature review of peer-reviewed literature, grey literature and GCF policy documents
  - Benchmarking GCF and other climate finance providers against global standards for IPs engagement
  - A qualitative and quantitative portfolio review comprising 178 projects, of which 128 were deemed relevant to IPs<sup>3</sup>
  - Semi-structured interviews and FGDs involving 325 respondents, as listed in Annex 1<sup>4</sup>

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<sup>2</sup> In decision B.07/02, the Board adopted, on an interim basis, the Environmental and Social Performance Standards of the International Finance Corporation as the interim ESS of the GCF.

<sup>3</sup> The cutoff date for data updates, approved APRs and decisions on IPs was 31 October 2024. For details of selection methodology, please refer paragraph 52 of this report and volume II.

<sup>4</sup> IPs communities visited include (i) [Paraguay] the Paz del Chaco, Ava Guarani and Mbya Guarani Indigenous communities, (ii) [Philippines] the Daraguyan tribe, Kitanglad, Bukidnon, (iii) [Botswana] the San people, the Ju/'hoansi and the Herrero people, (iv) [Colombia] the Zenú people and Afro-Colombian communities, and (v) [Vanuatu] communities in the Nguna and Efate regions.

- Five country case studies<sup>5</sup>
  - Synthesis of previous IEU evaluations<sup>6</sup>
4. A note on terminology is warranted. Many of the quotes in this report do not capitalize the terms "Indigenous" or "Indigenous Peoples", reflecting that their source documents were written before the recent emphasis on capitalizing these terms as a sign of respect for IPs and their distinct cultures and histories. This report capitalizes "Indigenous" and "Indigenous Peoples" where the terms appear outside these quotes.

## C. LIMITATIONS

5. The evaluation faced numerous data-collection and analysis limitations. Some challenges included the following:
- **Data quality and availability:** GCF's portfolio data on IPs, including IPs as direct beneficiaries, investment impacts, and co-benefits, were not tracked with specific or disaggregated indicators. Also, GCF's AI-based tagging system may have misclassified projects. Budget tracking and disbursement at the activity level for IPs-related activities were unavailable for most projects, preventing a granular and consistent analysis of financial investments targeting IPs.
  - **Data reliability:** The data are self-reported by accredited entities (AEs) through annual performance reports (APRs) with limited quality assurance from the Secretariat.
  - **Generalizability:** The evaluation team also faced challenges related to internal validity and reliability of findings. Internal validity was further challenged by the limited purposive sample of cases analysed, making it difficult to draw conclusions about the overall performance of the GCF portfolio given the diversity of IPs.
  - **Evolving institutional context:** At the time of the evaluation, the GCF was restructuring its management structure and business processes to improve project review and approval processes, including reorganizing the Office of Social Inclusion (OSI).
6. The evaluation used diverse strategies to address these limitations, such as proxy indicators, intercoder reliability, consistency across coders, cross-validation, diversity of data sources and triangulation, qualitative data, expanded evidence gathered by country case studies, and recognizing how data quality and reliability affected interpretation. As a result, the evaluation team is confident in the quality of the report's findings.

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<sup>5</sup> Criteria to select Botswana, Philippines, Colombia, Paraguay and Vanuatu for case studies can be seen in the approach paper.

<sup>6</sup> A total of 18 IEU evaluations and country cases studies covering IPs as a cross-cutting issue were published from 2018 to 2024.

## Chapter 2. INSTITUTIONAL ARCHITECTURE REGARDING IPS

### A. POLICY APPROACH OF THE GCF

7. **Finding 1. The GCF's approach towards IPs is defined primarily by the Policy and supported by the ESS. The Policy is widely regarded for many of its strengths.**
8. The GCF's IPs-relevant policy architecture includes a specific policy and provisions from other policies. The Policy was adopted by Board decision B.19/11 in 2018. It assists the GCF in incorporating considerations related to IPs into its decision-making while working towards climate change mitigation and adaptation goals. The Policy's overall objective is

to provide a structure for ensuring that activities of GCF are developed and implemented in such a way that fosters full respect, promotion, and safeguarding of indigenous peoples so that they (a) benefit from GCF activities and projects in a culturally appropriate manner; and (b) do not suffer harm or adverse effects from the design and implementation of GCF-financed activities.

The Policy's requirements and the related environmental and social safeguards are further explained in the *Operational Guidelines: Indigenous Peoples Policy* (hereafter referred to as "Operational Guidelines") to assist AEs in meeting the Policy requirements.

9. The Policy includes 13 specific objectives and eight guiding principles, covering its two primary purposes: (i) promoting benefits for IPs, and (ii) protecting them from harm or adverse impacts. The Policy applies to all IPs regardless of their economic, political or social vulnerabilities while acknowledging that such vulnerabilities will be accounted for in designing and planning climate action investments. The Policy applies to the following people and groups: IPs, local communities, historically underserved traditional local communities (sub-Saharan African), Indigenous ethnic minorities, Afro-descendent communities (South America and the Caribbean), ethnic groups, aboriginals, hill tribes, vulnerable and marginalized groups, minority nationalities, scheduled tribes, first nations, tribal groups, pastoralists, hunter-gatherers, nomadic groups, and forest dwellers. (no reference is made to scheduled castes or communities, nor people of gypsy and Romany heritage.) The Policy applies whenever "Indigenous Peoples are present in, have, or had a collective attachment or right to areas where GCF-financed activities will be implemented". This includes where IPs have lost collective attachment to distinct habitats or ancestral territories because of forced severance, conflict, government resettlement programmes, dispossession of their land, natural disasters, or incorporation of such territories into an urban area where IPs have established distinct communities but still possess the characteristics of a distinct social and cultural group.
10. In addition to the Policy, the Revised Environmental and Social Policy (ESP), adopted by Board decision B.BM-2021/18, reflects the GCF's commitment to

give due consideration to persons in vulnerable positions and situations and marginalized populations, groups, and individuals, including women and girls, local communities, IPs, and other marginalized groups of people and individuals that are

affected or potentially affected by GCF-financed activities and are especially vulnerable to exploitation or other potentially harmful unintended project impacts.<sup>7</sup>

Concerning IPs, the revised Policy states that all GCF-financed activities will avoid adverse impacts on IPs and support their full and effective participation.<sup>8</sup>

11. Additionally, in decision B.33/12 paragraph (h), the Board decided that the use of the best available information and data, including from the Intergovernmental Panel on Climate Change and traditional, local, and Indigenous knowledge and practices, is sufficient to form the basis for the demonstration of impact potential for GCF-supported activities while taking into account the context of the proposal, the different capabilities of accredited entities, and country and regional circumstances.
12. Most interview respondents regard the Policy as a sound and encompassing document that aligns with the contemporaneous discourse on IPs. For instance, the Policy is well regarded for features such as respect for self-identification, its applicability in the absence of legal recognition or state identification by a state, and its broad scope of application. Some of the Policy's provisions are considered notably more advanced than those of comparable institutions, especially considering that it was implemented as far back as 2018. For example, unlike the GCF, the Global Environment Facility (GEF) does not have a specific policy on IPs.<sup>9</sup> Furthermore, in a positive contrast to many other financial institutions, the Policy applies to IPs regardless of their economic, political or social vulnerabilities. Moreover, given the scope and scale of future GCF projects and the Policy's unequivocal precedence over other potentially contradictory GCF policies, the Policy receives considerable appreciation from interviewed stakeholders.
13. **Finding 2. The Policy is consistent with the UNFCCC's guidance to the GCF. However, from a normative perspective and to align with more recent advancements in the international narrative, additional foundational and operational details are warranted.**
14. The UNFCCC has increasingly referred to specific IPs' issues, culminating in the Paris Agreement that recognized the rights and roles of IPs in climate action and led to the establishment of Local Communities and Indigenous Peoples Platform (LCIPP).<sup>10</sup> Further, the UNFCCC has referred to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) (2007) and the UNHRC Declaration 10/4 on climate change and human rights (2009) in several UNFCCC decisions.<sup>11</sup> The positioning of IPs within the UNFCCC was supplemented most recently when COP29 adopted the Baku Workplan and renewed the mandate of the LCIPP's Facilitative Working Group (FWG). More specifically to the GCF, the UNFCCC has provided some specific guidance, including:
  - Paragraph 71 of the GCF Governing Instrument (GI) states that "The Board will develop mechanisms to promote the input and participation of stakeholders, including private-sector actors, civil society organizations, vulnerable groups, women and Indigenous Peoples, in the design, development and implementation of the strategies and activities to be financed by the Fund".<sup>12</sup>
  - COP20 welcomed the report of the Adaptation Committee that encouraged the GCF to "enhance [its] consideration of local, indigenous and traditional knowledge and practices and

<sup>7</sup> Revised Environmental and Social Policy, paragraph 3(d).

<sup>8</sup> Revised Environmental and Social Policy, paragraph 8(q).

<sup>9</sup> The GEF has adopted 'Principles and Guidelines for Engagement with Indigenous Peoples', and its policy on ESS includes a minimum standard dedicated to IPs.

<sup>10</sup> Decision 1/CP.21.

<sup>11</sup> Decision 1/CP.16; Decision 1/CP.21; Decision 2/CP.23; Decision 2/CP.24.

<sup>12</sup> Decision 3/CP.17 presented in UNFCCC document FCCC/CP/2011/9/Add.1(paragraph 71).

their integration into adaptation planning and practices, as well as procedures for monitoring, evaluation and reporting”.<sup>13</sup>

- COP26 guidance encouraged the GCF Board “to further clarify the role of data and information from, inter alia, the Intergovernmental Panel on Climate Change, and local and traditional knowledge, and practices in the assessment of concept notes, project preparation funding applications, and funding proposals.”<sup>14</sup>
  - COP27 urged the GCF Board to “continue incorporating indigenous peoples’ and local communities’ interests, perspectives, knowledge and climate priorities into its decision-making, including through its indigenous peoples policy and the recommendations of the Indigenous Peoples Advisory Group (IPAG) as well as through continued engagement with, inter alia, the LCIPP FWG and the International Indigenous Peoples’ Forum on Climate Change.”<sup>15,16</sup>
15. This guidance from the UNFCCC guidance has covered key dimensions<sup>17</sup> such as IPs’ participation in project design, using traditional knowledge, and incorporating advice from IPs into the Board’s decision-making. Subsequently, the GCF’s designed approach is articulated through the policy infrastructure, including the IPs Policy, Board decisions and the ESS. UNFCCC guidance generally operates at the level of principles, and the Policy and its accompanying framework align well with this guidance.
16. Separate from the UNFCCC, the global discourse on IPs is guided by various platforms within or associated with the United Nations, along with various multi- and bilateral declarations, conventions and agreements.<sup>18</sup> IPs and experts consider the following five to have the highest legitimacy and recognition:
- International Labour Organization (ILO) Convention 169 (1989)<sup>19</sup>
  - United Nations Declaration on the Rights of Indigenous Peoples<sup>20</sup>
  - United Nations Permanent Forum on Indigenous Issues (UNPFII)
  - Expert Mechanism on the Rights of Indigenous Peoples of the Human Rights Council
  - Special Rapporteur on the Rights of Indigenous Peoples
17. Compared with the directions set out in these normative platforms, there are limitations in the alignment of the GCF’s policy architecture, particularly with the principles set out in the UNDRIP and ILO 169, which the Policy considers among its guiding principles. However, the Policy and its

<sup>13</sup> Decision 4/CP.20, Annex, paragraph 5 (b).

<sup>14</sup> Decision 6/CP.26, paragraph 7.

<sup>15</sup> Decision 16/CP.27, paragraph 20.

<sup>16</sup> For more details on International Indigenous Peoples Forum on Climate Change, please see <http://www.iipfcc.org>.

<sup>17</sup> UNFCCC guidance to GCF decisions. For example, “participation in project design” was covered in Decision 1/CP.26 Glasgow Climate Pact, and the use of Indigenous traditional knowledge into Board’s decision-making was covered in COP guidance to GCF. “Participation in project design” was not covered in COP guidance to GCF in verbatim, unless “traditional...in the assessment of concept notes, project preparation funding applications and funding proposals” (Decision 6/CP.26, para. 7) is considered as project design.

<sup>18</sup> IPs Policy and Operational Guidelines list the following conventions as relevant to IPs’ issues – International Covenant on Economic, Social and Cultural Rights, International Covenant on Civil and Political Rights, International Convention on the Elimination of All Forms of Racial Discrimination, Convention on the Rights of the Child, Convention on the Protection and Promotion of Diversity of Cultural Expressions, Convention on the Elimination of Discrimination Against Women, Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Convention for the Safeguarding of Intangible Cultural Heritage, Convention Concerning the Protection of the World Cultural and Natural Heritage, United Nations Framework Convention on Climate Change – Decision 1/CP.16 Warsaw Framework for REDD+, Cancun Agreement (decision 1/CP.16), Convention on Biological Diversity.

<sup>19</sup> International Labour Organization (1989).

<sup>20</sup> A/RES/61/295. UN Declaration on the Rights of Indigenous Peoples. Available at <https://documents.un.org/doc/undoc/gen/n06/512/07/pdf/n0651207.pdf>.

operational documents do not provide sufficient clarity and specificity in several key areas. These include the following and are also addressed in more detail later in the report:

- **Free, prior and informed consent (FPIC):** The stated purpose of the Policy is to assist in incorporating IPs considerations into GCF decision-making while working towards climate change mitigation and adaptation goals. The Policy regards FPIC as a means of consultation, not an instrument for self-determined consent. ILO 169 and UNDRIP are much more explicit and include provisions for IPs to determine their development pathways.
- **Self-determination:** The Policy aligns with UNDRIP's articles 3, 4, and 5, which acknowledge the right of IPs to self-determination. However, with the GCF business model's limitations in facilitating governance-related questions, there is no explanation – and thus no expectation – of how GCF-funded climate action can contribute to and support IPs in their self-governance and autonomy.
- **Local and traditional knowledge and practices:** The introduction to the IPs Policy refers to a UNFCCC COP recommendation to GCF “to enhance [its] consideration of local, indigenous and traditional knowledge and practices and their integration into adaptation planning and practices, as well as procedures for monitoring, evaluation and reporting.” This is reaffirmed by the Board decision B.33/12, which determined that the use of best available information and data, including from traditional, local and indigenous knowledge and practices, is sufficient to form the basis for demonstrating impact potential for GCF-supported activities. However, there is potential to provide specific guidance to GCF stakeholders on achieving this. A wealth of external assessment and guidance is available to support the GCF in enhancing compliance with this UNFCCC recommendation.<sup>21</sup>
- **Access to resources and benefits:** UNDRIP's article 39 affirms the right of IPs “to have access to financial and technical assistance from States and through international cooperation, for the enjoyment of the rights contained in this Declaration”. As described below in the report, the GCF is instead focused on anticipating and avoiding adverse impacts on the one hand and enabling IPs to be informed/ consulted/ have opportunities to participate in project design and the determination of project implementation arrangements on the other hand.
- **Knowledge and practice:** There is a gap in the Policy regarding contributions to the sustainability of IPs' knowledge and practice. The knowledge of IPs is regarded as something to be respected and protected rather than actively used as a basis for climate action. Related to this is the broad acknowledgement that formal and informal education is crucial for sustaining knowledge systems, as expressed in UNDRIP's articles 14 and 15.
- **Specific rights.** Regarding the right to environmental conservation and protection seen in the international discourse, paragraph 11 (g) of the Policy affirms the rights of IPs to “develop and control the lands, territories, and resources that they possess”. As stated in the introduction of the Policy, the economic, social, and legal status of IPs frequently limits their capacity to defend their rights to and interests concerning land, territories, and natural and cultural resources. Consequently, the legal status of IPs may restrict their ability to participate in and benefit from development initiatives and climate change actions. The cultural importance of lands and ownership rights are recognized in the Policy. Still, the Policy does not directly address usufruct rights, including access to common land and passage for mobility. Neither does it address the protection of land rights transmission or contact and cross-border

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<sup>21</sup> See, for example, [https://unfccc.int/files/adaptation/application/pdf/4\\_synopsis\\_itkp.pdf](https://unfccc.int/files/adaptation/application/pdf/4_synopsis_itkp.pdf) (accessed on 26/10/2024) and [https://www.researchgate.net/publication/362432216\\_The\\_Role\\_of\\_Indigenous\\_Knowledge\\_and\\_Local\\_Knowledge\\_in\\_Understanding\\_and\\_Adapting\\_to\\_Climate\\_Change](https://www.researchgate.net/publication/362432216_The_Role_of_Indigenous_Knowledge_and_Local_Knowledge_in_Understanding_and_Adapting_to_Climate_Change) (accessed on 26/10/2024).



cooperation among IPs communities. These components are vital for pastoral and, especially, nomadic IPs.

## B. INTEGRATION WITH GCF SAFEGUARDING POLICIES

18. **Finding 3. GCF safeguarding policies are broadly aligned in intent towards IPs, but inconsistent terms and concepts can undermine how IPs are considered. The Policy is not fully integrated into the GCF's safeguarding policies, which may lead to inconsistent application.**
19. The GCF has provided for integrating IPs' rights, knowledge and participation into GCF activities through various policies, guidelines, and strategic documents. While the intent of GCF policies is driven towards the same broad purposes, a closer reading reveals critical differences.
20. Firstly, not all GCF policies mention IPs. The term IPs is mentioned in the context of the GCF's ESS, Gender Policy, Revised ESP, and Updated Strategic Plan. However, the term is sparingly used in the GCF's reporting and evaluation policies, such as the Integrated Results Management Framework (IRMF), Monitoring and Accountability Framework (MAF), and Evaluation Policy. This is also the case with policies related to GCF's fiduciary principles and standards, including the Initial Fiduciary Principles and Standards, the Policy on the Protection of Whistleblowers and Witnesses, and the Policy of Prohibited Practices. IPs are also not mentioned in the policies the GCF Secretariat applies at the project level, such as the Investment Framework and Interim Risk and Investment guidelines.
21. Secondly, some policies use broader terms like "vulnerable" and "disadvantaged". While the term "Indigenous Peoples" is mentioned in key environmental, social and gender-related policies, it is largely absent from operational frameworks for results and monitoring. The frequent use of broader terms like "vulnerable" and "disadvantaged" carries a distinct meaning to cover a wide range of people, such as those affected by age, family separation, or other local circumstances. While Indigenous communities may be vulnerable, they face vulnerabilities rooted in historical marginalization tied to their land and cultural rights. Further, in some cases, the GCF policies use the term "vulnerable" interchangeably to refer to IPs and vulnerable developing countries. Outside of the suite of ESS policies, the more commonly referred term is "disadvantaged" or "vulnerable". In these contexts, vulnerable is used to connote developing countries, which are more vulnerable to the impacts of climate change, and in certain occasions, vulnerable groups within the developing countries. In fact, most policies mention both vulnerable countries and vulnerable groups within those countries. This latter category may include IPs. However, that is not explicitly stated. Using other terms considered equivalent to IPs creates the risk of erasing IPs' distinct identity and needs, diluting their land, sovereignty, and cultural rights recognized by international law. This could also undermine specific protections and consultation mechanisms like the FPIC, which are essential to safeguarding their rights and status.
22. There are differences among the Policy, ESS and ESP regarding terms such as "meaningful consultations" and "disclosure requirements". While the Policy, ESS and ESP largely align in their commitment to meaningful consultation, there are subtle differences in emphasis. First, the Policy prioritizes meaningful consultation to inform project design and engagement through stakeholder feedback and environmental and social risk management. At the same time, the ESS emphasizes effective consultation regarding risk and impact identification. Second, the Policy advocates an ongoing and inclusive engagement throughout the project cycle, while the ESS limits the engagement to only directly affected communities, focusing on risk and impact. Third, the ESP

underscores the principle of meaningful consultation, reiterating the significance of cultural appropriateness and gender inclusivity, which are less emphasized in the Policy and ESS.

23. Additionally, there are discrepancies between the Policy, ESS and ESS in documentation and disclosure requirements. While the Policy mentions documentation and disclosure of the consultation process, ESS only speaks of documentation, and the ESP mandates public disclosure of key documents for a minimum 30-day period. Such divergence among policies applicable to the same key concepts can confuse those implementing them, such as AEs. It is also not clear from the text of these policies how the GCF wishes to reconcile any potential divergence in application, for instance, between meaningful consultation on the one hand and social risk management on the other.
24. Overall, there is a broad alignment between the Policy and ESP in their understanding of environmental and social assessment, with both emphasizing the assessment of environmental and social risks, impacts, and opportunities (Green Climate Fund, 2021a, para. 2(j); Decision B.19/11, Annex XI, para. 9(f)). However, the evaluation found that the current integration of the Policy within the ESP can potentially lead to inconsistent application of environmental and social safeguards across GCF projects. The GCF's ESS is anchored in the International Finance Corporation performance standards, including a dedicated standard for protecting IPs (Performance Standard 7). ESS is also referenced in the ESP as critical to the GCF-wide environmental and social management system. However, the Policy, which sets a higher standard on IPs than the GCF ESS (Performance Standard 7) (Independent Evaluation Unit, 2020a), lacks sufficient prominence in the ESP. The Policy is only briefly mentioned and solely in the context of stakeholder engagement, appearing near the end of the 25-page document. Given that the ESP is an overarching policy intended to explain "how GCF integrates environmental and social considerations into its decision-making and operations to effectively manage environmental and social risks and impacts and improve outcomes" (Green Climate Fund, 2021a, para. 1), the lack of an explicit reference to the Policy is inconsistent. The paragraph on "coherence and links with relevant policies and practices within GCF" also fails to directly address the Policy (Green Climate Fund, 2021a, para. 8(g)).
25. The critical difference between the ESP and the Policy lies in the language around implementation. While the former explicitly requires AEs to implement it, the Policy only expects AEs to meet its requirements. This distinction allows AEs to use their own standards on IPs as long as they meet the Policy's criteria, where necessary. In practice, this leads to "compliance assessments" by the GCF to ensure alignment, often resulting in delays during the project's technical review and appraisal stage. Additionally, the burden of these compliance assessments on the Secretariat increases the risk of the Policy being deprioritized in favour of weaker AE standards. This may open the door to potential inconsistencies, where the more robust safeguards of the Policy may be sidestepped in practice (Bertilsson and Soneryd, 2023).

## C. POTENTIAL OF THE INDIGENOUS PEOPLES ADVISORY GROUP

26. **Finding 4. The IPAG was established to advise and enhance dialogue among IPs-related stakeholders within the GCF ecosystem. While the IPAG is still establishing its institutional linkages and resources, its creation holds promise for implementing the Policy effectively.**
27. Paragraph 81 of the Policy provides for establishing the IPAG to enhance stakeholder coordination. IPAG's key functions comprise: (i) providing advice to the IPs' focal point at the Secretariat, National Designated Authorities (NDAs), and AEs or executing entities (EEs) on GCF-financed activities affecting IPs, (ii) reviewing the implementation and monitoring of the Policy, particularly on the appropriate modality to enhance dialogue among IPs, the GCF, states, AEs and EEs, and

other key experts, and (iii) providing guidance and advice to the GCF Board when requested.

Following its establishment, the IPAG has conducted several meetings since 2022. It consists of four IPs representatives and four alternates from regions within developing countries where the GCF may fund activities. The group has autonomy in selecting its members and developing the terms of reference governing its activities and functions. Following its establishment, the IPAG has been invited to review several strategic documents and funding proposals (FPs) during the appraisal process. The IPAG has also supported the IPs Specialist at the GCF in developing an internal review of IPs-relevant projects to assess evidence of IPs best practices. It has also established early institutional linkages with the LCIPP FWG.

28. The IPAG has yet to fully cement its position within the GCF to ensure effective functioning. At the institutional level, the IPAG is still establishing formal and institutional linkages with various parts of the GCF. For instance, IPAG responds to advisory requests, but the links with AEs and NDAs are not established systematically and occur only when specific opportunities arise. Similarly, it has interacted with various areas within the Secretariat, as described in its report submitted at B.40. However, there are currently limited mechanisms for ensuring the Secretariat's uptake, implementation and accountability regarding IPAG advice. At the Board level, IPs concerns are generally expected to be represented through the Civil Society Organization Active Observers, as the IPAG or IPs lack alternative institutional processes to provide representative advice or consultation to the Board. Indeed, the extent to which the perspectives of civil society organizations (CSOs) and IPs influence the approval of projects at the Board remains debatable. Bertilsson and Soneryd (2023) found a neglect of CSOs' views and the IPs Policy during the process of project approval.
29. Consequently, the IPAG has very limited influence over project design and decision-making during the FP process and is perceived as only an advisory body with restricted strategic vision and minimal capacity to ensure its recommendations are implemented. Several GCF interviewees were uncertain about IPAG's roles and responsibilities, thus indicating its establishment has not yet contributed to the capacities at the GCF. One interviewee noted, "IPAG should be more than a feel-good, nice space or a vent for GCF to say they have a policy and an advisory group on IPs".
30. With limited time and resources, the IPAG is reasonably expected to prioritize its advisory and oversight functions while focusing less on FPs relevant to IPs. Still, the Group's efforts show promise in supporting the uptake and implementation of the Policy. IPAG activities and reports reflect a commitment to promoting the Policy among AEs and NDAs and championing IPs-led climate action. It has already established cross-institutional linkages with the LCIPP FWG as noted during COP27. Also, the group benefits from a high degree of legitimacy and institutional buy-in from the Secretariat.



## Chapter 3. GCF PROJECTS WITH IPS

### A. ACCESS TO THE GCF

31. **Finding 5. As outlined in its policies and strategies, the GCF's overall approach towards IPs focuses on two key areas: (i) preventing harm through safeguards, and (ii) promoting information sharing, participation and consultation. While commendable, this approach lacks a clearly defined commitment to providing IPs with specific access to resources or benefits.**

32. The objective of the Policy is to

provide a structure for ensuring that activities of GCF are developed and implemented in such a that fosters full respect, promotion, and safeguard of indigenous peoples so that they (a) benefit from GCF activities and projects in a culturally appropriate manner; and (b) do not suffer harm or adverse effects from the design and implementation of GCF-financed activities.

This is largely consistent with the GI (para. 71), which provides for mechanisms to promote the input and participation of stakeholders, including IPs.

33. Based on interviews and reviewed literature, there is a general expectation for GCF resources to be accessed by developing countries and their communities. For example, UNDRIP article 39 refers to providing financial and technical assistance to IPs. However, the Policy positioning towards the IPs has limited focus on access to resources. A relatively weak commitment in the Guiding Principles of the Policy states: “Facilitate access to GCF resources for indigenous peoples. GCF will encourage national designated authorities and accredited entities to engage with and be inclusive of indigenous peoples. GCF may consider taking actions to better meet the needs and priorities of indigenous peoples to support their initiatives and efforts for climate change mitigation and adaptation actions”. Section 8.9 of the Policy also addresses resource allocation, suggesting that the GCF “will give consideration” to IPs needs and priorities and “may target funds” if necessary to correct “climate change exacerbated indigenous peoples’ inequalities”. These provisions, while welcome, do not amount to an unequivocal commitment by the GCF to ensure access to its resources.

34. Other than the commitments to use traditional knowledge, the GCF Strategic Plan 2024-2027 makes only a few references to IPs. It includes modest commitments to access or benefit sharing, and IPs are regarded as agents of change rather than beneficiaries:

- Paragraph 8: Integrating local communities, IPs, women and girls and people with disabilities as agents of change.
- Section 4.2(g): Pursue collaborative stakeholder engagement, such as ideation challenges and dedicated forums.
- Section 4.3(f): Significantly expand the deployment of the enhanced direct access modality and other devolved financing approaches to enable more rapid access to finance for locally led adaptation action, engaging affected communities, civil society and IPs in delivering to meet the needs of last-mile beneficiaries.

35. The subsequent action plan (GCF/B.38/Inf.15) focuses on enhancing “inclusive innovation based on traditional, local and Indigenous Knowledge and practices; including with advice from IPAG” but

does not mention benefits and access to finance. In other words, the GCF documents do not include a specific project portfolio allocation nor qualitative indicators of the support to be provided. To summarize, the GCF's approach to IPs focuses on two specific dimensions: (i) information-sharing and consultation, and (ii) harm prevention. While these dimensions are worthy and required as a minimum for the GCF, the Fund lacks a specific mandate or provision to provide access. Consequently, this approach results in limited access to resources for IPs or IPOs, as outlined below.

36. **Finding 6. GCF projects are expected to focus on national-level or country priorities. Its NDA-centred and accreditation-based model presents a systematic challenge to IPs accessing GCF resources directly.**
37. In accordance with the GI's emphasis on country-driven approaches, projects are expected to align with national priorities. While it is anticipated that the Board would review the GCF's approach to country ownership as a tangible and measurable quality, the principle does not guarantee that GCF projects support IPs' priorities. Two dimensions merit consideration in aligning with the priorities of IPs.
38. First, the GCF model depends on NDAs and national governments, whose specific priorities and capacities may always align with IPs. While NDAs are primarily engaged at the beginning of the project cycle, their influence diminishes as the project progresses. Evidence from the evaluation's country case studies corroborates this. For example, in one case study, governmental entities representing the legal rights of IPs could not access project documentation before it was submitted to the NDA, limiting their capacity to assess the project's compliance with national policies, protocols for FPIC and the rights of IPs. Another case study uncovered stakeholder concerns over the NDA's limited capacity to intervene in projects where the government is neither the AE nor the EE, particularly regarding risks to IPs involved in REDD+<sup>22</sup> projects. Apart from the ability and capacity of NDAs, there may also be systematic barriers involving Nationally Determined Contributions (NDCs). NDCs are regarded as key documents that guide the GCF's investments climate action strategies. NDCs also find primary emphasis in GCF strategies. However, an IEU review of the NDCs in countries implementing projects focused on IPs reveals that less than half of the reviewed NDCs mention them. This figure is consistent with the academic literature that finds that only a quarter of NDCs – 137 NDCs as of January 2018 – included language related to IP or traditional knowledge. In other words, IPs have limited agency in the State-focused narrative of NDCs.
39. The second dimension is related to access to GCF resources, for which important evidence is available from various IEU evaluations, including those on direct access and accreditation. To enhance IPs' access, it may be worth considering the role of IPOs. IPOs can provide the trust, history, patience, legitimacy and cultural alignment necessary to engage with Indigenous communities. IPOs frequently serve as conduits for development assistance to reach IPs. However, the GCF access model is dependent on accreditation and AEs.<sup>23</sup> This model presents numerous challenges.
40. Firstly, international accredited entities (IAEs) and direct access entities (DAEs) find accreditation challenging. Accreditation to the GCF would be unfeasible for most IPOs, as they typically lack the

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<sup>22</sup> REDD stands for “reducing emissions from deforestation and forest degradation” in developing countries. The “+” stands for additional forest-related activities that protect the climate, namely sustainable management of forests and the conservation and enhancement of forest carbon stocks.

<sup>23</sup> Independent Evaluation Unit (2024c) finds that the discussion on access has come to focus on AEs instead of countries. The synthesis recommends the GCF remedy this focus in its strategies.

financial management capacities of IAEs or even DAEs. Further, accreditation itself does not guarantee access to GCF projects.

41. Secondly, several interviewees from AEs and external GCF partners reported they often have limited capacity to engage IPs, posing challenges for meaningful Indigenous participation. This perception was corroborated by other interviews, which indicated that frequently on IPs-related matters, the GCF comes to expand its second-level due diligence to resemble first-level checks. This is due to some AEs, particularly in the private sector, lacking capacity to implement IPs-relevant projects based on the submitted FPs.
42. Thirdly, interviewees from AEs, NDAs and the GCF generally agreed that consideration for IPs often emerges late in the project cycle, leading to a rushed and inadequate consideration of their rights and interests.<sup>24</sup>
43. These three factors often lead to uncertainty in engaging with IPs regarding project origination. According to reporting conducted at the funding proposal stage, engagement with IPs is rudimentary. Only 9.3 per cent – 12 of the 128 IPs-relevant projects<sup>25</sup> – mention including IPs during the co-creation process of FPs, and this arrangement is typically limited to the national level rather than extending to communities and local groups.
44. This is not to say that FPs are misaligned with the interests of IPs. Case studies (a sample skewed towards the positive) indicate a general appreciation of GCF projects by IPs. However, experts among IPs and IAEs concede that IPs-focused projects with complex, challenging, or new contexts are at a disadvantage when originating with the GCF. Indeed, at a strategic level, the GCF focuses on scale, speed, and country or national ownership. While the GCF's effectiveness in these areas is yet to be measured, many findings in this chapter demonstrate that the orientation of GCF's business model and processes differs from the needs of IPs. Programming with the IPs may require trusted partnerships, time and patience for meaningful engagement, and smaller but longer term, concessional resources – an approach somewhat at odds with the compliance-based model, expected speed, and scale of the GCF. A key interviewee summarized the distance between the GCF and IPs in the following terms: "For access to GCF resources, IPs are forced to look for friends, who have their own interests in the first place."
45. **Finding 7. External evidence suggests that supporting IPs can cost-effectively and sustainably achieve mitigation and adaptation results. Yet, the GCF is the only major multilateral climate fund without a specific mechanism or commitment to support IPs.**
46. The academic literature has recognized the relationship between IPs, natural resources, poverty, and climate vulnerability over the last two decades. At the fundamental level, it is well acknowledged that IPs' territories are often home to significant concentrations of resources, including biodiversity, minerals, and forests, which are crucial for combating climate change (Garnett and others, 2018; Intergovernmental Panel on Climate Change, 2023; Food and Agriculture Organization of the United Nations, 2021). However, these areas often coincide with socioeconomic marginalization, limited political representation, and an acute vulnerability to climate impacts. Effective climate action is further compounded by long-standing restrictions on resource access and exclusion from decision-making (Sobrevila, 2008; Reyes-García and Benyei, 2019; Hughes, 2018).
47. The scientific literature also points towards solutions. Studies increasingly show that IPs-led stewardship, grounded in traditional ecological knowledge and sustainable land-use practices, is crucial for effective conservation. Research by Dawson and others (2024) and Walker and others

<sup>24</sup> This evaluation report does not take full account of the restructuring of the GCF Secretariat, which was underway during data collection and analysis.

<sup>25</sup> Source: Country ownership dataset, IEU review of stakeholder engagement variable, as of B.40.

(2020) highlights that conservation is more effective when IPs are provided appropriate governance roles, backed by legal recognition and community-led models, and aligned with multilateral frameworks like the Kunming-Montreal Global Biodiversity Framework (Convention on Biological Diversity, 2022). Evidence suggests mitigation and adaptation outcomes are better when IPs independently manage conservation areas. For example, deforestation rates in Indigenous territories within the Amazon are up to 50 times lower than in privately owned or unregulated lands (Bowman and Minas, 2019; Intergovernmental Panel on Climate Change, 2023).

48. Additionally, the strong social capital within Indigenous communities – marked by shared values, trust, history and cohesion – supports conservation efforts by fostering collaboration, reducing conflicts, and promoting sustainable practices that strengthen ecosystem resilience (Rastogi, Thapliyal and Hickey, 2014). Studies also show that these social bonds encourage adherence to conservation measures (Pretty and Ward, 2001; Bodin and Crona, 2009). Incontrovertible evidence shows that local and traditional knowledge further bolsters communities' adaptive capacities, equipping IPs to respond effectively to environmental changes and challenges (Agrawal, 2005; Berkes, 2009). These elements of social capital and ecological insight enhance IPs' ability to manage resources sustainably, delivering resilience benefits that span both local and global scales (Garnett and others, 2018; Anisimov and Magnan, 2023). The international discourse on biodiversity has undoubtedly advanced, particularly with the landmark decision at the Convention on Biological Diversity (COP 16) to establish a permanent subsidiary body on the knowledge of IPs and local communities.
49. Most multilateral climate funds have specific windows or programmes to support IPs. For instance, the GEF Small Grants Programme provides financial and technical support to CSOs and community-based organizations, focusing on IPs and others. The programme design allows it to monitor IPs beneficiaries and overall implementation. Similarly, the Dedicated Grant Mechanism within the Climate Investments Funds is designed to empower IPs and local communities to sustainably manage their natural resources by giving them direct access and self-determination in financing. According to a 2024 midterm evaluation (Indufor North America and ICF, 2024), the mechanism accounts for 8 per cent of all worldwide finance disbursed directly to IPs on forest management and tenure. Elsewhere, the Adaptation Fund has recently approved a funding window for locally led adaptation projects that address structural inequalities faced by IPs, among other aspects. In summary, the GCF is the only multilateral climate fund without a specific or dedicated means to enable access to IPs.

## B. IPS-RELATED PROJECTS

50. **Finding 8. The precise number of IPs beneficiaries cannot be determined, nor can the finance directed towards them be estimated. The evaluation team estimates 128 GCF projects include activities relevant to IPs.**
51. As the GCF does not specifically seek to provide access to the IPs, there is limited institutional data across the portfolio. As GCF projects are not specifically classified or the beneficiaries specifically tracked, it is impossible to determine the number of IPs beneficiaries, nor the level of finance directed towards them.
52. To overcome this limitation, the evaluation team identified relevant projects using the following criteria to identify projects: activities and budgets outlined in FPs, the Secretariat's tagging system, implementation of FPIC, the presence of an Indigenous Peoples Plan (IPP) or Indigenous Peoples Planning Framework (IPPF), and funded activity agreements (FAAs) related to IPs. It also



considered the Indigenous Peoples Tracker on GCF Projects, an initiative of Tebtebba and Elatia.<sup>26</sup> More details on the methodology are available in the volume II of this report.

53. As of B.40, the evaluation team identified 121 FPs and seven SAPs where the Policy is highly relevant. Only 34 IPs-relevant projects were identified to have activity-level budgets, comprising USD 593.01 million in GCF financing and USD 302.98 million in co-financing, amounting to a total of USD 914.86 million. Superficially, the regional distribution of the IPs-related portfolio resembles the rest of the GCF portfolio in terms of access modalities and result areas.
54. Of the portfolio of 178 projects reviewed by this evaluation, approximately 36 per cent focuses on two results areas: (i) forestry and land-use, with a disbursement of USD 1.65 billion, and (ii) most vulnerable people and communities, with a disbursement of USD 1.74 billion. Fifty-eight per cent of projects use grants as the primary instrument. In addition, the evaluation reviewed 50 FPs and SAP that had some relevance to the Policy due to their attempt to integrate IPs knowledge.
55. A closer and qualitative review of 128 IPs-relevant projects found that GCF projects supporting IPs reflect diverse themes, ranging from ecosystem restoration in Senegal to water management in the Maldives. Examples include the following:
  - FP226 “Resilient Puna: Ecosystem based Adaptation for sustainable High Andean communities and ecosystems in Peru” aims to identify, implement, and manage ecosystem-based adaptation priorities, enhancing the ownership and resources of Indigenous Andean and local communities to bolster their resilience to climate change.
  - FP048 “Low Emissions and Climate Resilient Agriculture Risk Sharing Facility” in Guatemala and Mexico aims to promote the efficient use of firewood in Indigenous and rural communities of Guatemala.
  - FP089 “Upscaling climate resilience measures in the dry corridor agroecosystems of El Salvador” strengthens local planning, governance, and coordination to support adaptation and restoration efforts for Indigenous communities in El Salvador.
56. The evaluation team identified seven SAP projects as very relevant to the Policy. In addition, it considered 19 SAP projects somewhat relevant to the Policy because they try to integrate IPs knowledge. A detailed review of SAP projects is provided in a finding below.
57. **Finding 9. IAEs manage a larger proportion of the GCF’s IPs-relevant projects. Most of these projects are either medium or small in size and present category B level of environmental or social risk.**
58. Of the 128 projects, a larger proportion is implemented by IAEs, accounting for 32 projects (52 per cent), followed by national entities with 13 (30 per cent) and regional entities with 8 (18 per cent). Since IAEs tend to be accredited for larger projects in financial terms, IAEs implement the more significant part of the portfolio. Regarding the type of access modalities, the larger share of AEs managing IPs core projects are IAEs with 23 (52 per cent), and DAEs managing 21 (48 per cent). The top 10 entities with the highest number of IPs-relevant projects are all IAE. Six manage 48 per cent. The top four entities in terms of FP numbers are the United Nations Development Programme (UNDP), the Food and Agriculture Organization of the United Nations (FAO), the United Nations Environment Programme, and the Deutsche Gesellschaft für Internationale Zusammenarbeit, with 28 per cent of the IPs-relevant portfolio (28, 22, 8, and 8 FPs, respectively). This can be viewed positively, as these agencies and others, such as the International Fund for Agricultural Development, are widely regarded for collaborating with IPs in development projects. Interestingly,

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<sup>26</sup> See <https://iptracker.tebtebba.org/index.php>.

funding for other entities, such as those outside the United Nations, has increased exponentially over the last four years.

59. In terms of financing, the picture shifts slightly, with the Asian Development Bank and the World Bank having the larger financial share. Among EEs working with AEs, 15 are related to IPOs or have experience with IPs. Only one is an IPO, the National Indigenous Organization of Colombia (ONIC), the Indigenous national forum on climate change. These figures are IEU estimates based on a review of the EE list in the Portfolio Performance Management System (PPMS), APRs, and interviews conducted for country case studies.
60. The majority of GCF funds for the 128 IPs-relevant projects has been approved for public sector entities: 107 projects representing 84 per cent of the portfolio and USD 6.1 billion. In contrast, only 21 projects, accounting for 16 per cent, have been allocated to private-sector entities, totalling USD 1.56 billion.
61. An AE size and risk category define the types of projects it can implement. For IPs, the risk categorization is especially important, as category A projects tend to have the most significant environmental and social impacts – such as large infrastructure projects – which could affect Indigenous lands and livelihoods. Most of the 128 IPs-relevant FPs and SAP applications are either medium in size, numbering 55 (43 per cent) or small, numbering 39 (30 per cent). Projects in categories B and C, with moderate to minimal environmental and social risks, also require careful management to ensure Indigenous rights are respected. Most of the 128 IPs-relevant projects are category B, with USD 4.39 billion (47 per cent) of GCF funding committed for that category of projects.
62. **Finding 10. The GCF's approach to IPs is perceived primarily as a compliance exercise rather than an opportunity to harness the contribution of IPs in implementing climate actions and achieving meaningful results. The Policy's compliance-driven approach disincentivizes AEs from developing meaningful projects involving IPs, potentially leading to their exclusion from GCF projects.**
63. From the perspective of AEs, GCF's ESS requirements and the Policy are perceived as mere "tick-box exercises". The requirements for these two policies are addressed separately during the review and monitoring processes, both from compliance and results perspectives. This separation creates lengthy and duplicative processes, fostering the perception that the process is mostly procedural and disconnected – such as compliance appearing unrelated to results – ultimately reducing it to a mere formality. Thus, while foundational standards are not followed, AEs and NDAs view operational standards as compliance hurdles hindering their efforts to develop project proposals. This makes it unlikely that standards and principles will be genuinely upheld during project origination, implementation and monitoring.
64. External stakeholders echoed these concerns, describing GCF as overly compliance-focused during implementation. The implementation often focuses on a "do-no-harm" approach rather than active and meaningful involvement of IPs. Some interviewees noted that GCF's compliance-based approach hinders practical implementation. One interviewee claimed they spend only 30 per cent of their time on implementation work and up to 70 per cent on producing reports and documentation to fulfil the GCF's compliance requirements. Some AEs feel the GCF lacks trust and confidence in their abilities despite their proven track record and years of effective work with IPs. On the other hand, the GCF may feel that some IAEs are inconsistent in delivering quality ESS and assessments of IPs despite their strong track records, particularly when the capacity of the country office of the IAE may be a limiting factor.

65. Interviews with the Secretariat revealed significant variations in staff understanding of the Policy. A segment of the GCF staff viewed the Policy as “too prescriptive and rigid”, while others felt the Policy was “too broad and open for multiple interpretations”. Those with a more generalist approach perceived the Policy as very prescriptive and found its apparent procedural nature challenging. One respondent stated: “The Policy floats somewhere; it loses implementation context”. Respondents with more experience engaging with IPs emphasized the need to build internal capacities to overcome some limitations.
66. Even AEs with a broad range of expertise may view projects involving IPs as presenting an additional financial and technical burden due to the GCF’s extensive requirements. Some interviewees acknowledged a perverse incentive to programming with IPs. The GCF does not prioritize or privilege programming with IPs, although the Policy allows it. The disincentive to programme with IPs is not unique to the GCF, and interview data suggests that AEs can circumvent such disincentives by limiting the ambitions and scope of project activities or by programming only opportunistically.
67. **Finding 11. The design of alternative access modalities like SAP and Project-specific Assessment Approach (PSAA) and technical assistance modalities like the Project Preparation Facility (PPF) do not sufficiently integrate IPs considerations or specifically support IPs-relevant projects.**
68. The SAP may be perceived as highly relevant to IPs, given the smaller scale of projects. For instance, IPAG has formally recognized the “key role that the SAP may have in enhancing the implementation of the IPP [IPs Policy] through supporting the leadership role of IPs in tackling climate change”.<sup>27</sup> While the SAP seem theoretically relevant to IPs, a closer examination of its design reveals its limited links with IPs. Two Board decisions guide the design of SAP (B.18/06 and B.32/05), identifying criteria and indicative activities but do not specifically signify IPs or other communities as a strategic focus. Indeed, the B.18 pilot scheme identifies activities that affect IPs as among the risk factors that require due diligence and consultations, making them eligible for the SAP pilot scheme. The proportion of IPs-relevant projects in the SAP portfolio is lower than in the overall portfolio. This evaluation identified seven SAP projects for which the Policy is very relevant, accounting for USD 82 million in GCF financing and USD 18.71 million in co-financing. In addition, the team found 19 SAP projects where the Policy is relevant because they focus on traditional knowledge. While this limited use of SAP may appear counter-intuitive, it is explained by the design of SAP described above. Further, GCF interviewees observe that, in practice, SAP projects tend to avoid focusing on IPs, particularly if any risks are uncovered that may trigger safeguards under the Policy and an upgrade from category C<sup>28</sup> to category B. This challenge is also compounded by the lack of tailored guidance. While the SAP Review Toolkit provides general advice on appraisal and stakeholder engagement, it does not offer specific guidance on engaging with IPs.
69. The GCF’s PSAA is being piloted, with the first project approved at B.40. In theory, the focus on project-specific needs can make PSAA a conduit for entities working on IPs-relevant projects to access the GCF. By design, PSAA considers proposals only with low to medium environmental and social risks and impacts – categories C/I-3 and B/I-2 – and does not include specific strategic focus areas. While a full assessment of the PSAA is not possible during its formative stage, the evaluation’s interviewees highlight potential risks for IPs. For category C projects, an entity may

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<sup>27</sup> GCF/B.40/Inf.13/Add.03.

<sup>28</sup> One of the SAP project eligibility criteria is to have environmental and social risks and impacts classified as minimal to none.

have limited obligations for safeguarding. During PSAA, the GCF assesses the entity's ability to meet GCF standards and addresses gaps. However, this assessment is undertaken before approval. Interviewees outside the GCF expressed concern that if IPs risks emerge after approval, alignment with ESS or the Policy may be circumvented, possibly resulting in IPs not receiving consistent safeguards. In other words, the application of unforeseen risks may be subject to the capacity and inclination of the entity. Thus, the balance between speed and flexibility still needs to be fully optimized.

70. PPF is a demand-driven GCF instrument that provides financial and technical assistance to AEs. It especially focuses on funding and supporting DAEs in preparing FPs. Eligible activities under the PPF are IPP, Community Development Plans, and stakeholder engagement consultations, including assisting with FPIC where required by the ESS and the Policy (Green Climate Fund, 2020). AE's use of PPF is increasing in number and value over time. However, only 46 of 100 PPF activities mentioned IPs, of which 39 PPF activities have components related to stakeholder engagement and consultation. Yet only 12 of 100 PPF activities provide clear evidence in the project document of being used for FPIC-related purposes. Positively, around 61 per cent (61 out of 100 total) of the funded activities under the PPF are directed towards stakeholder engagement, gender action plans, and gender studies at the same time. Further, out of 100 PPF activities, 22 advanced to the stage of developing an FP that considers involving IPs.
71. **Finding 12. Readiness and Preparatory Support Programme (RPSP) can be a crucial and effective modality for integrating IPs' considerations into GCF programming. Yet, the use of RPSP has been opportunistic.**
72. Paragraph 73 of the Policy encourages NDAs and AEs to seek readiness funding to support Indigenous communities in several meaningful ways. This support includes supporting the development priorities of Indigenous communities through community-driven programmes, preparing participatory profiles of Indigenous communities to document their cultural practices, social organization, and resource-use patterns; and facilitating partnerships among governments, IPOs, CSOs, and the private sector to promote the climate resiliency of IPs' communities. Paragraph 96 of the Policy further commits the RPSP and FPs to support "at a minimum, activities related to consultation, advocacy, institutional building for project implementation and management, as well as the effective engagement of Indigenous Peoples in the formulation of project proposals and monitoring and evaluation."
73. However, desk review evidence suggests that the use of RPSP is opportunistic rather than systematic. The evaluation team reviewed the readiness grants based on two of the erstwhile readiness results framework's<sup>29</sup> five key objectives<sup>30</sup> considered most relevant to IPs: objective 1 and objective 3. Of 798 readiness grants since 2015, 303 have contributed to objectives 1 and 3, respectively, NDA strengthening and developing National Adaptation Plans. Out of these 166 grants<sup>31</sup> (20 per cent of the total) were identified as having partially supported activities relevant to

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<sup>29</sup> The new Readiness Strategy does not yet have a revised Readiness Results Management Framework in place.

<sup>30</sup> Objective 1: Capacity building for climate finance coordination. Countries established human, technical and institutional capacity to drive low-emission and climate resilient development, including through direct access to the GCF.

Objective 2: Strategies for climate finance implementation.

Objective 3: NAP and/or adaptation planning processes. National adaptation plan (NAP) and/or other adaptation planning processes formulated to catalyse public and private adaptation finance at scale.

Objective 4: Paradigm-shifting pipeline development.

Objective 5: Knowledge sharing and learning (cross-cutting).

<sup>31</sup> IPs relevant grants were selected if IPs were mentioned in the grant documents at the activity level. Full methodology for RPSP grant selection is provided in volume II.

IPs, with USD 355.02 million allocated and USD 288.43 million disbursed.<sup>32</sup> Of the 166 identified grants, 108 RPSP initiatives submitted completion reports. Only 22 of these reports mentioned IPs, representing 20 per cent of completion reports and 13 per cent of the grants. The most cited activity was capacity-building at 30 per cent, followed by consultations and institutional building. Among these 22 reports, outputs relevant to IPs receiving support included: engagement strategies and implementation receiving seven readiness grants, with communication receiving six and ESS compliance four. This underuse of RPSP is corroborated by other evidence, such as an IEU survey for its 2023 RPSP evaluation, which found only 23 per cent of the stakeholders strongly agreed it effectively advanced the inclusion of IPs (Independent Evaluation Unit, 2023d).

74. While the RPSP's engagement with IPs has been limited, it has made several effective contributions. Interviewees noted that some RPSP grants have resulted in improved consultation with IPs and greater Indigenous representation in project planning, as evidenced in a number of case studies. In Colombia, an RPSP Adaptation Planning grant (COL-RS-003) promoted structured consultations and participatory frameworks that actively engaged Indigenous leaders in climate finance decision-making. RPSP support has helped integrate Indigenous ecological knowledge into national climate policies, strengthening collaboration between Indigenous communities and government institutions. The RPSP's "Strengthening capabilities of Indigenous Peoples on climate finance in Colombia" (COL-RS-007), led by Fondo Acción, promoted local governance and integrated Indigenous communities' perspectives into climate finance decision-making. Table 3–1 outlines how the RPSP initiative in Colombia strengthened IPs dialogue, improved participatory frameworks, and helped integrate traditional knowledge into national climate strategies.
75. In Vanuatu, readiness grants have strengthened NDA capacity and stakeholder engagement, but challenges persist in raising awareness on effectively using readiness funds for community involvement. Stakeholders from AEs, NDAs and EEs called for more precise guidelines on navigating readiness process to enhance collaboration and project outcomes, especially for the new readiness strategy announced in 2023, which has yet to be adequately promoted or implemented.
76. Some barriers to effectively using the RPSP for IPs include a lack of guidance, unclear delineation of roles for delivery partners (DPs) supporting IPs-related grants, and lack of monitoring. The Policy and Operational Guidelines do not specify DPs as one of the parties responsible for implementing the Policy. Further, in the new readiness strategy, DPs are to be identified through a competitive process, which risks overlooking IPs. As one interviewee said, "If it weren't for GCF requirements, IPs would not be there."

**Table 3–1. RPSP's contributions to building the capacity of IPs in Colombia to manage climate finance**

Promoting structured consultations:	The project organized workshops and dialogues with Indigenous leaders, providing a platform for them to voice their climate priorities and challenges.
Designing and enhancing participatory frameworks:	These frameworks ensured IPs were active participants in decision-making, not merely consulted, by formalizing their role in project design and implementation.
Incorporating traditional knowledge into national policies:	Local governance was strengthened by embedding Indigenous ecological knowledge into national climate policies, ensuring their traditional practices were respected and applied in climate adaptation strategies.

Source: Data analysed by IEU DataLab from the documents of grant COL-RS-007.

<sup>32</sup> The financing figures are estimates, as some grants only partially contribute to IPs activities, and the exact portion related to IPs activities could not be determined.



## Chapter 4. IMPLEMENTATION OF IPS PROJECTS

### A. INTEGRATING TRADITIONAL KNOWLEDGE

77. **Finding 13. The Policy and other strategy and policy decisions by the Board encourage integrating traditional knowledge into projects and GCF-financed activities where suitable. However, this evaluation finds that applying this knowledge depends on the time and resources available to AEs. When utilized, this knowledge enhances project relevance and sustainability.**
78. The Policy explicitly respects and values IPs' cultural heritage, local and traditional and the Indigenous ways of ownership and knowledge transmission. It further promotes the participation and leadership of traditional knowledge holders in GCF-financed activities (annex XI to decision B.19/11). More recently, the Board confirmed that:

*[T]he use of best available information and data, including from the Intergovernmental Panel on Climate Change, and from traditional, local and indigenous knowledge and practices is sufficient to form the basis for the demonstration of impact potential for GCF-supported activities, while taking into account the context of the proposal, the different capabilities of accredited entities, and country and regional circumstances. (Decision B.33/12, para. h)*

Therefore, local and traditional knowledge should be incorporated into project proposals, particularly to demonstrate impact potential and climate rationale, as well as within the ensuing project.

79. Emerging evidence highlights the use of local and traditional knowledge for climate rationale in proposals addressing particularly vulnerable contexts. The IEU's evaluation of the investment framework identified instances of using traditional knowledge for climate rationale, among projects in particularly vulnerable contexts (Independent Evaluation Unit, 2024a). Similarly, the evaluation found that for 2023–2024, eight FPs included traditional knowledge<sup>33</sup> in the climate rationale section. However, it is important to note that this evidence is emerging and remains to be consolidated.
80. At the second-level, there have been modest GCF-level efforts to use local and traditional knowledge in programming. For instance, IPAG's 2023 workplan included activities to support cross-divisional discussions on various forms of knowledge, including local and traditional knowledge and practices, primarily through meetings with the GCF staff. The *Strategic Plan for the GCF 2024–2027: Implementation Action Plan* mentions exploring, enhancing, and continuing inclusive innovation based on local and traditional knowledge and practices. While the Policy includes important provisions for traditional knowledge, the GCF approach remains unclear regarding the rights, status, sustainability, integration and curation of traditional knowledge systems and the reconciliation and integration of IPs' knowledge with scientific knowledge.
81. The AEs and NDAs interviewed agreed that consulting with Indigenous communities can provide valuable insights regarding local ecosystems and cultural practices. However, for meaningful and

<sup>33</sup> It is important to note that distinguishing traditional knowledge from Indigenous traditional knowledge proved challenging, so the term here is used broadly.

effective consultation to occur, several key conditions must be met. AEs developing proposals with IPs need a history of deep, trust-based, and close relationships with the Indigenous communities involved. Further, the development of such proposals would require rarely available time and resources. Yet, these conditions are not always met, resulting in mixed outcomes.

82. The evaluation found that projects that proactively engage with IPs and Indigenous institutions from the beginning have reported significant benefits in areas like natural resource management and disaster preparedness. For example, integrating traditional knowledge in Colombia has enhanced forest management, biodiversity conservation, and more informed national climate policies. The REDD+ results-based payments project, FP134 “Colombia REDD+ results-based payments for results period 2015-2016”, aims to boost Indigenous participation in climate mitigation activities by applying traditional knowledge to preserve forest ecosystems. This project supports the governance capacities of Indigenous communities in the Amazon, empowering them to manage their territories sustainably. Additionally, as outlined in Table 3–1, the RPSP grant on “Strengthening Capabilities of Indigenous Peoples on Climate Finance in Colombia” (COL-RS-007) has reinforced local governance by embedding Indigenous ecological knowledge into national climate policies. This approach ensures that Indigenous practices are respected and incorporated into climate adaptation strategies, promoting a more holistic integration of Indigenous methods within national efforts to combat climate change.
83. In Paraguay, integrating traditional knowledge into project activities, such as sustainable land management and agroforestry, has supported mitigation and adaptation outcomes while revitalizing cultural practices at risk of being lost. For instance, FP062 “Poverty, Reforestation, Energy and Climate Change Project” in Paraguay leveraged traditional forest management methods and the cultivation of native plant species, strengthening the community’s cultural heritage and reinforcing the value of traditional knowledge. This approach has been particularly impactful for younger generations, helping to preserve and pass down these practices.
84. In Vanuatu, integrating traditional knowledge is highly relevant, given that around 98 per cent of the population identifies as Indigenous<sup>34</sup>. GCF-funded projects have made progress in recognizing this knowledge, particularly in water security and disaster resilience efforts. For example, in the FP191 “Enhancing Adaptation and Community Resilience by Improving Water Security” in Vanuatu, Water Committees played a crucial role in integrating traditional and technical knowledge for water management. In 2023, FP035 “Climate Information Services for Resilient Development Planning in Vanuatu” produced the “Traditional knowledge climate and weather indicator booklet” in collaboration with the Department of Meteorology and Geo-Hazards and the Ministry of Climate Change. This booklet compiles Vanuatu's traditional climate and weather indicators to educate people on using traditional knowledge for early warning actions. It aligns with the project’s traditional knowledge strategy, which guides the core principles for implementing traditional knowledge within the project. In its second phase, the project aims to integrate the traditional knowledge strategy into a regional network of traditional knowledge sites, sharing Vanuatu's practices and lessons across the region.
85. Conversely, there are cases where Indigenous traditional knowledge is treated as supplementary to western scientific methods rather than central to the project’s activities. In such cases, interviewees expressed concern that traditional knowledge was not deeply embedded in project design. For instance, in Paraguay, some interviewees stated that their traditional agricultural practices were inadequately respected or integrated into GCF-promoted models, leading to diminished trust and disengagement. However, in the Philippines, it was demonstrated that embracing Indigenous

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<sup>34</sup> About 98 per cent of the population is Melanesian, specifically the Indigenous Ni-Vanuatu people.



practices and rituals and engaging with Indigenous experts is crucial to aligning the project with the customs and worldviews of IPs, despite the challenges outside agencies and investors face in fully appreciating these unique and valuable perceptions.

86. **Finding 14. As the GCF lacks portfolio-level commitments focusing on IPs, its monitoring and results measurement systems do not track or monitor specific IPs-related indicators, making it impossible to assess Fund-wide results regarding IPs.**
87. The IRMF sets out the GCF's approach to assessing how its investments deliver climate results and how its results contribute to the GCF's overall objectives. This framework includes the levels at which results will be collected and assessed and defines the roles and responsibilities for measuring and reporting results. The current indicators are measured in a tiered approach and at different levels of impact.
88. Given that the GCF's approach to IPs is one of consultation and "do-no-harm", the IRMF and other frameworks do not include indicators that assess how GCF investments affect and address the needs of IPs, including the integration of traditional knowledge. The AEs have no defined role or responsibility for reporting the results and indicators related to IPs.
89. At the project level, AEs can include indicators and tools to assess how IPs are affected and contribute to results. To assess this, the evaluation team reviewed monitoring and evaluation plans in 81 FPs from IPs-related projects to identify the inclusion of IPs in theories of change, indicators, targets and assessment plans. The team found that IPs-specific indicators were present in only eight plans (9 per cent) as part of project result frameworks, monitoring plans or other feedback mechanisms. There was no inclusion of IPs in the projects' theories of change, implying an absence of pathways and linkages between IPs and overall project goals.
90. The evaluation also revealed that some AEs face challenges regarding the costs and expertise required for collecting disaggregated data and implementing methods to track IPs results at the project level. The IRMF and APRs do not require project implementers to measure or track the use of traditional knowledge. Further, a review of the projects' monitoring log frames found little evidence of outcomes, outputs, indicators, and targets related to Indigenous traditional knowledge.
91. For example, FP001 "Building the Resilience of Wetlands in the Province of Datem del Marañón" in Peru emphasizes IPs but offers only a limited set of outcome and output indicators for measuring its impact on IPs, such as the number of Indigenous beneficiaries and environmental management plans formulated for Indigenous territories. More recent projects include indicators for IPs and Indigenous women, but these primarily measure outputs, not outcomes.
92. Project-level evaluation reports are similarly limited, as the GCF Evaluation Policy does not include any specific subcriteria on IPs, though the evaluation standards of the GCF<sup>35</sup> include a provision on IPs. Out of the 38 interim evaluation reports reviewed for this evaluation, issues regarding IPs were assessed only in 10 reports. External stakeholders interviewed also reinforced this finding, noting that Indigenous voices are often sidelined in project evaluations.
93. Despite the lack of portfolio-level commitments, frameworks and indicators for tracking IPs' needs, examples of good practice exist, as detailed in Table 4–1.

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<sup>35</sup> GCF Evaluation Standards 8 *Human Rights, Gender Equality and Environmental Considerations* states that the universally recognized values and principles of human rights and rights of IPs need to be integrated into all stages of an evaluation. The Standard also recognizes that evaluations should take an approach that is sensitive to the needs and special conditions of IPs. For more details, see GCF Evaluation Standards at <https://ieu.greenclimate.fund/sites/default/files/document/220428-gcf-evaluation-standards.pdf>.

**Table 4–1. Examples of good practices for IPs engagement**

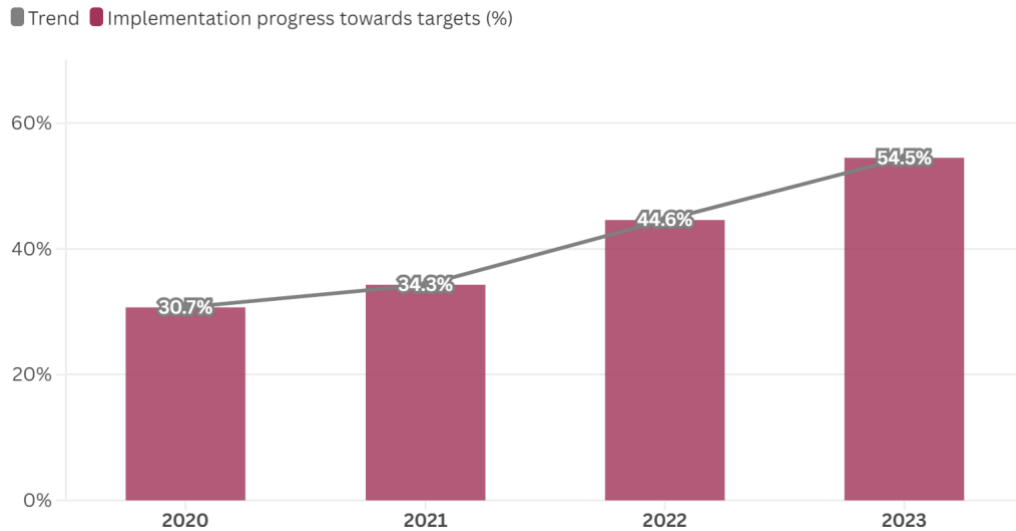
Project	Example of good practice
FP101 “Resilient Rural Belize (Be-Resilient)”	Provides disaggregated data by age and sex to monitor the targeting strategy and outreach to vulnerable groups, including IPs.
FP145 “RELIVE - REsilient LIVELihoods of vulnerable smallholder farmers in the Mayan landscapes and the Dry Corridor of Guatemala”	Monitors differential impacts by sex, age, and vulnerability, particularly concerning IPs.
FP187 “Ouémé Basin Climate-Resilience Initiative (OCRI) Belin”	Applies a monitoring system that articulates the work and action plans for IPs, ensuring IPs are included in the monitoring process.
FP201 “Adapting Philippine Agriculture to Climate Change (APA)”	Monitors the inclusion of IPs in planning and decision-making processes, ensuring their needs are considered during project implementation.

Source: Desk review by the evaluation team

## B. REPORTED RESULTS FOR IPs

94. **Finding 15. While a portfolio-level assessment of results is not feasible, some emerging outcomes are visible in individual projects. The evaluation finds that IPs project-level outcomes correlate with national contexts and power dynamics among actors. The outcomes can be affected by the level of meaningful participation of IPs in project decision-making processes and benefit-sharing mechanisms.**
95. Most projects visited as part of the country case studies have yet to deliver significant benefits for IPs. Only nine of 128 IPs-relevant projects specified the number of IPs designated as project beneficiaries, totalling an estimated 803,208. As illustrated in Figure 4–1, from a sample of 13 fully disbursed and one completed project, the average implementation rate of all activities, including those relevant to IPs, is 54.5 per cent, as indicated by their APRs. Further, IPs-focused activities appear limited within the overall scope of GCF projects. Data from FPs for the 128 very relevant IPs projects show that only 62 projects (48 per cent) forecast results for activities targeting IPs.
96. Additionally, only 34 projects (27 per cent) have a budget for IPs activities, eight projects (6 per cent) have a specific budget line for IPs, and nine projects (7 per cent) have a specific budget line for IPs’ participation in the project management committee or project coordination unit. Only five projects (4 per cent) have IPs in their theory of change. Considering that many project activities are relatively limited, with a large proportion still pending, it will need some time before their outcomes can be measured.

**Figure 4–1. Progress of 14 IPs-relevant projects fully disbursed or completed as of 2023**



Source: APRs 2020–2023, calculated by IEU DataLab

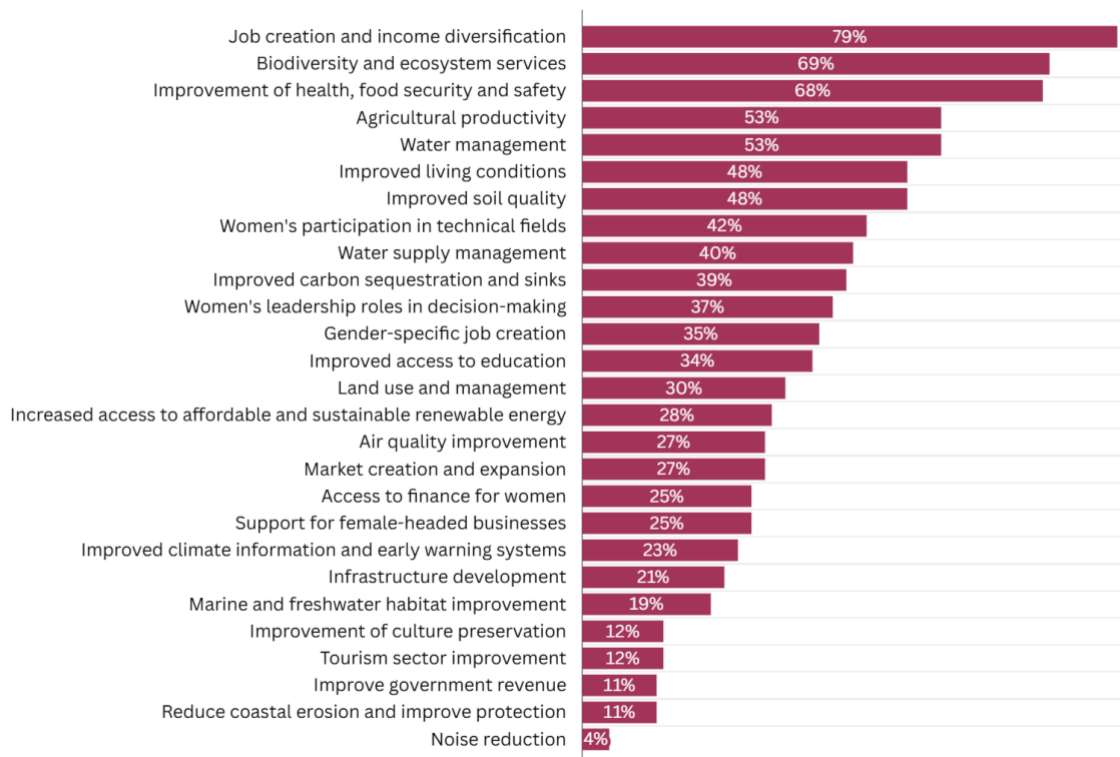
Methodology: Averages of the project’s progress on activities versus targets, reported by 14 projects in APRs 2022–2023.

97. Country case studies and desk reviews of documents reveal a range of outcomes, including economic benefits from sustainable agriculture and forestry (FP134 in Colombia), improved livelihoods through bio-business benefits for 73 Indigenous communities (FP001 in Peru), and equitable benefit sharing for IPs in hydropower projects (Solomon Islands country case study) (Independent Evaluation Unit, 2023a).
98. Project results and outcomes depend on the design of GCF-funded activities and various exogenous and pre-existing factors, some of which are covered in more detail in the following chapter. First, consultation and genuine involvement of IPs in projects are critical to ensuring benefits are aligned with the needs of IPs. This also includes more comprehensive collaboration between IPs with local and national governments. The extent to which IPs engage with and benefit from climate finance depends on local government structures, provincial legal frameworks and budget allocations, as seen in the case studies for the Philippines, Colombia and Paraguay. Other factors involve power dynamics in decision-making processes for project activities and benefit sharing. For example, as demonstrated in the Botswana case study, stakeholders can feel constrained by unequal power relations between and across community-level stakeholders, as the decision to focus on agriculture did not align with the livelihood preferences of the IPs. IPOs in Botswana also stated that the employment opportunities emerging from the GCF project were quickly limited to a select few, sidelining local capacities, including those of IPs, and resulting in elite capture. In other situations, the lack of official tracking of IPs in government statistics leads to their exclusion from project benefits and resource distribution, as seen in the Colombia country case study. Operationally, culturally appropriate benefits require a longer time to implement. For example, as illustrated in the Paraguay country case regarding FP062, realizing the project’s economic benefits took longer as more work was required to adapt its activities to align with local cultural practices and needs. Overall evidence from the country case studies indicates that only some of these factors are accounted for or directly addressed by GCF projects.

### C. CO-BENEFITS

99. **Finding 16. The GCF's monitoring framework<sup>36</sup> does not mandate tracking or reporting co-benefits specifically related to IPs, resulting in the GCF missing the opportunity to assess and understand the broader impacts of its funded projects on IPs. The scope of co-benefit remains limited during the design, approval, and monitoring phases.**
100. According to the GCF Appraisal Guidance, co-benefits for IPs can be reported under the category of social co-benefits in the FP template. Here, the AEs can add co-benefits that answer questions “Does the proposed project or programme deliver net positive impacts for IPs or enhance the conservation of or access to cultural heritage compared to a scenario without the project?” Some FPs report this co-benefit, and the IEU finds that one co-benefit – improvement of culture presentation – ranks fifth from the bottom of all social co-benefits identified by the AEs. Figure 4–2 provides a detailed list of the co-benefits available to IPs from GCF projects.

*Figure 4–2. Share of projects contributing to co-benefits by type of co-benefits of 128 IPs-relevant projects*



Source: Sustainable Development Potential data set developed by IEU DataLab as of B40 (31 October 2024)

Note: The categories were developed for the purpose of this analysis by the evaluation team.

Methodology: The figure represents the percentage distribution of co-benefits across IPs-relevant projects. The percentages were calculated by dividing the IPs-relevant project (128) with co-benefits, then multiplying by 100.

101. After approval and during the implementation phase, IRMF’s guidance note<sup>37</sup> groups data on co-benefits into six categories in the FP template: (i) environmental, (ii) social, (iii) economic, (iv)

<sup>36</sup> IRMF.

<sup>37</sup> The guidance note supports the completion of the IRMF elements of the revised funding proposal template for PAP and SAP.

gender, (v) adaptation, and (vi) mitigation co-benefits.<sup>38</sup> Since the IRMF came into force only recently in 2021, available APRs provide limited data on co-benefits.

102. At the project level, AEs are encouraged to document co-benefits, allowing them the flexibility to include and monitor indicators specific to IPs. A review of project-level indicators<sup>39</sup> in the monitoring and evaluation plans revealed that only 13 per cent (6 of 81) reported project-level co-benefits, and only three of these were somewhat related to IPs:
  - FP100 “REDD-PLUS results-based payments for results achieved by Brazil in the Amazon biome in 2014 and 2015” reports co-benefits for IPs such as enhanced community engagement and empowerment.
  - FP143 “Planting Climate Resilience in Rural Communities of the Northeast (PCRP)” covers participatory mapping and planning exercises in Brazil, including conflict mediation and resolution over resource use, which can be considered co-benefits for Indigenous communities.
  - FP230 “Kuali Fund-GCF” in seven countries in Latin America and the Caribbean region focuses on inclusivity as a co-benefit for the Indigenous communities.
103. In addition to project-level indicators, AEs can report co-benefits narratively through APRs, separate from log frames, or assess them in interim and final evaluations. However, a review of APRs and interim evaluations found minimal information and results concerning co-benefits for IPs. The evaluation team (also concurred by GCF staff in interviews) found that information on co-benefits is loosely presented and poorly documented by the AEs. From the perspective of AEs, collecting data for co-benefits indicators is costly and requires adequate monitoring plans and tools. The current results and monitoring frameworks (IRMF) and the accountability framework (MAF) do not require AEs to report co-benefit indicators on IPs. Also, guidance on how to use the available reporting opportunities and templates on co-benefits is limited. Interviewed IPs experts noted an evolving global discourse on tracking co-benefits for IPs, which increasingly acknowledges them as active agents of change rather than passive recipients of climate action. Several interviewees emphasized the need for the GCF to reconsider and revamp how Indigenous co-benefits are incorporated into its monitoring systems to reflect this paradigm shift better.
104. **Finding 17. Despite the general alignment of GCF policies on gender, Indigenous women are not systematically targeted by IPs-relevant projects. The participation of Indigenous women is limited to capacity-building efforts, not amounting to proactive empowerment. The case studies offer a glimpse of diverse activities targeting Indigenous women.**
105. The GCF’s Gender Policy emphasizes equal opportunities for men and women in stakeholder consultations during project preparation, implementation, and evaluation. It encourages NDAs and focal points to uphold principles of inclusion, equality, and non-discrimination in stakeholder consultations (Green Climate Fund, 2019a, para. 20). Furthermore, both the Policy and paragraph 22 of the Gender Policy mandate that AEs conduct consultations that are not only gender sensitive but also culturally aware.
106. Gender considerations are also embedded in the GCF’s ESS and addressed explicitly in the context of the Policy. One of the objectives of the Policy is to pay particular attention to the different challenges faced by women and girls and other groups within Indigenous communities and to promote the participation and leadership of women in GCF activities, given their role as traditional knowledge holders and custodians of cultural and spiritual heritage and values (paragraph 10(e)).

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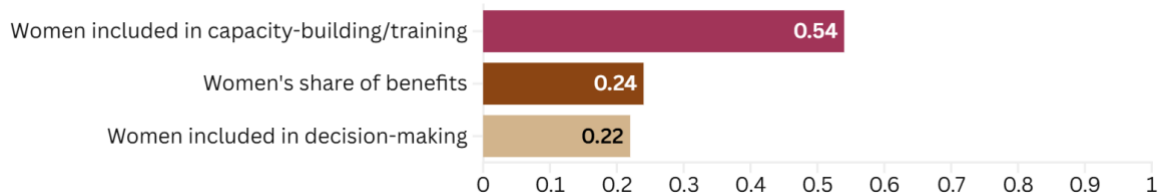
<sup>38</sup> If any co-benefits are identified in sections B.2(a) and D.3 of the PAP FP template (D2 and D3 of the SAP FP template), AEs are encouraged to add and monitor co-benefit indicators under the project or programme co-benefit indicators.

<sup>39</sup> This refers to the population of 128 IPs-related projects, of which 81 had complete monitoring and evaluation plans.

Further, the Policy requires that meaningful consultations tailored to IPs be both gender and inter-generationally inclusive and culturally appropriate (paragraph 51). An emphasis is placed on involving IPs representative bodies and organizations, including Indigenous women and youth, in consultations (paragraph 52(a)).

107. A review of the Gender Action Plan (GAP) activities of the 128 IPs-related projects found that discussion on women in the GAPs was available in 83 projects (66 per cent). This figure suggests that women are not explicitly targeted across the portfolio despite the projects' considerable contributions to IPs. Further analysis of GAPs that targeted women found that most activities involving women focused on capacity-building and training, at 54 per cent. In comparison, only 22 per cent were involved in decision-making processes. It should be noted that these numbers reflect the entire scope of the project and are not limited only to Indigenous women.

**Figure 4-3. Gender Action Plan scoring of activities for 83 IPs-relevant projects**



Source: APR 2022–2023

Methodology: The scores were calculated based on reports from 83 of 128 projects that provided data on the APR indicator, 4.2 GAP progress. Projects were grouped by the number of activities reported under three categories: (i) women's share of benefits, (ii) women included in decision-making, and (iii) women included in capacity-building or training. The counts for each category were obtained by performing a keyword search on the reported paragraphs to check for mentions of relevant terms. These counts were then normalized by dividing them by the total number of reported activities within each theme, resulting in proportional scores to allow for category comparison, and then a score from 0 to 1 was applied to the results.

108. Interview data and country case studies found that GCF projects address gender in diverse ways. Some case studies corroborated lower participation and contribution to decision-making. Traditional gender roles within some Indigenous communities still limit women's participation in public decision-making processes, as seen in the Paraguay case study. Even when invited to participate, Indigenous women and their contributions are sometimes undervalued or overshadowed by their male counterparts, reflecting persistent gender biases. Resources allocated for supporting women's participation are often inadequate, limiting the long-term impact and sustainability of gender-focused activities.
109. On the other hand, many case studies found positive examples. In the Vanuatu case study, Indigenous women were involved in decision-making in FP191 "Enhancing Adaptation and Community Resilience by Improving Water Security in Vanuatu". This involvement included participation in the project's Water Committees, where women helped manage local water resources and promote climate adaptation strategies. In another Vanuatu project, FP184 "Vanuatu community-based climate resilience project", women's participation was critical in disaster preparedness and food security activities. Women participated actively in local committees, providing valuable knowledge on traditional food preservation techniques to be incorporated into adaptation measures to alleviate the impact of climate-related disasters. However, a recurring challenge for women was the lack of compensation for their time spent participating in project activities and insufficient support for domestic responsibilities and childcare – issues the project did not address.

110. Similarly, the Colombia case study, FP056 “Scaling up climate resilient water management practices for vulnerable communities in La Mojana”, prioritized Indigenous women in its capacity-building initiatives. The project trained more than 19,970 people in restoration activities, including many Indigenous women recognized for their role in ecosystem restoration. Moreover, the project helped create water boards, some of which were led by women, ensuring their participation in local water governance. Another important project, FP203 “Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals”, HECO incorporated gender equity into its planning by strengthening women's roles in climate-resilient land-use practices and ecosystem conservation, directly benefiting Indigenous women in rural areas.
111. Projects like FP121 “REDD+ Results-based payments in Paraguay for the period 2015-2017” and FP062 in Paraguay provide examples of successful gender inclusion, particularly in promoting Indigenous women's leadership and participation. FP062, for instance, created an Indigenous Women Leaders Network and a Rural Women Leaders Network to enhance female participation through leadership training and exchange programmes. In this project, women participants were trained in market access and income-generation activities, highlighting a focus on economic empowerment for Indigenous women. Furthermore, staff members from governance institutions were trained on gender issues, and a protocol was developed to prevent and address institutional and land-related violence against women. Similarly, FP121 in Paraguay has included Indigenous women in decision-making processes. Specific efforts were made during the initial consultations to ensure that Indigenous women were involved in shaping the project's design, particularly around sustainable land management and agroforestry initiatives. Gender parity was also promoted in decision-making bodies, such as regional and national councils, ensuring that men and women were represented.
112. Likewise, the Philippines case study found that women were sought during the FPIC process, and the project required transparency on project design elements, including gender considerations. For FP201 in the Philippines, the Philippines Commission for Women was fully involved – during national inception, as a Board member, in a technical working group, a project steering committee and a Project Management Unit. The Commission also supports the Department of Finance in harmonizing gender and development guidelines, especially gender sensitivity within projects.
113. In the Botswana case study, gender considerations have been addressed, but with some limitations, particularly regarding the engagement of Indigenous women. According to the findings from FP158 “Ecosystem-Based Adaptation and Mitigation in Botswana's Communal Rangelands Project”, the GAP aligns with national climate priorities and aims to include vulnerable female farmers affected by climate change. However, the plan does not explicitly address the unique challenges Indigenous women face or consider gender ramifications in key climate-dependent livelihood practices such as veld product utilization, which is highly relevant to Indigenous women in Botswana's rural areas. Moreover, the project noted concerns around labour conditions, including sexual harassment risks due to the country's predominantly male-dominated pastoral sector. To mitigate these risks, the GAP recommends training and sensitizing stakeholders, particularly concerning sexual harassment and gender-based violence, alongside including prohibitions in codes of ethics. This recommendation reflects an effort to protect Indigenous women, although the broader cultural context and specific needs of Indigenous women could have been further explored.

## D. GRIEVANCE REDRESS ARCHITECTURE

114. **Finding 18. The GCF provides an architecture for grievance redress, accessible to IPs through three channels: at the project level, at AE level, and by approaching the GCF Independent Redress Mechanism (IRM). IPs face general issues in accessing redress using the GCF's architecture.**
115. AEs are responsible for establishing project-level grievance redress mechanisms (GRM) that align with the Policy. AE and the EE are also expected to have a functional GRM system at the entity level. Further, the IRM is accessible to IPs alongside the GRM at the project level and the entity level. The evaluation finds that the means of redress designed by most organizations face some challenges addressing (i) the power imbalance between IPs and their counterpart AEs and CSOs, (ii) the lack of awareness of or inability to access the GRMs, (iii) logistical issues, including a lack of access to telephone lines and the internet, and (iv) literacy, language and cultural barriers. These challenges also apply to accessing the IRM. Interviewees added that these challenges are more significant for IPs in remote areas. These challenges limit the ability of IPs to seek recourse when their rights are violated, resulting in issues remaining unresolved and potentially harming Indigenous communities.
116. The evaluation team also reviewed the GRMs outlined in IPPs, Environmental and Social Management Plans and Stakeholder Engagement Plans. Although the established GRMs comply with the Policy, APRs do not provide the GCF with effective grievance monitoring. This shortfall is attributed less to the Policy and more to broader challenges, such as the unsuitability of APRs for providing effective, timely monitoring of Policy compliance and the accuracy of AEs' self-reported information. Interview respondents acknowledge that sensitivities around disclosing complaints that might reflect negatively on a project can lead to underreporting of issues. Overall, it is difficult to determine whether the GRM cases reported include every dispute and complaint in GCF projects.
117. Many Indigenous communities typically have their own traditional systems to address grievances and complaints. The Policy Operational Guidelines states "These [grievance] mechanisms are intended to be designed in consultations with the affected or potentially affected indigenous peoples, with the intention to handle complaints locally and efficiently, and with a focus on accessibility for affected communities" (Decision B.19/11, Annex XI, para. 66; Green Climate Fund, 2019b, section 3.4). As a respondent in a case study stated, "The IPs have their structures, which includes their mechanism on building peace and addressing grievances through their elders of councils or IPs structures." However, evidence from case studies suggests that some projects have suffered from insufficient time and resources. For instance, in FP121 in Paraguay, detailed consultations led to a generally satisfactory GRM. However, there is a perception that the process was rushed and inadequately documented, leaving some members feeling alienated. In FP056 in Colombia, the incorporation of the IPs' own conflict resolution mechanism was not effectively used at an early stage to address internal conflicts within Indigenous communities over land ownership and resource management.
118. At the same time, GRMs at the project level are expected to respect culture and local structures, enabling grievances to be submitted in the appropriate Indigenous language, through oral communication, or anonymously if necessary (Decision B.19/11, Annex XI, paragraph 67; Green Climate Fund, 2019b, para. 23). In FP035 in Vanuatu, the evaluation team observed the application of this guidance through local traditions. For example, villagers would display a leaf at the village entrance to demonstrate disagreement or complaint. The project team remained alert to community-level signs and kept track of unofficial grievances. This approach was important for appropriately



collecting complaints within communities and ensuring early resolutions. However, it reflects the GCF's challenge in balancing prescriptive and universally applied processes with customary practices. Another critical point from this case is the lack of documentation. While the AE respected the local traditions and allowed for a customary resolution process that was culturally appropriate as suggested in the Policy, the evaluation found limited documentation. It is conceivable that detailed documentation could formalize the processes, but paradoxically would limit flexibility.

119. **Finding 19. There is mixed evidence on the effectiveness of GRMs at the project level. In some cases, the GCF's IRM has addressed grievances, including those related to project closure. An important lesson from the IRM's experience is the importance of an exit strategy for projects, which GCF does not have.**
120. A review of the APRs focusing on 128 IPs-relevant projects found that, in total, 217 grievance cases, including IPs and other cases, were reported by these projects from 2020 to 2023, with an average of 2.5 cases per year per project. Of these, 46 projects submitted IPs-related grievance cases, half of which are still open. As found in reports of projects-level AE-led evaluations, 13 reported on GRMs in place, but only seven GRMs were functional and effective. Inconsistencies are apparent in the procedures followed by AEs or EEs when receiving a complaint.
121. The evaluation of FP072 "Strengthening climate resilience of agricultural livelihoods in Agro-Ecological Regions I and II" in Zambia found that the project did not have a register for complaints and was missing documented grievance files in districts where disputes were evident. The final evaluation of FP017 "Climate action and solar energy development programme in the Tarpacá Region in Chile" reported a grievance case where communities spoke directly to the EE. In this case, the EE did not provide a formal response as the grievance was not officially submitted through the GRM. Other key issues with non-functional GRMs included limited evaluation due to COVID-19 restrictions, lack of adequate tools for information collection and follow-up, unresolved complaints, and a lack of awareness among staff and stakeholders of the GRM's existence and procedures.
122. The Policy and its Operational Guidelines aim to resolve issues at the lowest level, through negotiation or mediation, before escalation to higher authorities (Green Climate Fund, 2019b, para. 84). The evaluation team found that across several projects, communities expressed frustration that grievances were not being addressed in a timely manner at the project level. Some communities often waited for resolutions on critical issues, such as infrastructure promises or conflicts over land ownership, without receiving updates from the AEs. While assessing the validity or veracity of the grievance is beyond the scope of this evaluation, there are indications of a disconnect between the expectations of IPs regarding the speed and modalities of the process and the approach undertaken by the AEs. GRM delays can be seen as detrimental to IPs' trust, project results and safeguards.
123. For example, FP069 "Enhancing adaptive capacities of coastal communities, especially women, to cope with climate change induced salinity" in Bangladesh reported significant delays in resolving grievances related to the selection of climate-resilient livelihood beneficiaries submitted through the GRM in 2021. Resolution of these issues took 12-18 months, leading to the cancellation of climate-resilient livelihood training and the failure to meet the target of reaching 19,069 women beneficiaries. In the words of one IPO, "Grievances are raised, but they are often not dealt with quickly or effectively, which leaves Indigenous communities vulnerable."
124. An aggrieved party can also approach the IRM, which can self-initiate complaints under certain conditions. There are examples where the IRM has initiated cases on matters relating to the infringement of IPs rights in GCF-funded projects. For instance, with FP001 in Peru, the IRM used credible third-party information to determine that communities faced considerable barriers to

accessing the GRM. The case was closed only after the completion of remedial measures. In accordance with the Policy, IRM takes notes of grievance logs drafted by the AEs via the APRs. However, the reporting of grievances is tied to the APR reporting cycle and its approval process, which can be prolonged due to the GCF's review procedures and the time it takes for AEs to respond.

125. Within the same context, an IPs-related case in Nicaragua provides an important lesson for the GCF. In 2023, the GCF terminated FP146 "Bio-CLIMA: Integrated climate action to reduce deforestation and strengthen resilience in BOSAWÁS and Rio San Juan Biospheres" in Nicaragua. Although this case involved IPs, the termination of the project highlighted that the GCF currently lacks a predetermined approach for responsibly exiting Board-approved projects. In the absence of such an approach, the GCF is unable to put in place formal mechanisms to monitor subsequent impacts, some of which may be adverse for IPs. While an assessment of the GCF's exit from this case is beyond the scope of the evaluation, the case highlights that in the absence of exit strategies, the GCF cannot monitor or address pending grievances or unresolved issues, creating potential risks for IPs or other communities. Although this evidence was drawn from an IPs-related project, the implications are relevant to broader GCF.

## Chapter 5. FACTORS AFFECTING THE GCF'S APPROACH TO IPS

### A. INFLUENCE OF NATIONAL CONTEXT ON THE POLICY

126. **Finding 20. While the Policy's application is broad in scope, its implementation is rooted in and subject to national context, where the GCF does not play a proactive role. Consequently, the Policy's implementation is highly variable and falls outside the GCF's direct sphere of influence.**
127. As per paragraphs 14 and 15, the Policy applies commonly accepted criteria for identifying IPs and respects self-identification as Indigenous or tribal as a fundamental criterion for determining the application. However, other provisions of the Policy elicit state laws and regulations (paragraph 28) and collaboration with the host government to assess impact (paragraph 37). Paragraph 33 further holds AEs responsible for compliance with all applicable laws, including the legal frameworks of the state(s) in which the activities are located and the obligations of the state(s) under relevant international treaties and agreements. Therefore, the application is variable and subject to the context.
128. The Policy is put into operation in diverse contexts, where the level of recognition for the IPs may vary significantly. For instance, in Colombia, on the one hand, IPs were granted the authority to protect, manage and conserve biodiversity within their territories according to their knowledge, per government Decree 1275.<sup>40</sup> On the other hand, Botswana does not recognize any specific groups as Indigenous to the country, maintaining that all the country's citizens are Indigenous. In many Pacific nations, Indigenous identity is closely linked to national identity, making the application of the Policy more straightforward. However, effective implementation requires contextual adaptation and a tailored approach that considers unique local context and reality. Therefore, the Policy is applied in highly diverse contexts with varied insights and challenges, as described below.
129. The Policy acknowledges that self-identification as Indigenous is the basis for the Policy application, allowing the Policy to be inherently adaptable even in contexts with a diversity of formal recognition of IPs. The Operational Guidelines stresses that Indigenous status is not contingent on the state's formal recognition but is based on characteristics such as collective attachment to territories, distinct languages or dialects, and unique cultural practices. This flexibility is crucial in contexts where IPs are not formally recognized because the Policy can still be applied effectively by focusing on communities that self-identify as distinct. In addition, the Policy allows the use of alternative terms where the consideration of Indigenous status may be politically or legally sensitive.
130. However, notwithstanding the flexibility built into the Policy, the evaluation team observed differing interpretations of the Policy provisions in all the countries it visited. Many stakeholders interviewed, such as AEs, NDAs, local authorities and IPOs, found the Policy overly prescriptive. Others were concerned that key elements of the IPs' human rights architecture and FPIC were missing from the Policy, even when the Policy was addressing those points. This diversity of

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<sup>40</sup> Decree 1275 of 2024 on "Establishing the standards required for the operation of indigenous territories in environmental matters and the development of the environmental competencies of indigenous authorities and their effective coordination with other authorities and/or entities."

interpretations is sustained through the project lifecycle and is exemplified by case studies and interview data.

131. The evaluation team came across contexts where FPIC legislation is more stringent than the Policy, and communities perceived the GCF FPIC process as weaker than expected. For instance, in Colombia, where Indigenous rights are protected under the national constitution and related laws, the evaluation team found a misalignment between the Policy's expectations regarding FPIC and those held at the national, regional, and community levels. This misalignment disconnected GCF projects from the evolving needs of the communities, leading to project delays and disagreements among community members and the entities involved, including AEs, EEs, and the NDA.
132. Discrepancies with national protocols were also found in Paraguay, where interviewees noted that the FPIC process was guided not by the Policy and the Operational Guidelines but by governmental and communitarian consultation protocols per national Decree 1039.<sup>41</sup> Similarly, in the Philippines, national legislation allows Indigenous communities to withhold consent and reject proposals. By contrast, the Policy states that FPIC does not require unanimity and may be achieved even when individuals and groups explicitly disagree (paragraph 54). A consensus from the interviews was that AEs implementing FPIC in such contexts did not have sufficient information or capacity to apply national policies or legislation that take precedence over the Policy.
133. On the other hand, there are examples from contexts where national legislation neither explicitly recognizes IPs nor sets standards for FPIC. A few interviewees recalled situations where NDAs could not provide no-objection letters because they deemed the project document inconsistent with national legislation, even though the AE ensured they aligned with the Policy. In a specific example from FP158 in Botswana, the NDA was unable to approve the IPs plan due to the use of the term "Indigenous" in the document's title and was unaware that alternative terms prescribed in the Policy could have been applied.
134. The evaluation team found that in cases where national contexts do not recognize IPs, AEs use alternative terms in project documents, such as remote, rural and vulnerable communities. Further, paragraph 72 of the Policy allows AEs to support activities that may, among other things, strengthen local legislation to recognize customary or traditional land tenure arrangements. However, this evaluation did not encounter specific GCF activities that sought to support local legislation. Since the GCF generally adopts a relatively passive role in project origination and does not proactively seek projects – except in cases like RFPs – nor aim to influence national legislation, project implementation is subject primarily to the national context.

## B. ENSURING FREE, PRIOR AND INFORMED CONSENT

135. **Finding 21. The Policy frames the use of FPIC as a generally well-intentioned iterative process. In practice, however, FPIC is limited by scope of its application, timing in project origination (which can view FPIC as a one-off event rather than a continuous process), and the availability of resources to support the good faith negotiations expected by the GCF.**
136. The Policy and its Operational Guidelines frame FPIC as an iterative process requiring consent (Decision B.19/11, Annex XI, section 7.2; Green Climate Fund, 2019b, section 3.3), building on meaningful consultation, and involving good faith negotiations between AEs and IPs (Green Climate Fund, 2019b, para. 47). These negotiations involve, among other things, willingness to

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<sup>41</sup> Decree No. 1039/18 on the "Protocol for a process of free, prior and informed consultation and consent of Indigenous Peoples in Paraguay" (2019).

“change initial position, modify offers where possible, and provide sufficient time for decision-making” (ibid.). The GCF further expects this to be done when constructive solutions are still possible and alternative options can be considered (ibid., para. 67). These provisions are well regarded for their intent, ensuring that affected persons are consulted and can express their concerns. However, this benevolent intent is underdone by other provisions of the Policy and, in practice, by the FPIC scope, timing, and availability of resources.

137. **Scope of FPIC.** Outside the GCF, the right to withhold consent can function as a veto and is internationally recognized (UNDRIP, article 32). The Policy falls short of recognizing the full potential of FPIC as a mechanism for self-determination, as will be explained further. The possibility that FPIC could lead to outright rejection, or a veto of projects is not expressly articulated in the Policy or its Operational Guidelines. In fact, paragraph 47 of the Operational Guidelines recognizes FPIC as a process that builds upon the requirements for “meaningful consultation (which include requirements for free, prior and informed consultation and participation)” and does not refer to consent.
138. Moreover, the Policy states that FPIC “does not require unanimity” (paragraph 54). As a result, there is ambiguity between consultation and giving consent, which becomes apparent in practice. According to the evaluation’s case studies, several AEs across divergent geographies have regarded consultations as a substitute for consent. Exceptions are found in some cases, such as in the Philippines, where the Indigenous Peoples Rights Act (1997) and its guidelines set a high standard and specify a clear process for obtaining consent beyond consultations. However, in the GCF, the ambiguity between consultation and consent is highlighted by a statement from the CSO Active Observers who “cautioned that this action [consultation efforts] did not equate to obtaining free, prior and informed consent (FPIC) from the peoples that would be affected by the project”.<sup>42</sup>
139. **Timing of FPIC.** The Operational Guidelines highlights that consent is given for specific activities, impacts and mitigation measures, and this agreement is valid for the project’s duration. Exceptions occur in cases of fundamental changes in the project (Green Climate Fund, 2019b, para. 56) where a new FPIC would be mandated. However, as evidenced by case studies, this formulation is often misinterpreted to mean that FPIC is a static one-off event, not a dynamic and recurring process needing continuous consent and community engagement. This misinterpretation could potentially undermine the involvement of IPs in ongoing decision-making processes throughout the project cycle, replacing it with consultations conducted only before the start of a project. Finally, interview respondents outlined the lack of clarity on what qualifies as “fundamental changes” that can create room for misunderstandings about when a new FPIC process is triggered.
140. Further, the Policy and Operational Guidelines state that meaningful consultations with IPs should begin early and inform the project design and implementation (Decision B.19/11, Annex XI, section 7.1.1.5). However, the Operational Guidelines acknowledges that it may not always be possible to define every aspect of the activity, pinpoint locations, or identify affected communities (including IPs) and that in the “absence of these elements, achieving FPIC prior to approving a project may not be feasible or considered meaningful because the determination should be closely related to the defined impacts of a known project on Indigenous Peoples” (Green Climate Fund, 2019b, para. 51). This flexibility, while trying to allow practicality for real-world situations, significantly weakens the critical “prior” element of FPIC.
141. Although the guidelines express that AEs are expected to conduct another FPIC when more details are available, it often happens after the GCF has already approved projects and substantial investments have been made. The case studies have demonstrated that this delay severely restricts

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<sup>42</sup> GCF/B.38/16

the ability of IPs to stop or alter the course of projects, as the timing for the FPIC occurs too late in the process for meaningful changes. As CSO Active Observers reminded at B.39, FPIC should be “implemented as a meaningful and iterative process, not only after approval of a project by the Board or when implementation sites or subprojects were determined but starting at the planning and design stage and throughout the implementation of an intervention.”<sup>43</sup>

142. **Resources.** The Policy and the Operational Guidelines outline the necessary resources for obtaining FPIC (Green Climate Fund, 2019b, paras. 67–69), including sufficient time, human resources and material resources. The Operational Guidelines further emphasizes that IPs often need adequate resources to build their capacity to undertake robust project evaluations. While this is a positive acknowledgement, project-level evidence and interviews indicate that, in practice, little investment is made in ensuring that FPIC is conducted meaningfully. Instead, the process is often reduced to a tick-box exercise. In some cases, especially where IPs and IPOs are well-organized, there can be substantial albeit underutilized capacity within the community to act as interlocutors and advocates, which can facilitate FPIC. The presence of underused capacity was demonstrated in the Philippines country case study.
143. AEs and IPOs have argued that a lack of human and material resources is a major barrier (Colombia country case study), as they are expected to obtain FPIC before project approval, meaning no funds are allocated to resource the FPIC process.<sup>44</sup> AEs also point out that there is no guarantee that a project will be approved, thereby introducing financial uncertainty into their capacity to invest in a comprehensive FPIC process, as evident in case studies from the Philippines and Colombia. Previous IEU evaluations and interviews have noted that AEs perceive GCF project preparation costs as relatively high, with the unpredictable costs of FPIC often regarded as a burden.

## C. FPIC AND EMPOWERING INDIGENOUS PEOPLES

144. **Finding 22. The evaluation finds mixed evidence on using FPIC to empower IPs to actively shape or reject GCF projects. However, in cases where IPs are able to shape the consent process meaningfully, it leads to sustainable project outcomes.**
145. Apart from the time and resources, FPIC requires a qualitative dimension, which includes mutual trust, good faith, and an intent on the part of the AEs to engage with IPs. Flemmer (2022) refers to an “implementation paradox”, which results from the gap between the formal recognition of rights, such as IPs rights to FPIC, and weak implementation of rights. During the implementation paradox, consultation processes risk becoming bureaucratic formalities used to legitimize state or other exogenous interests rather than genuinely considering or incorporating IPs' perspectives into the projects' design and implementation processes.
146. This approach also fails to empower them and can depoliticize the IPs' struggles by framing consultation processes as neutral, technical exercises rather than political negotiations about land and resource control (Flemmer, 2022). The evaluation came across concerns that FPIC processes

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<sup>43</sup> GCF/B.39/20

<sup>44</sup> There is no universal standard on the cost of a process as context specific and variable as FPIC. Estimating the cost of an FPIC is more art than science. A 2012 report on an UN-REDD+ FPIC pilot in Viet Nam, found that the cost was USD 115,000 for 78 villages over a 6-month period. Separately, case studies in the TNC Human Rights Guide suggest that the cost of FPIC for high-impact, large-scale extraction projects range from USD 250,000 to USD 5,000,000, with a best-case scenario of USD 800,000 for one year, and contingency of up to USD 1,500,000 should unexpected issues emerge. The cost of FPIC for large, low-impact conservation projects ranges from USD 50,000 to USD 500,000, with a best-case scenario budget of around USD 200,000 for one year, and an additional USD 80,000 for contingencies. Sources: (i) FPIC for REDD+ in the Asia Pacific region: Lessons learned, challenges and recommendations (UN-REDD Programme, 2012); (ii) Human Rights Guide for Working with Indigenous peoples and Local Communities (The Nature Conservancy, 2024).

and overall engagement with IPs can sometimes reduce complex power dynamics into bureaucratic steps, prioritizing legal compliance over genuine engagement and reinforcing existing power imbalances rather than challenging them. Country case studies provide examples to illustrate the challenges posed by the implementation paradox and the varying quality of FPIC processes:

- In one case study, it was reported that the involvement of IPs, while formalized, frequently occurred late in the project design and implementation process, meaning that consultations were structured in ways that limited the IPs' actual decision-making power before the project started. According to interviews with Indigenous leaders, FPIC processes are "administrative" rather than a means to ensure the rights of IPs to autonomy and self-determination.
  - Another case study found that the project had significant consultations with national and district consultants but limited consultation with communities and IPs. The locations for FPIC consultations were hotels in the capital city, restricting opportunities for community representatives to participate.
  - In a third case study, respondents described the consultation as an "express and superficial" process. They mentioned that IPs were pressured to sign agreements hastily, with the threat that if they refused, "the project would be moved to another location". This approach did not allow sufficient time for communities to fully understand the project or contribute to its planning. Additionally, other interviewees raised concerns about resource limitations affecting the consultation process, such as the need for more substantial financial support and sufficient time to ensure proper engagement during the project design phase.
147. The evaluation further finds that transparency and access to FPIC documentation vary across GCF projects. An IEU analysis found that of the 128 IPs-relevant projects, only 35 projects (27 per cent) submitted FPIC-related documentation. Out of the 35 projects submitting FPICs, the evaluation found complete FPIC documentation for only 16 projects. Some FPIC-related information was included in the remaining 19 projects, but it lacked sufficient detail. The low quality of this sample is concerning, considering 54 per cent of relevant projects have provided insufficient documentation of this crucial process.
148. Further examination of the quality of the FPIC documents presents an even more perturbing picture. Only five of the 16 projects that submitted complete FPIC documentation delivered good quality information, including details on gender-disaggregated data on those consulted, summaries of the consultation process, key points of negotiation, and the terms of agreement between the AE and IPs or IPOs.
149. According to the IEU's assessment, many AEs have only provided vague FPIC implementation plans, with little substantive or contextual details on how these plans will be implemented. This lack of detail significantly undermines the credibility and effectiveness of the FPIC process in these projects.
150. This trend of inconsistent tracking and documenting IPs activities continues after the design phase. Among the 128 IPs-relevant projects, only 62 reviewed projects forecasted results of activities targeting IPs, and 34 projects have a budget for IPs activities.<sup>45</sup> Therefore, interviewees and available documentation suggest that while the GCF approach to IPs appears good in theory, it faces significant challenges in practice. Engagement with IPs is often uncertain during the project's origination, and their participation during implementation can be perfunctory.
151. In contrast to the implementation paradox, the evaluation found that where IPs shape the process to ensure their rights and needs are fully integrated, it leads to sustainable and culturally appropriate

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<sup>45</sup> Evaluation team analysis of 128 IPs-relevant projects documents.

outcomes. For instance, in FP056 in Colombia, some parts of the FPIC processes were done well, such as including Indigenous women in leadership roles. This involvement and the creation of a platform for Indigenous women enabled them to become environmental leaders and replicators of climate adaptation strategies.

152. Moreover, several stakeholders in Colombia mentioned that when an IPO was involved in the FPIC processes, they “fixed” the wrong consultation process and mediated pre-existing conflicts between the different Indigenous communities involved in the project. The positive trend that emerges is that FPIC processes are higher in quality when they involve reliable IPOs and related networks with a long history of Indigenous engagement. In these contexts, FPIC processes are more likely to be comprehensive and meaningful, reflecting the crucial role of local Indigenous leadership in driving successful outcomes.

#### D. CHALLENGES IN ENSURING COMPLIANCE

153. **Finding 23. Due to inconsistencies in the documentation regarding the oversight of the Policy’s implementation after project approval, it is not possible to draw a more significant conclusion on its effectiveness. Monitoring of compliance requirements has limitations, which can expose the GCF and IPs to risks.**
154. Once projects are approved, the GCF’s ability to oversee the Policy’s implementation is reduced. The documentation on the Policy’s implementation is limited and inconsistent, particularly when examining documents related to two key components essential for ensuring compliance with the Policy: (i) IPP or IPPF, which are not mutually exclusive, and (ii) FAA. The evaluation assessed these documents through a desk review and validated the findings through interviews.
155. **IPP and IPPF.** According to the Policy, the IPP and IPPF serve distinct yet complementary roles in managing the impacts of projects on IPs. The IPP is designed to minimize or compensate for the adverse impacts of projects on IPs while enhancing positive outcomes in culturally appropriate ways. IPPs are required when specific activities or locations are defined, and IPs are not the sole beneficiaries. The IPPF, on the other hand, provides a framework of processes and plans to ensure activities align with the Policy, ESP and ESS and includes guidelines for developing and implementing site-specific IPPs. While the role of the IPPF is to identify subprojects requiring more detailed IPPs, only five IPPFs include information on the types of subprojects involved.
156. Among 73 IPs-relevant projects with an IPP or IPPF, around half of their planning documents are merely general outlines, which are inadequate for monitoring compliance with the Policy. The quality and content of IPPs and IPPFs vary considerably. IPPs are typically broad overviews rather than specific plans for IPs and project sites, while IPPFs generally do not identify project sites necessary for developing more detailed IPPs. These shortcomings are exacerbated by the inconsistency in how APRs report on IPP and IPPF across projects. Even when monitoring and evaluation plans are included in IPPs and IPPFs, they lack sufficient details. Of the 29 projects with resettlement documentation, only eight explicitly reference FPIC, an essential precondition for involuntary resettlement. More positively, four out of five resettlement frameworks include FPIC requirements.
157. **FAA conditions.** FAA conditions related to the Policy have increased significantly since its adoption. Specific conditions regarding FPIC, GRM, IPP, and IPPF are expected to improve compliance with the policy. The first IPs-related FAA condition was applied to a project in Antigua and Barbuda, Dominica, and Grenada – FP061 “Integrated physical adaptation and community resilience through an enhanced direct access pilot in the public, private, and civil society sectors of



three Eastern Caribbean small island developing states". The project was approved at B.19 in 2018, shortly after the Policy's adoption, indicating that the Policy was operational almost immediately. Only four projects received IPs-related FAA conditions before the Policy's approval. These early conditions focused on IPs' consent or FPIC, resettlement plan development, and IPPF requirements. Following the Policy's adoption, there was a notable increase in such conditions.

158. The evaluation team identified 76 projects with FAA conditions addressing IPs, most of which were attached to FAAs granted after the Policy's approval in 2018. Of the 72 projects approved during or after B.19 with IPs-relevant FAA conditions, 27 included conditions related to the general application of the Policy. The remaining projects specified requirements for particular Policy elements such as FPIC, GRM, IPP or IPPF. Forty-seven had FPIC conditions, while 45 included conditions for submitting IPPs or IPPFs. Additionally, 26 projects included general conditions regarding FPIC compliance and five provided recommendations on resettlement plans.
159. An analysis of the documentation related to the projects that have received FAA conditions on applying the Policy, FPIC, IPP, or IPPF suggests weaknesses in documenting compliance related to IPs. Most of these conditions remain unsupported by sufficient documentation, and in many cases, the evaluation team has not found any documentation. More specifically:
  - Of the 47 projects with FPIC conditions, eight had complete FPIC documentation, nine had partial documentation, and 30 were yet to submit documentation.
  - Of the 45 projects with conditions on IPP or IPPF, 35 submitted an IPP or an IPPF. Fifteen had only partial information, 20 had more detailed information, and 10 had not submitted any documentation.
  - Of the 27 projects with FAA conditions on general compliance with the Policy, without any further FPIC details or information about IPPs or IPPFs:
    - Fifteen projects shared an IPP or IPPF, 12 did not have any plan, six had sufficiently detailed plans, and nine had generic or perfunctory documentation.
    - Six projects had FPIC documentation, with two providing complete documentation and four offering partial documentation.
160. The absence of documentation may be explained by projects still being in their early stage or inefficiencies in the GCF's monitoring system for ESS compliance. Also, the requirements of the MAF are less detailed than the Policy, which follows a more rights-based approach and demands disaggregated information on IPs engagement, benefits and safeguarding. This mismatch can lead to inadequate monitoring and evaluation of IPs issues, insufficient data-collection, and potential non-compliance with Policy commitments.
161. The rise in the number of conditions is not necessarily a concern and could even be a positive indicator of progress in applying the Policy. It should also be noted that the rise in conditions is also due to many AEs being accredited before the Policy's adoption when compliance requirements were checked in agreements at the project level. The variability in the quality and consistency of documentation could be explained by several factors, such as projects being in their early stages or the inherent flexibility exercised by the GCF. Nevertheless, the variability in monitoring and compliance documentation limits the ability to draw more significant conclusions on compliance.
162. **Capacity of the GCF Secretariat.** Some interviewees with the AEs and IPOs suggested that the GCF's risk assessments often do not fully account for the specific vulnerabilities of IPs. This is expected, given that the GCF has only one full-time staff member and another who works 25 per cent of their time reviewing projects from the perspective of IPs. While this may align with the GCFs' model of second-level due diligence, the diversity and scope of IPs' issues, along with the

number of conditions and covenants raised, strains the capacity of the Secretariat to monitor compliance. As noted in a compliance review report by IRM:

[T]he Secretariat does not have the mandate to test the accuracy and veracity of information supplied by accredited entities, during the design stages of projects. This significantly limits the ability of the GCF to adequately ensure that its policies and safeguards are, in fact, being respected during the design and planning stages of projects. This level of reliance on AEs to comply with GCF policies, with very limited avenues to verify facts on the ground, even when the Secretariat may have reason to doubt information being supplied or when there are external sources of information telling a different story, leaves the GCF extremely vulnerable to policy and safeguard non-compliance that can result in huge reputational risks to the Fund.  
Independent Redress Mechanism (2022)

163. The risk of non-compliance with the Policy persists, driven by the increasing number and diversity of GCF projects and AEs, and the corresponding need for thorough due diligence both before and after project approval.

## Chapter 6. CONCLUSIONS AND RECOMMENDATIONS

### A. KEY CONCLUSIONS

164. The GCF is a vital pillar in climate finance's global architecture. Its prominent position in this architecture means the GCF's approach to IPs extends beyond its articulation and implementation. It also sets a normative precedent, shaping the broader discourse on IPs and climate finance. Against this background, the GCF's approach to IPs demonstrates many notable strengths while presenting significant opportunities for improvement.
165. At the time of its approval, the GCF's policy framework set a relatively high standard, conveying a worthy message across its vast network about the historical and rightful position of IPs in climate ambition. Nevertheless, this evaluation identified two key dimensions of the Fund's approach related to the GCF's position and contributions.
166. On the one hand, the GCF aspires to enhance the rights of IPs and channels climate finance to several projects around the world that directly benefit IPs. The GCF's ability to programme at scale, regardless of a country's income status, and to provide highly concessional support targeting vulnerable and marginalized communities represents a powerful signal and a meaningful contribution. Currently, the GCF emphasizes a "do-no-harm" approach, focusing on safeguarding IPs from any potential adverse impacts caused by its projects. This approach is commendable. However, this approach is not fully implemented as intended. Several institutional measures can be corrected to improve this implementation. For instance, to fully realize its compliance-focused approach, many aspects of compliance need to be established, reinforced or calibrated. Additionally, the use and integration of traditional knowledge in GCF activities remain limited.
167. While the GCF positions itself as a second-level due diligence institution in matters related to IPs, it has yet to strike a balance between applying the Policy flexibly and ensuring compliance with minimum standards across the immense diversity of projects and AEs. For example, FPIC remains more of an art than a science, posing an ongoing challenge for the GCF to ensure that FPIC is fully followed as intended by the Policy and that a robust FPIC process contributes positively to a project's results. Similarly, the rights and concerns of IPs are to be further ensured and addressed when project-level GRMs function effectively. However, GRM mechanisms face challenges related to access by IPs and limited oversight of their reporting.
168. The second dimension relates to parts of the Policy that aspires to enhance the rights of IPs. The Policy's implementation is rooted in and subject to the national context. Without state recognition, the GCF has limited means to operationalize certain aspects of the Policy, particularly provisions that affirm the right of IPs to own, use, develop and control lands, territories, and resources, as well as other assertive elements of the Policy. Therefore, the effectiveness of GCF FPs is subject to national contexts and how national legal frameworks perceive IPs. GCF projects often navigate the challenge by avoiding programming directly with IPs or not formally identifying them as such. This approach can create a paradox where, despite the Policy's intentions, GCF resources may fail to address the needs of IPs, further disadvantaging these already socially and environmentally vulnerable communities. While the Policy is well-intentioned, its implementation needs more significant support, some of which fall within the GCF's sphere of responsibilities and opportunities. Although the Policy is perceived as flexible enough to accommodate various national contexts, this flexibility has also led to multiple interpretations and ambiguities. These issues are not clearly

addressed in the Policy's Operational Guidelines. The GCF lacks mechanisms for tracking and reporting IPs-related outcomes at the portfolio level, with similarly limited capacity at the project level. This presents challenges to managing IPs' contributions and results. Furthermore, the evaluation finds that the GCF's contributions to IPs are currently limited to financial resources. There is no evidence to suggest that the GCF independently advances the welfare of IPs beyond the provision of funding. The added value of the GCF comes from the availability of resources in contexts where IPs can access its support.

169. The evaluation concludes in its review of the implementation of the IPs Policy that certain aspirations of the Policy, including those related to rights, recognition and resources, are not fully operationalized. This evaluation finds no indication that the GCF has contributed to a paradigm shift for IPs. Its contributions remain confined to providing financial resources and safeguarding rather than catalysing transformational change through policy change, depth of change, sustainable impact and knowledge-sharing, which are the signs of a transformational change.
170. A core issue is the challenge IPs face in directly accessing climate finance through the GCF. This evaluation finds that the GCF's business model is not directed to focus on supporting IPs, with its modalities, funding windows, and processes lacking the nuanced mechanisms and flexibility needed to cater specifically to IPs or provide them with direct benefits. Due to its passive approach to project origination and focus on countries and AEs, the GCF has not actively pursued a portfolio with IPs. Access to the GCF is already perceived to be a challenge regardless of the capacity of the recipient country or the AE. For IPs, this challenge is often compounded to the point of being insurmountable.
171. Confronting this challenge presents the GCF with a critical opportunity to adopt a more intentional and proactive approach to advancing climate action through and for IPs. Indeed, evidence shows that when IPs and IPOs are meaningfully consulted and purposefully integrated into climate activities, the results are overwhelmingly positive for climate outcomes.
172. The international narrative on IPs has matured since the GCF Board adopted the Policy in 2018. This change was evident in COP29's decision to elevate the voices of IPs, and the emphasis placed on IPs in the Global Biodiversity Framework adopted in 2022 under the Convention on Biological Diversity (Convention on Biological Diversity, 2022). While the evaluation acknowledges the significance of these global outcomes, a future review of the Policy and its accompanying Operational Guidelines would present an opportunity to more clearly define GCF's important role in supporting IPs in implementing climate action.

## B. KEY RECOMMENDATIONS

173. This evaluation makes five key recommendations, from urgent, short-term actions to long-term strategies. The first three focus on reinforcing the GCF's "do-no-harm" approach to IPs. The latter two consider possible strategies the GCF can adopt to better benefit IPs.
174. **Recommendation 1. In the short term, the GCF should continue to reinforce the IPs Policy and Operational Guidelines while calibrating its operational tools to fully implement the intended objectives of the Policy.**
175. The evaluation found that the Policy is well regarded for many of its provisions. However, there is room for greater clarity and certainty. Further adjustments are necessary to fully integrate it into the GCF programme and operations if its intended objectives are to be fully implemented. The Board and the Secretariat should consider the following actions.

- Promote awareness among NDAs and AEs of the Policy's intent, including by leveraging the IPAG's legitimacy and expertise.
- Update the Operational Guidelines to include and address key areas such as benefit-sharing mechanisms, grievance redress integration, consultation standards, and the curation and integration of IPs' climate knowledge. Further, operationalize the inclusion of traditional knowledge in FPs and implementation with specific guidelines and operational tools.
- Future IPs Policy updates should reflect the intent of emerging normative priorities, such as locally led adaptation, enhanced participatory governance, and the integration of traditional knowledge. The GCF should maintain its efforts to lead by example by aligning the Policy with the standards set by UNDRIP and ILO 169, supporting the self-determination rights of IPs in climate action. Additionally, the GCF should continue leveraging links with platforms like the LCIPP to ensure alignment with evolving normative guidance.

176. **Recommendation 2. In the short to medium term, the GCF Secretariat should establish mechanisms and provide resources, including technical and financial support, for the effective implementation of the IPs Policy, in line with its aspirations.**

177. To ensure the Policy achieves its intended objectives, the GCF Board and the Secretariat should focus on enabling its effective implementation by providing clear pathways and support mechanisms. The following actions should be prioritized.

- Creating an enabling environment for IPs:
  - The GCF should acknowledge and support extra time, expertise, and funding needed to involve IPs in projects effectively.
  - The Secretariat should further integrate the Policy into GCF operational and strategic documents. When reviewing country ownership principles, consider the lessons from implementing the Policy in different national contexts. The GCF should consider (i) introducing nudges and incentives for AEs and NDAs to support the Policy's implementation, and (ii) establishing institutional mechanisms and provision of resources to encourage AEs to develop IPs-focused projects. These could include simplified processes, technical support, additional funding to strengthen compliance with the Policy when IPs are included, and support for applying traditional knowledge in climate actions.
  - The GCF should consider exploring opportunities to advance the narrative on IPs in contexts where the full intent of the Policy cannot be implemented due to preceding national legislation. The GCF can facilitate dialogues between IPs and NDAs, support the development of country programmes that embrace IPs, and seek guidance from IPAG and LCIPP.
  - The Secretariat should consider providing greater flexibility and opportunities to intentionally stimulate the development of IPs-focused projects, actively fostering their growth rather than passively waiting for them to emerge. For instance, the Secretariat should explore the use of measures that may include, but are not limited to,
    - + Allocating resources to support FPIC processes that involve IPs.
    - + Offering concessional finance for activities involving IPs, particularly to incentivize private-sector AEs to programme projects with the IPs in a way that meets the aspirations of the Policy.
    - + Allowing flexibility in linking Indigenous traditional knowledge with project origination and activities.

- Tailoring GCF's support modalities to better target IPs:
  - Leverage the PPF. Optimize and utilize the PPF to support addressing the needs of IPs at the initiation of project design. This would involve providing resources to reach IPs communities, ensuring meaningful IPs participation throughout the GCF project cycle, supporting FPIC-related activities and improving IPPs and IPPFs.
  - Maximize RPSP potential. Expand the RPSP to support the engagement of IPs in national climate investment planning and facilitate Indigenous-driven proposals. This would include ensuring purposeful engagement with IPs by supporting FPIC and conducting meaningful consultations with IPs throughout the GCF project cycle.
  - Harness Readiness Results Management Framework opportunities. Provide the Framework with the means to monitor the engagement and contribution of IPs. Further support the Policy's implementation by developing guidelines through readiness, including clear guidance for DPs and NDAs in effectively engaging with IPs.
- Improving monitoring in projects involving IPs:
  - Develop and implement specific indicators, including disaggregated data on IPs, to monitor benefits and results for IPs across the project portfolio.
  - Develop project-level indicators for AE-led evaluation and capture co-benefits to ensure accountability and measurement of project progress. Improve tagging and further refine the definitions of IPs used by the GCF.
  - Track changes in gender equality through GCF projects. Integrate gender-disaggregated data into IPs-relevant projects and track gender-specific outcomes, focusing on empowering Indigenous women and addressing their unique challenges and potentials.

178. **Recommendation 3. The GCF should urgently address the limitations in its planned oversight of compliance, ensuring sufficient flexibility to adapt the Policy to a diversity of contexts and non-compliance risks.**

179. Given its second-level due diligence role and compliance-based architecture, the GCF should address the burden of compliance and the risks of non-compliance. This evaluation recommends a non-exhaustive list of possible measures and operational recommendations to explore, as listed below.

- First, reinforce the oversight of adherence to the Policy at project approval and during implementation, as even a small risk of non-compliance with GCF policies can have serious consequences for already vulnerable IPs. The GCF Secretariat should support AEs in complying with the Policy's provisions and intended objectives. This support can include (i) enhancing IPs-relevant information in monitoring, reporting and evaluation tools such as APRs and AE-led evaluations, (ii) strengthening IPO networks to support oversight and integrating information about IPs in the IRMF and the MAF, and (iii) providing AEs with support and flexibility in delivering this information.
- Second, the GCF needs to build its capacity to monitor compliance. Building the capacity of the Secretariat by mainstreaming the Policy can play a key role in this effort. As the Secretariat launches operations under a new structure, ensuring the compliance function remains strong from an IPs perspective is vital. For instance, initiatives such as staff training and sensitization and enhancing human resources for better engagement with IPs, AEs and NDAs should continue to be explored to sustain the meaningful involvement of IPs throughout the project cycle.

- Third, the IPAG's role in project review and monitoring can be strengthened, as it is currently limited. Achieving this requires clarifying and formalizing its institutional links with various GCF entities, such as the Board, different areas of the Secretariat, NDAs, AEs and other strategic partners. Additionally, its resourcing should align with any evolution in its increasing roles and responsibilities. The GCF should further actively engage with NDAs and AEs on IPs issues, build a cadre of IPs and IPOs able to engage with NDAs and AEs across countries, and ensure more prominent and vigilant monitoring of the Policy's components.
  - Fourth, the Secretariat should enhance compliance mechanisms and monitoring tools at the operational level to ensure effective implementation of the Policy across GCF portfolio. This can be achieved by (i) establishing minimum standards and providing templates for IPPFs and IPPs, and (ii) revising section 4 of the APRs to include a dedicated section on IPs. This section should be completed for projects implemented in IPs' territories. It should include updates on the progress of IPPs and guide AEs on how to complete it.
  - Finally, the GCF should continue building and promoting grievance mechanisms at all levels, ensuring they are accessible to IPs communities while respecting their systems and institutions. Additionally, the GCF should consider the role of IPOs and civil society actors in supporting the monitoring of IP-related operations within GCF projects. The evaluation also highlights the need for an exit strategy for projects upon completion or suspension.
180. **Recommendation 4. In the medium to long-term, the GCF must address fundamental systemic barriers within the business model that limit the extent to which IPs can access the GCF. The GCF should consider an IPs-specific window or programme.**
181. The Policy states that the GCF may allocate funds to support IPs if required and if they are not adequately benefiting from GCF support. This evaluation recommends operationalizing these provisions and establishing a specific window for the GCF to consider a specific strategic and portfolio commitment towards the IPs. Such a window would include several elements at once:
- Strategic portfolio commitment. With this window, the evaluation recommends allocating a dedicated portion of the GCF resource envelope. The window's strategic focus should provide IPs access to GCF resources through institutional processes customized to meet their unique needs and respect their cultures.
  - Customized business model. The window should leverage the social capital and intermediary role of trusted IPOs and relevant organizations engaging with IPs and IPAG to the extent possible. It should use the existing capacity of IPOs or other trusted partners with a proven track record, established trust and requisite experience in working with specific IPs communities. Further, the processes under the window should accommodate the opportunities and limitations of working with such partners.
  - An IPs-oriented culture. The full exploration of the window should be underpinned by an institutional structure and organizational culture that regards IPs as rightful stewards and custodians of resources and territories. The window should include dedicated resources and time for project preparation with IPs. This could encompass allocated resources for FPIC throughout the project cycle, acknowledgement of traditional knowledge and practices, capacity-building, and covering additional financial costs associated with engaging IPs. It should also account for the relatively small ticket size, longer time frames, greater flexibility and resources required, and a qualitatively suitable approach based on meaningful consultations throughout the project.

- Outcomes. This window would enable the GCF to move beyond one-off and project-level benefits towards an intentional paradigm shift for IPs. Providing a systemic and deliberate means to directing the benefits of GCF support to IPs, this window would align the GCF with other climate funds while creating opportunities for effective and sustainable pathways towards achieving a paradigm shift.
182. **Recommendation 5. The GCF must further clarify its strategic position on IPs beyond seeking inputs before projects. As the GCF articulates its position/stance through ongoing restructuring and strategic decisions, providing clear direction on its approach to IPs is essential.**
183. There are several areas where the GCF could clarify its approach, as listed below.
- The GCF's position on the balance between flexibility and prescription. Clarity regarding this balance is essential to reconcile the risk of noncompliance with GCF policies on the one hand and trust, flexibility, and project autonomy on the other. This should be clearly defined in guidelines and operational tools.
  - The GCF's approach to IPs and whether it intends to remain a passive, second-level due diligence institution or actively support IPs. While the GCF explores increased orientation towards regions, it should clarify its position on the rights of IPs and strengthen IPs' institutions and their role within national discourses.
  - The GCF's use of its high-profile. This evaluation recommends that the Fund use its prominent position in climate finance architecture to set the standards for good faith negotiations, engagement and empowerment of IPs in climate action project design and implementation.
  - The GCF's enabling role. Given the Fund's increasingly specialized orientation towards the regions, the evaluation recommends the GCF explore its potential to create enabling environments for IPs to engage in climate action. More broadly, it should shift the GCF's organizational culture from a focus on compliance to a meaningful engagement with IPs.



## ANNEXES



## Annex 1. LIST OF RESPONDENTS

### GCF Secretariat

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Cecilia De Castro	Sustainability Specialist	CIO-FO (former OSI)
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### Country case studies

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Keith Therese Mamaril	GAD Specialist	Philippine Commission on Women	Philippines
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Sarah James	Adviser to the Director	Department of Agriculture	Vanuatu
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Arian Toka	Project Team	Global Green Growth Institute	Vanuatu
Corey Huber	Project Team	Global Green Growth Institute	Vanuatu

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Tony Kaltong Luke	Project Team	Global Green Growth Institute	Vanuatu
Glarinda Andre	Program Team Leader	Live and Learn Environmental Education Vanuatu	Vanuatu
Serge Warakar	Deputy Program Leader	Live and Learn Environmental Education Vanuatu	Vanuatu
Abraham Nasak	Acting Director General	Ministry of Climate Change	Vanuatu
Florence Iautu	National Advisory Board Manager	Ministry of Climate Change	Vanuatu
Nelson Kalo	Acting Director, Department of Climate Change	Ministry of Climate Change	Vanuatu
Erickson Sammy	Director Water Resources, Department of Water Resources	Ministry of Lands and Natural Resources	Vanuatu
[Focus group 9]: 5 women, 4 men		Nakere South Santo Area Council Community of Nakere Village Project site for VANKRIP	Vanuatu
Julia Marango	Project Officer	National Advisory Board	Vanuatu
[Focus group 8]: 6 women (1 disabled), 2 men		Nguna Pele Area Council Community of Maliliu Community Disaster Committees VCCRP Project site	Vanuatu
Taman Tatu	VCCRP Community Officer	Nguna Pele Area Council	Vanuatu
Hon. Mr. Ralph Regenvanu	Member	Parliament	Vanuatu
Louise Nasak	Project Manager	Save the Children Australia/ Save the Children Vanuatu	Vanuatu
Dirk Snyman	Climate Finance Coordinator	South Pacific Community	Vanuatu
Kara Medina	ESS and GESI Officer	South Pacific Community	Vanuatu
Sunny Seuseu	Program Manager VANKRIP Project	SPREP – Pacific Regional Environment Programme	Vanuatu
Moriah Yerta	Project Coordinator	Vanuatu Climate Information Services for Resilient Development	Vanuatu
Jesse Benjamin	CEO	Vanuatu Utilities Regulatory Authority	Vanuatu





## Annex 2. DOCUMENTS CONSULTED

### GCF Board decisions

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