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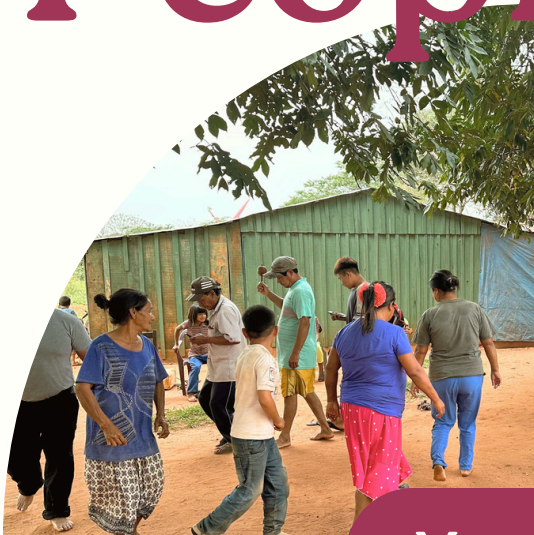
Independent  
Evaluation  
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TRUSTED EVIDENCE  
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HIGH IMPACT

Independent Evaluation of the Green Climate Fund's Approach to

# Indigenous Peoples



March 2025



Annexes to the Final Report



GREEN CLIMATE FUND  
INDEPENDENT EVALUATION UNIT

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

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## ANNEXES TO FINAL REPORT

03/2025

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## CONTENTS

ABBREVIATIONS .....	v
---------------------	---

ANNEXES .....	1
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ANNEX 1. GCF APPROACH TO INDEGENOUS PEOPLES THEORY OF CHANGE .....	3
--	---

ANNEX 2. DATA SOURCES AND METHODOLOGY FOR IDENTIFYING INDIGENOUS PEOPLES-RELEVANT PROJECTS .....	5
---	---

ANNEX 3. BENCHMARKING .....	14
-----------------------------	----

ANNEX 4. MAINSTREAMING INDIGENOUS PEOPLES' ISSUES IN GCF – INTERNAL COHERENCE .....	80
--	----

ANNEX 5. FPIC DOCUMENTATION IN INDIGENOUS PEOPLES-RELEVANT PROJECTS	87
---	----

ANNEX 6. ANALYSIS OF FUNDED ACTIVITIES AGREEMENT CONDITIONS.....	90
--	----

ANNEX 7. ANALYSIS OF INDIGENOUS PEOPLES PLANNING FRAMEWORKS AND INDIGENOUS PEOPLES PLANS .....	92
---	----

ANNEX 8. ANALYSIS OF RESETTLEMENT PLANS.....	96
--	----

REFERENCES .....	101
------------------	-----

## TABLES

Table A - 2.1. List of 128 projects considered by the evaluation as IPs-relevant .....	7
Table A - 3.1. GCF IPs Policy adherence to UNDRIP .....	19
Table A - 3.2. GCF IPs Policy adherence to ILO Convention 169 .....	20
Table A - 3.3. GCF IPs Policy adherence with UNFCCC decisions and agreements.....	21
Table A - 3.4. Evidence table 1: Standards, inquiry areas and explanations for the benchmarking process .....	31
Table A - 3.5. Evidence table 2: The importance of components of the UNDRIP to GCF IPs engagement.....	36
Table A - 3.6. Evidence table 3: Benchmarking the GCF IPs Policy against UNDRIP .....	44
Table A - 3.7. Evidence table 4: Benchmarking the GCF GCF IPs Policy against ILO Convention 169 .....	52
Table A - 3.8. Evidence table 5: Importance and implications of UNFCCC decisions and agreements for the GCF IPs Policy and implementation .....	61
Table A - 3.9. Evidence table 6: Adherence of comparator policies to foundational and operational standards from UNDRIP and ILO Convention 169 .....	63
Table A - 3.10. Evidence table 7: Adherence of FAO and UNDP IPs policies against foundational and operational standards from UNDRIP and ILO Convention 169 .....	75
Table A - 4.1. Varied definitions of ‘meaningful’ and ‘effective’ consultation in the revised ESP, GCF IPs Policy and environmental and social safeguards standards.....	85
Table A - 4.2. Definition of ‘Indigenous Peoples’ and ‘disadvantaged or vulnerable’ groups in GCF IPs Policy and revised ESP .....	86
Table A - 5.1. FPIC documentation in IPs-relevant projects.....	87
Table A - 7.1. IPP and IPPF definitions in GCF IPs Policy and operational guidelines.....	93
Table A - 7.2. Summary: analysis of IPPs.....	95
Table A - 7.3. Summary: analysis of IPPFs .....	95
Table A - 8.1. Resettlement plan definitions and guidance in GCF IPs Policy, GCF environmental and social safeguards and GCF ESP.....	97

## FIGURES

Figure A - 1.1. Theory of change of the GCF approach to Indigenous Peoples .....	4
Figure A - 3.1. The benchmarking approach.....	15
Figure A - 3.2. Components of the benchmarking approach.....	16

## BOXES

Box A - 4.1. Overview of GCF policies and frameworks considered for internal coherence check .....	82
Box A - 6.1. Statistical evidence of differences in conditions between private and public sectors .....	91

## ABBREVIATIONS

<b>ADB</b>	Asian Development Bank
<b>AE</b>	Accredited entity
<b>AfDB</b>	African Development Bank
<b>CBNRM</b>	Community-based natural resource management
<b>COP</b>	Conference of the Parties
<b>DAE</b>	Direct access entity
<b>EE</b>	Executing entity
<b>ESMP</b>	Environmental and social management plan
<b>ESMS</b>	Environmental and social management system
<b>ESP</b>	Environmental and social policy
<b>ESS</b>	Environmental and social sustainability
<b>FAA</b>	Funded activity agreement
<b>FP</b>	Funding proposal
<b>FPIC</b>	Free, prior, and informed consent
<b>FWG</b>	Facilitative Working Group
<b>GCF</b>	Green Climate Fund
<b>GPBHR</b>	United Nations Guiding Principles on Business and Human Rights
<b>HVRM</b>	Highly vulnerable rural minority
<b>ICP</b>	Informed consultation and participation
<b>IDB</b>	Inter-American Development Bank
<b>IEU</b>	Independent Evaluation Unit
<b>IFAD</b>	International Fund for Agricultural Development
<b>IFC</b>	International Finance Corporation
<b>ILO</b>	International Labour Organization
<b>IPAG</b>	Indigenous Peoples Advisory Group
<b>IPBES</b>	Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services
<b>IPCC</b>	Intergovernmental Panel on Climate Change
<b>IPP</b>	Indigenous Peoples plan
<b>IPPF</b>	Indigenous Peoples Planning Framework
<b>IRM</b>	Independent Redress Mechanism
<b>ISS</b>	Integrated Safeguards System
<b>LCIPP</b>	Local Communities and Indigenous Peoples Platform
<b>M&amp;E</b>	Monitoring and evaluation

<b>MEL</b>	Monitoring, evaluation, and learning
<b>OS</b>	Operational safeguards
<b>RPSP</b>	Readiness and Preparatory Support Programme
<b>SBSTA</b>	Subsidiary Body for Scientific and Technological Advice
<b>TOC</b>	Theory of change
<b>UNDP</b>	United Nations Development Programme
<b>UNDRIP</b>	United Nations Declaration on the Rights of Indigenous Peoples
<b>UNEP</b>	United Nations Environment Programme
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change



## ANNEXES

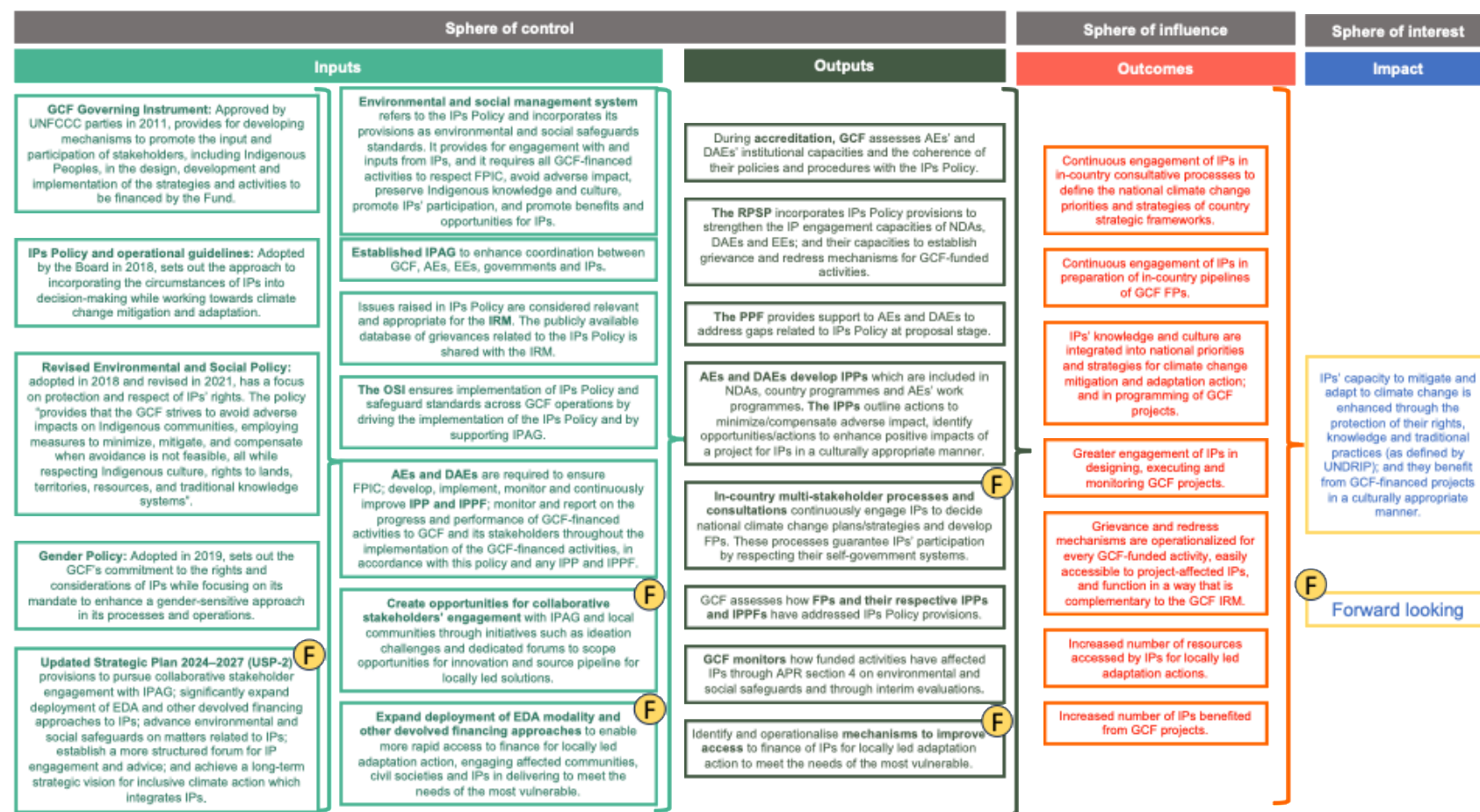


## Annex 1. GCF APPROACH TO INDEGENOUS PEOPLES THEORY OF CHANGE

The evaluation team has reconstructed the theory of change (TOC) underpinning the Green Climate Fund (GCF) approach to Indigenous Peoples (IPs) to better assess the cause-and-effect dynamics between the inputs provided by the Board of the GCF and its Secretariat, the GCF-funded activities and the effects on IPs' rights and benefits. This is presented in Figure A - 1.1. The TOC presents both measures that have already been implemented and forward-looking elements related to future initiatives that will result from the implementation of the updated Strategic Plan (2024–2027). The latter are marked with an “F” in Figure A - 1.1. Key assumptions underpinning the TOC are:

- **Political will and national commitment:** National governments will be willing to engage Indigenous communities meaningfully, respecting their self-governance systems and integrating Indigenous knowledge into national climate strategies.
- **Capacities of accredited entities (AEs) and direct access entities (DAEs):** AEs and DAEs will have or develop necessary capacity and understanding to implement Indigenous Peoples plans (IPPs) effectively and ensure that free, prior, and informed consent (FPIC) is obtained in all projects involving IPs.
- **Accessibility of resources:** Sufficient funding and technical resources will be made available to support the development and implementation of locally led adaptation initiatives by Indigenous communities.
- **Effective monitoring and redress systems:** Grievance mechanisms will be operational and easily accessible to IPs, ensuring their concerns are addressed promptly and effectively in all GCF projects.
- **GCF institutional capacity:** The GCF Secretariat and its partners, including the Indigenous Peoples Advisory Group (IPAG), will continue to have resources and capacity to support the implementation of the Indigenous Peoples Policy (hereafter “IPs Policy”) of the GCF and provide technical support to Indigenous communities and national governments.

Figure A - 1.1. Theory of change of the GCF approach to Indigenous Peoples



Abbreviations: AE = accredited entity; APR = annual performance report; DAE = direct access entity; EDA = enhanced direct access; EE = executing entity; FP = funding proposal; FPIC = free, prior and informed consent; IPAG = Indigenous Peoples Advisory Group; IPP = Indigenous Peoples Plans; IPPF = Indigenous Peoples Planning Framework; IPs Policy = Indigenous Peoples Policy; IRM = Independent Redress Mechanism; OSI = Office of Sustainability and Inclusion; PPF = Project Preparation Facility; RPSP = Readiness and Preparatory Support Programme; UNDRIP = United Nations Declaration on the Rights of Indigenous Peoples; UNFCCC = United Nations Framework Convention on Climate Change

## Annex 2. DATA SOURCES AND METHODOLOGY FOR IDENTIFYING INDIGENOUS PEOPLES-RELEVANT PROJECTS

### A. IDENTIFYING PROJECTS

The evaluation team reviewed all GCF projects approved as of the fortieth meeting of the GCF Board (B.40), 31 October 2024, to identify projects relevant to IPs. IPs-relevant projects are those that can potentially affect IPs, either positively or negatively, and are therefore highly relevant for the application of the GCF IPs Policy and its approach to IPs (Green Climate Fund, 2018a).<sup>1</sup>

The data sources used for this analysis included funding proposals (FPs), available annual performance reports, Tebtebba's tracker (Tebtebba and Elatia, 2025), the GCF Open Data Library and the GCF Integrated Portfolio Management System (iPMS). The methodology for identifying IPs-related matters from FPs approved by B.40 followed these steps:

- 1) Review of Tebtebba's Indigenous Peoples Tracker on GCF Projects (Tebtebba and Elatia, 2025). This review yielded a total of 87 projects.
- 2) Review of IPs-related tags on GCF Open Data Library (GCF Taxonomy) to identify: (i) projects explicitly and directly addressing IPs, or (ii) projects addressing local communities or Indigenous knowledge, including all terms identified in paragraph 16 of the GCF IPs Policy, even if IPs are not explicitly addressed.<sup>2</sup> This step identified a total of 34 projects.
- 3) The above steps yielded a long list, which was subject to a further review. The team reviewed FPs, with an eye for keywords to assess IPs-relevant activities using available information in FP project descriptions and activity budgets in the funded activity agreement (FAA). Outcomes and activities in FPs were qualitatively reviewed for the following:
  - a) GCF activities with IPs as direct and indirect beneficiaries
  - b) GCF activities that have allocated budget to IPs-related activities
  - c) Activities that use traditional, local, and Indigenous knowledge, practices, and species in project origination or implementation
  - d) Development of an environmental and social management plan (ESMP) with IPPs
  - e) The practice of FPIC

A total of 120 projects were identified as a result of steps 1 to 3.

- 4) A review was conducted for IPs-related projects that did not align with the Tebtebba selection. Additional variables were applied, including references to IPs in the FAA agreements, independent Technical Advisory Panel (iTAP) comments, and civil society organization comments. These additional variables increased confidence in accurately identifying IPs-related projects.

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<sup>1</sup> Also see document GCF/B.19/43 (Annex XI to decision B.19/11).

<sup>2</sup> Tags utilizing:

- environmental policies, instruments, plans and strategies > plans and strategies > other strategies and plans > Indigenous Peoples plan (IPP).
- recipients of GCF support > benefited stakeholders > Indigenous Peoples > Indigenous knowledge/local community.

- 5) Separately, another review identified a sub-group of highly relevant projects that were deemed to more directly address IPs. This was based on three criteria: (i) the presence of an ESMP and IPP; (ii) inclusion of IPs-related activities in the FP; and (iii) a specific budget allocation for IPs activities. Projects meeting the ESMP condition and at least one other criterion (ii) or (iii) were categorized as relevant, while the rest of the projects were classified as related but not relevant. At this last step, eight projects were added.

## B. IDENTIFYING READINESS GRANTS

The evaluation also assessed the Readiness and Preparatory Support Programme (RPSP) grants that have contributed to or are supporting IPs. The methodology for selecting readiness grants was applied in the following steps:

- 1) DataLab determined the share of investment of GCF IPs projects through the Readiness Result Management Framework and iPMS categorization/indicators on vulnerable groups.
- 2) Use of internal IEU data sets that included information on the selection of IPs-related readiness grants by applying a two-pronged approach: (i) filtering through tags – the same three tags were used for filtering readiness grants as for FPs: “Indigenous”, “Indigenous Peoples”, “Indigenous Peoples plan” and including all terms identified in paragraph 16 of the GCF IPs Policy; and (ii) filtering through objectives of the specific readiness grants. The RPSP objectives on capacity-building, national adaptation plans and adaptation planning were identified as most relevant based on the 2023 readiness guidebook and the DataLab work on the GCF’s RPSP evaluation.
- 3) After creating an initial list of readiness grants through the above steps, individual readiness grant was checked for its relevance to IPs. A keyword search of a selected list of terms was deployed to review readiness proposals, interim progress reports, completion reports, and deliverables. Finally, the list of relevant RPSP grants was prepared.

## C. LIMITATIONS

The GCF tagging system is not always reliable and is prone to errors and inaccuracies since the tagging process has been performed using artificial intelligence tools. For example:

- FP176 “Hydro-agricultural development with smart agriculture practices resilient to climate change in Niger” includes both “Indigenous Peoples” and “Indigenous Peoples plan” tags (Green Climate Fund, 2021a). However, after cross-checking, the FP clearly mentioned that “The project does not affect forest resources or indigenous people” (Green Climate Fund, 2021a, p. 89) and “This project will be carried out in areas where there are no indigenous people” (Green Climate Fund, 2021a, p. 91).
- FP182 “Climate-smart initiatives for climate change adaptation and sustainability in prioritized agricultural production systems in Colombia (CSICAP)” specified that the project will not have a direct impact on “indigenous reservations”, but an ethnic differential approach was included in the analysis of risks (Green Climate Fund, 2022, p.70).
- In FP068 “Scaling-up Multi-Hazard Early Warning System and the Use of Climate Information in Georgia”, the FP mentioned that there are no known IPs or ethnic groups in the project intervention area. However, stakeholder engagement will be performed to ensure the absence of any project impact on the Indigenous community (Green Climate Fund, 2018b, p.63).

The contradictions in the above examples and statements, particularly regarding the project's level of engagement with IPs, pose challenges in tagging projects as IPs-related and, more importantly, as highly relevant projects that have substantially addressed IPs. As a result, after a more in-depth screening via cross-checking the IPs-related information extracted via keyword searches, the evaluation team decided to restrict the identification to 128 highly relevant IPs projects.

Some synonyms for IPs or relevant keywords may not accurately represent IPs. For example, some literature from other international organizations defines IPs and ethnic groups as two different concepts. Thus, even if the approved FP or project description mentions "ethnic groups" and includes them as beneficiaries in the Environmental and Social Management System (ESMS) framework, the project cannot be identified as IPs-related. Moreover, while the GCF IPs Policy allows self-identifying groups to declare themselves as IPs, some states or governments do not recognize IPs or use different terms to describe them (for example, "distinct groups" or "local communities"). These vague terms may or may not include IPs. Limitation by the absence of legal recognition or identification might further affect the keywords or phrases used by AEs to describe the beneficiaries, hence making it difficult to make a sound judgment on whether the project is in fact IPs-relevant or not. The evaluation applied additional variables in the review process and cross-checked with secondary data to increase confidence in accurately and systematically identifying IPs-relevant projects.

Finally, in relation to the readiness grants selection, the limitations included non-machine-readable documents and deliverables in local languages that made it difficult to check for clear deliverables contributing to IPs.

In conclusion, the evaluation acknowledges the inherently subjective nature of such a selection and review process, but is backed by a rigorous review process informed by constant comparison.

**Table A - 2.1. List of 128 projects considered by the evaluation as IPs-relevant**

FP No.	PROJECT TITLE	AE
FP001	Building the Resilience of Wetlands in the Province of Datem del Marañón, Peru	Profonanpe
FP002	Scaling up the use of Modernized Climate information and Early Warning Systems in Malawi	United Nations Development Programme (UNDP)
FP003	Increasing the resilience of ecosystems and communities through the restoration of the productive bases of salinized lands	Centre de Suivi Écologique (CSE)
FP004	Climate Resilient Infrastructure Mainstreaming (CRIM)	Kreditanstalt für Wiederaufbau Development Bank (KfW)
FP007	Supporting vulnerable communities in Maldives to manage climate change-induced water shortages	UNDP
FP008	Fiji Urban Water Supply and Wastewater Management Project	Asian Development Bank (ADB)
FP011	Large-scale Ecosystem-based Adaptation in The Gambia: developing a climate-resilient, natural resource-based economy	United Nations Environment Programme (UNEP)
FP012	Africa Hydromet Program – Strengthening Climate Resilience in Sub-Saharan Africa: Mali Country Project	WorldBank

FP No.	PROJECT TITLE	AE
FP015	Tuvalu Coastal Adaptation Project (TCAP)	UNDP
FP017	Climate action and solar energy development programme in the Tarapacá Region in Chile	Corporación Andina de Fomento (CAF)
FP018	Scaling-up of Glacial Lake Outburst Flood (GLOF) risk reduction in Northern Pakistan	UNDP
FP019	Priming Financial and Land Use Planning Instruments to Reduce Emissions from Deforestations	UNDP
FP022	Development of arganiculture orchards in degraded environment (DARED)	ADA_Morocco
FP023	Climate Resilient Agriculture in three of the Vulnerable Extreme northern crop growing regions (CRAVE)	Environmental Investment Fund (EIF)
FP024	Empower to Adapt: Creating Climate-Change Resilient Livelihoods through Community-Based Natural Resource Management (CBNRM) in Namibia	EIF
FP026	Sustainable Landscapes in Eastern Madagascar	Conservation International (CI)
FP034	Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda	UNDP
FP035	Climate Information Services for Resilient Development Planning in Vanuatu (Van-CIS-RDP)	Secretariat of the Pacific Regional Environment Programme (SPREP)
FP043	The Saïss Water Conservation Project	European Bank for Reconstruction and Development (EBRD)
FP045	Ground Water Recharge and Solar Micro Irrigation to Ensure Food Security and Enhance Resilience in Vulnerable Tribal Areas of Odisha	National Bank for Agriculture and Rural Development (NABARD)
FP048	Low Emissions and Climate Resilient Agriculture Risk Sharing Facility	Inter-American Development Bank (IDB)
FP049	Building the climate resilience of food insecure smallholder farmers through integrated management of climate risk (R4)	World Food Programme (WFP)
FP050	Bhutan for life	World Wide Fund for Nature (WWF)
FP056	Scaling up climate resilient water management practices for vulnerable communities in La Mojana	UNDP
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	Department of Environment of Antigua and Barbuda (DOE_ATG)
FP062	Poverty, Reforestation, Energy and Climate Change Project (PROEZA)	Food and Agriculture Organization of the United Nations (FAO)
FP069	Enhancing adaptive capacities of coastal communities, especially women, to cope with climate change induced salinity	UNDP



FP No.	PROJECT TITLE	AE
FP072	Strengthening climate resilience of agricultural livelihoods in Agro-Ecological Regions I and II in Zambia	UNDP
FP074	Africa Hydromet Program – Strengthening Climate Resilience in Sub-Saharan Africa: Burkina Faso Country Project	WorldBank
FP078	Acumen Resilient Agriculture Fund (ARAF)	Acumen
FP087	Building livelihood resilience to climate change in the upper basins of Guatemala's highlands	International Union for Conservation of Nature (IUCN)
FP089	Upscaling climate resilience measures in the dry corridor agroecosystems of El Salvador (RECLIMA)	FAO
FP095	Transforming Financial Systems for Climate	French Development Agency (AFD)
FP097	Productive Investment Initiative for Adaptation to Climate Change (CAMBio II)	Central American Bank for Economic Integration (CABEI)
FP100	REDD-PLUS results-based payments for results achieved by Brazil in the Amazon biome in 2014 and 2015	UNDP
FP101	Resilient Rural Belize (Be-Resilient)	International Fund for Agricultural Development (IFAD)
FP103	Promotion of Climate-Friendly Cooking: Kenya and Senegal	German Agency for International Cooperation (GIZ)
FP107	Supporting Climate Resilience and Transformational Change in the Agriculture Sector in Bhutan	UNDP
FP108	Transforming the Indus Basin with Climate Resilient Agriculture and Water Management	FAO
FP109	Safeguarding rural communities and their physical and economic assets from climate induced disasters in Timor-Leste	UNDP
FP110	Ecuador REDD-plus RBP for results period 2014	UNDP
FP113	TWENDE: Towards Ending Drought Emergencies: Ecosystem Based Adaptation in Kenya's Arid and Semi-Arid Rangelands	IUCN
FP117	Implementation of the Lao PDR Emission Reductions Programme through improved governance and sustainable forest landscape management	GIZ
FP118	Building a Resilient Churia Region in Nepal (BRCRN)	FAO
FP120	Chile REDD-plus results-based payments for results period 2014-2016	FAO
FP121	REDD+ Results-based payments in Paraguay for the period 2015-2017	UNEP
FP125	Strengthening the resilience of smallholder agriculture to climate change-induced water insecurity in the Central Highlands and South-Central Coast regions of Vietnam	UNDP
FP126	Increased climate resilience of rural households and communities through the rehabilitation of production landscapes in selected localities of the Republic of Cuba (IRES)	FAO

FP No.	PROJECT TITLE	AE
FP128	Arbaro Fund – Sustainable Forestry Fund	MUFG_Bank
FP130	Indonesia REDD-plus RBP for results period 2014–2016	UNDP
FP131	Improving Climate Resilience of Vulnerable Communities and Ecosystems in the Gandaki River Basin, Nepal	IUCN
FP134	Colombia REDD+ Results-based Payments for results period 2015–2016	FAO
FP135	Ecosystem-based Adaptation in the Indian Ocean – EBA IO	AFD
FP136	Resilient Landscapes and Livelihoods Project	WorldBank
FP137	Ghana Shea Landscape Emission Reductions Project	UNDP
FP141	Improving Adaptive Capacity and Risk Management of Rural communities in Mongolia	UNDP
FP142	Argentina REDD-plus RBP for results period 2014–2016	FAO
FP143	Planting Climate Resilience in Rural Communities of the Northeast (PCRP)	IFAD
FP144	Costa Rica REDD-plus Results-Based Payments for 2014 and 2015	UNDP
FP145	RELIVE – REsilient LIVELihoods of vulnerable smallholder farmers in the Mayan landscapes and the Dry Corridor of Guatemala	FAO
FP147	Enhancing Climate Information and Knowledge Services for resilience in 5 island countries of the Pacific Ocean	UNEP
FP154	Mongolia: Aimags and Soums Green Regional Development Investment Program (ASDIP)	ADB
FP156	ASEAN Catalytic Green Finance Facility (ACGF): Green Recovery Program	ADB
FP158	Ecosystem-Based Adaptation and Mitigation in Botswana's Communal Rangelands	CI
FP159	PREFOREST CONGO - Project to reduce greenhouse gas emissions from forests in five departments in the Republic of Congo	FAO
FP161	Building Regional Resilience through Strengthened Meteorological, Hydrological and Climate Services in the Indian Ocean Commission (IOC) Member Countries	AFD
FP162	The Africa Integrated Climate Risk Management Programme: Building the resilience of smallholder farmers to climate change impacts in 7 Sahelian Countries of the Great Green Wall (GGW)	IFAD
FP163	Sustainable Renewables Risk Mitigation Initiative (SRMI) Facility	WorldBank
FP167	Transforming Eastern Province through Adaptation	IUCN
FP171	Enhancing Early Warning Systems to build greater resilience to hydro-meteorological hazards in Timor-Leste	UNEP
FP172	Mitigating GHG emission through modern, efficient and climate friendly clean cooking solutions (CCS)	Alternative Energy Promotion Centre (AEPC)
FP173	The Amazon Bioeconomy Fund: Unlocking private capital by valuing bioeconomy products and services with climate mitigation and adaptation results in the Amazon	IDB
FP174	Ecosystem-based Adaptation to increase climate resilience in the	CABEI

FP No.	PROJECT TITLE	AE
	Central American Dry Corridor and the Arid Zones of the Dominican Republic	
FP177	Cooling Facility	WorldBank
FP179	Tanzania Agriculture Climate Adaptation Technology Deployment Programme (TACATDP)	CRDB Bank
FP187	Ouémé Basin Climate-Resilience Initiative (OCRI) Benin	FAO
FP189	E-Mobility Program for Sustainable Cities in Latin America and the Caribbean	IDB
FP191	Enhancing Adaptation and Community Resilience by Improving Water Security in Vanuatu	Pacific Community (SPC)
FP193	Peruvian Amazon Eco Bio Business Facility (Amazon EBBF)	Profonampe
FP194	Programme for Energy Efficiency in Buildings (PEEB) Cool	AFD
FP195	E-Motion: E-Mobility and Low Carbon Transportation	CAF
FP196	Supporting Innovative Mechanisms for Industrial Energy Efficiency Financing in Indonesia with Lessons for Replication in other ASEAN Member States	Korea Development Bank (KDB)
FP198	CATALI.5°T Initiative: Concerted Action to Accelerate Local I.5° Technologies – Latin America and West Africa	GIZ
FP199	Public-Social-Private Partnerships for Ecologically Sound Agriculture and Resilient Livelihood in Northern Tonle Sap Basin (PEARL)	FAO
FP200	Scaling up the implementation of the Lao PDR Emission Reductions Programme through improved governance and sustainable forest landscape management (Project 2)	GIZ
FP201	Adapting Philippine Agriculture to Climate Change (APA)	FAO
FP202	Upscaling Ecosystem Based Climate Resilience of Vulnerable Rural Communities in the Valles Macro-region of the Plurinational State of Bolivia (RECEM-Valles)	FAO
FP203	Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals	WWF
FP204	Sustainable Renewables Risk Mitigation Initiative (SRMI) Facility (Phase 2 Resilience focus) [SRMI-Resilience]	WorldBank
FP206	Resilient Homestead and Livelihood support to the vulnerable coastal people of Bangladesh (RHL)	Palli Karma-Sahayak Foundation (PKSF)
FP207	Recharge Pakistan: Building Pakistan's resilience to climate change through Ecosystem-based Adaptation (EbA) and Green Infrastructure for integrated flood risk management	WWF
FP209	Climate Change Resilience through South Africa's Water Reuse Programme ('WRP')	Development Bank of Southern Africa (DBSA)
FP211	Hardest-to-Reach	Acumen
FP214	Thai Rice: Strengthening Climate-Smart Rice Farming	GIZ
FP215	Community Resilience Partnership Program	ADB

FP No.	PROJECT TITLE	AE
FP220	Africa Rural Climate Adaptation Finance Mechanism (ARCAFIM) for East Africa region	IFAD
FP222	Renewable Energy Performance Platform (REPP 2)	CAMCO Management Ltd.
FP223	Project GAIA ('GAIA')	The Bank Of Tokyo Mitsubishi (MUFG_Bank)
SAP001	Improving rangeland and ecosystem management practices of smallholder farmers under conditions of climate change in Sesfontein, Fransfontein, and Warmquelle areas of the Republic of Namibia	EIF
SAP006	Building resilience of communities living in landscapes threatened under climate change through an ecosystems-based adaptation approach	EIF
SAP010	Multi-Hazard Impact-Based Forecasting and Early Warning System for the Philippines	Landbank
SAP015	Promoting zero-deforestation cocoa production for reducing emissions in Côte d'Ivoire (PROMIRE)	FAO
SAP030	Strengthening Climate Resilience of the Lao People's Democratic Republic (PDR) Health System	Save the Children Australia (SCA)
SAP031	<i>Marajó Resiliente</i> : Enhancing the resilience of smallholders to climate change impacts through adapting and scaling up diversified agroforestry systems in the Marajo Archipelago of Brazil	Fundacion Avina
FP225	E-Mobility Program	ADB
FP226	Resilient Puna: Ecosystem based Adaptation for sustainable High Andean communities and ecosystems in Peru	GIZ
FP227	Increase Resilience to Climate Change of Smallholders Receiving the Services of the Inclusive Agricultural Value Chains Programme (DEFIS+)	IFAD
FP228	Cambodian Climate Financing Facility	KDB
FP229	Acumen Climate Action Pakistan Fund	Acumen
FP230	Kuali Fund-GCF	Compañía Española de Financiación del Desarrollo (COFIDES)
FP232	Jordan Integrated Landscape Management Initiative (JILMI)	UNEP
FP234	Tonga Coastal Resilience	UNDP
FP235	Mangroves for climate: Public, Private and Community Partnerships for Mitigation and Adaptation in Ecuador	CI
FP236	Basin Approach for Livelihood Sustainability through Adaptation Strategies (BALSAS)	IFAD
FP237	E-Motion: E-Mobility and Low Carbon Transportation	AFD
FP238	Ecosystems-based Adaptation for resilient Watersheds and Communities in Malawi (EbAM)	FAO
FP239	Building Climate Resilience for Food and Livelihoods in the Horn of Africa (BREFOL)	African Development Bank (AfDB)

FP No.	PROJECT TITLE	AE
FP240	Collaborative R&DB Programme for Promoting the Innovation of Climate Technopreneurship	KDB
FP241	Financing Mitigation and Adaptation Projects (FMAP) in Indian MSMEs	Small Industries Development Bank of India (SIDBI)
FP242	Caribbean Net-Zero and Resilient Private Sector	IDB Invest
FP243	Climate-resilient community access to safe water powered by renewable energy in drought-vulnerable regions of Ethiopia	Ministry of Finance (MoF)
FP246	Climate Resilient Agriculture in Somalia (Ugbaad)	FAO
FP247	Local Climate Adaptive Living Facility Plus (LoCAL+) – West Africa (Burkina Faso, Ivory Coast, Mali and Niger)	West African Development Bank (BOAD)
FP248	Land-based Mitigation and Adaptation through a Jurisdictional Approach in West Kalimantan	GIZ
FP249	Strengthening climate Resilience of Vulnerable Agriculture Livelihoods in Iraq (SRVALI)	FAO
FP250	Achieving emission reduction in the Central Highlands and South Central Coast of Viet Nam to support National REDD+ Action Programme goals (RECAF)	IFAD
FP252	Acumen Resilient Agriculture Fund II	Acumen Fund Inc
SAP044	Empowering Women Groups to Build Resilience to Climate Impacts in the Province of Cunene in South West Angola (CREW Angola)	Sahara and Sahel Observatory

Source: GCF iPMS

## Annex 3. BENCHMARKING

### A. INTRODUCTION

“Benchmarks” refer here to criteria by which an evaluand is judged and compared to other subjects during an evaluation. Benchmark criteria are standards that can be unpacked into areas of inquiry and related to evaluation criteria. The following benchmarking process is a comparative assessment of how well GCF has, does, and could engage with IPs. It involves assessing the GCF IPs Policy and procedures in terms of different foundational and operational standards for engaging with IPs. The benchmarking also assesses a range of comparable climate-finance provisions and delivery organizations. The evaluation looks also at policy implementation through case studies and the portfolio review. This annex describes how the benchmarking is conducted and its subsequent findings.

### B. OBJECTIVES

The objectives of the benchmarking process are to:

- identify and assess key areas of the GCF IPs Policy and the procedures that GCF applies on engagement with IPs considering foundational and operational standards.
- assess the GCF IPs Policy and the procedures that GCF applies to identify areas for improvement informed by an understanding of good policy and procedures by other organizations.

### C. THE APPROACH TAKEN TO THE BENCHMARKING

#### 1. STEPS

The benchmarking process identifies both comparative policy adherence aspects – how well the GCF IPs Policy adheres to globally established declarations and conventions focused on the rights of IPs – and compliance of procedures with global standards for engagement with IPs, including, for example, collective decision-making and consent. The process was conducted in four steps:

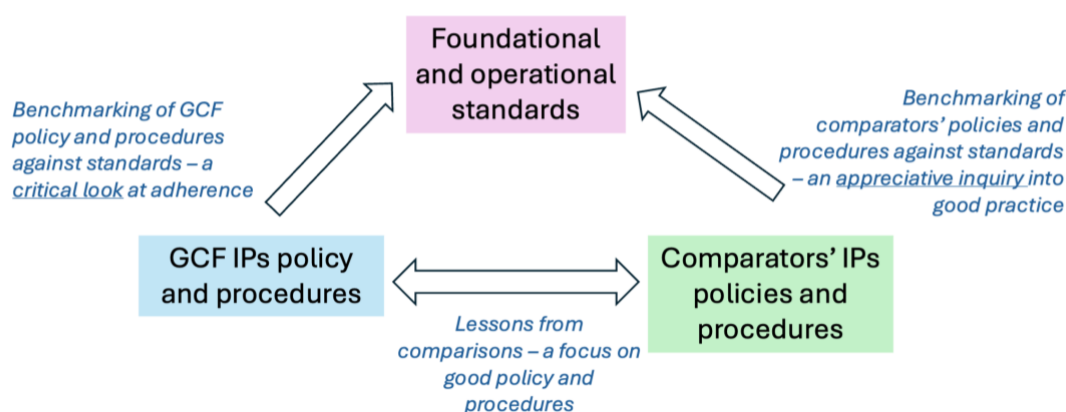
- 1) Secondary information review to identify key foundational and operational standards and to select performance areas and key components in engaging with IPs.
- 2) Assess GCF IPs Policy and procedures against standards.
- 3) Assess a set of positive comparators (climate-finance providing organizations and climate-finance delivery organizations accredited to GCF) against standards.
- 4) Draw lessons from steps 2 and 3 to help identify crucial areas for further assessment in the case studies and portfolio analysis of the IPs evaluation and to identify areas for improvement of the GCF IPs Policy and procedures for implementation.

Figure A - 3.1 and Figure A - 3.2 characterize the benchmarking process. The areas of inquiry include both engagement with, and participation by, IPs and aspects of IPs' knowledge and experience relevant to setting rationale for climate action.<sup>3</sup>

Foundational standards are those related to rights and status, and operational standards include terms and procedures for engagement.

**Figure A - 3.1. The benchmarking approach**

**Principle elements of the benchmarking approach**



Source: IIED evaluation team

The benchmarking process addresses the GCF evaluation criteria in the following ways:

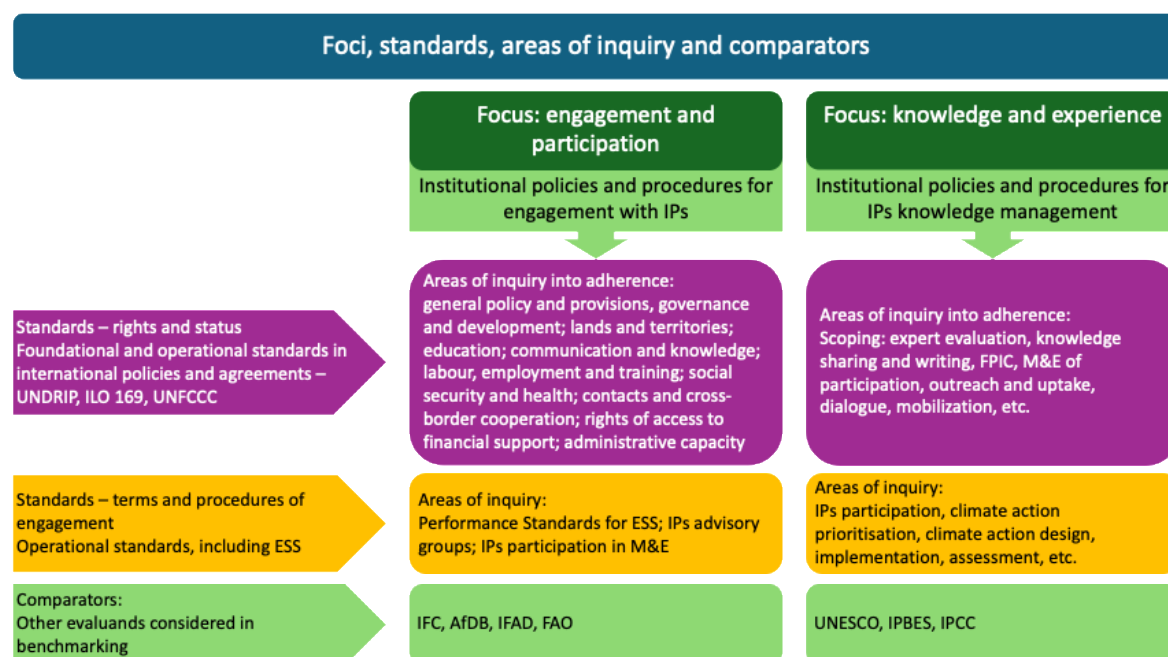
- The **relevance, effectiveness, efficiency, impact and sustainability** of GCF-supported projects and programmes is to a large extent determined by the policies and procedures for IPs and IPs' organizations (IPOs) engagement across the length of the investment cycle.
- GCF **coherence** with other multilateral entities in climate-finance delivery is important for achieving high levels of the evaluation criteria listed in the first point above.
- **Gender equity and social inclusion** are critically important in the context of engaging with IPs and IPOs.
- **Country ownership** of projects and programmes is a success criterion of the highest order for the GCF and is mandated by the United Nations Framework Convention on Climate Change (UNFCCC). The benchmarking process assesses how country-level recognition and appropriation of IPs' rights are taken into account in GCF IPs Policy and procedures.
- In many circumstances and places, the engagement of IPs and IPOs in diagnosing and designing climate risks, vulnerabilities, and action, is a vital way to assure **innovativeness**. The knowledge and experience of IPs and IPOs can fuel innovativeness and ensure, for example, the relevance and effectiveness of projects and programmes. The GCF's policy and procedures for the engagement of IPs and IPOs in driving innovation are assessed both objectively and comparatively in the benchmarking process.

<sup>3</sup> The term "climate action" is used here generically. It refers to a range of investments and activities that aim to reduce the effects of climate change and its impacts, including reducing greenhouse gas emissions; adapting to climate change; integrating climate change measures into policies, strategies and planning; and improving education and awareness.



- The role and contributions of engagement with IPs and IPOs to the **replication and scalability** of projects and programmes is assessed.
- **Identifying unexpected results**, both positive and negative. Understanding results through monitoring, evaluation, and learning (MEL) is crucial to progress on climate action. IPs and IPOs engagement in MEL in GCF-supported projects and programmes is benchmarked.

*Figure A - 3.2. Components of the benchmarking approach*



Source: IIED evaluation team

Abbreviations: IFC = International Finance Corporation; IPBES = Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services; IPCC = Intergovernmental Panel on Climate Change; UNESCO = United Nations Educational, Scientific and Cultural Organization

## 2. SELECTION OF FOUNDATIONAL AND OPERATIONAL STANDARDS

Clearly, the foundational standards for engagement with IPs need to adhere with their rights and recognition in international policy. Principal within these is the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) (United Nations Office of the High Commissioner for Human Rights, 2007) and the International Labour Organization (ILO) Indigenous and Tribal Peoples Convention, 1989 (No 169), hereafter referred to as ILO Convention 169 (United Nations Office of the High Commissioner for Human Rights, 1989). In addition, Parties to the UNFCCC have made decisions and agreements related to engagement with IPs, and these establish standards and/or criteria that GCF should adhere to as a body established under the UNFCCC.<sup>2</sup>

Though non-specific to IPs, the United Nations Guiding Principles on Business and Human Rights (United Nations Office of the High Commissioner for Human Rights, 2012) and the Equator Principles (2021) help frame both the foundational and operational standards and indicate how the “protect, respect and remedy” approach should be implemented.<sup>3</sup>

<sup>2</sup> Decision 4/CP.20/Add.2; decision 6/CP.26; decision 16/CP.27.

<sup>3</sup> The Equator Principles are intended to serve as a common baseline and risk management framework for financial institutions to identify, assess and manage environmental and social risks when financing projects (Equator Principles, n.d.).



The following foundational and operational standards were identified for the benchmarking process. Table A - 3.4 sets out the standards identified and provides examples where adherence assessments are made under the benchmarking. In summary, the following standards and areas of inquiry were used in the benchmarking:

- International policies where adherence by GCF and other organizations will be compared, including UNDRIP; ILO Convention 169.
- Adherence to decisions and agreements related to IPs under the UNFCCC.<sup>4</sup>
- Institutional policies and procedures implementation areas where comparisons of GCF and other organizations' policies and procedures are made, including FPIC, consultation, knowledge-sharing, safeguarding, grievance and redress, implementation for IPs engagement, and capacity development.
- Aspects of environmental and social sustainability where assessments of GCF and comparator organizations' policies and procedures are made, including the International Finance Corporation Environmental and Social Sustainability Performance Standards (IFC ESS), IPOs' access to funding, inclusive governance, IPs advisory groups and IPs' participation in monitoring and evaluation (M&E).

### 3. SELECTION OF COMPARATORS

As comparators, the benchmarking includes other organizations that are either climate-finance providers (banks, funds) or climate-finance delivery organizations (sector programme implementation agencies). For the foundational and operational standards, the AfDB and the IFAD were selected as comparable climate-finance providers. They provide positive, up-to-date cases of policies covering IPs. Both the AfDB Integrated Safeguards System (ISS) and IFAD's IPs engagement policy have been recently revised and updated and therefore represent the leading edge of policies and procedures for IPs engagement (African Development Bank, 2023; International Fund for Agricultural Development, 2022).

The FAO and the UNDP were selected as sector programme implementation agencies accredited with the GCF. Both organizations have updated IPs policies and present potentially positive comparisons.

Key informant interviews with GCF staff indicated the importance of GCF's adherence to the IFC ESS. The document (especially IFC ESS Performance Standard 7 on IPs) was used as a comparator, mainly with regard to operational standards (International Finance Corporation, 2012).

## D. FINDINGS FROM THE BENCHMARKING

A qualitative assessment was made of the importance and implications of the different components of UNDRIP, as expressed in each of the 41 articles of the Declaration, for the engagement and participation of IPs and the integration of IPs' knowledge and experience in climate action.<sup>5</sup> This assessment also examined the importance and implications of the articles with regard to the evaluation criteria used by the GCF. This is shown in Table A - 3.5. This guided the benchmarking

<sup>4</sup> These include decision 1/CP.21; decision 2/CP.23; FCCC/SBSTA/2018/4; decision 2/CP.24; FCCC/SBSTA/2019/5; decision 16/CP.26.

<sup>5</sup> Each article was ranked in terms of whether it was crucial, significant or relevant to IPs engagement and participation, integration of IPs' knowledge and experience, and the GCF evaluation criteria of relevance, effectiveness, efficiency, impact, sustainability, coherence, gender equality and social inclusion (GESI), country ownership, innovativeness, replication and scalability, and unexpected results.

process with regard to the emphases put by GCF and comparators on the different foundational and operational standards derived from UNDRIP.

The structure of ILO Convention 169 was used as a template for benchmarking GCF and comparators and includes general policy, general provisions, governance and development, lands and territories, education, communications and knowledge, labour, employment and training, social security and health, contacts and cross-border cooperation, rights of access to financial support, and administrative capacity.

## 1. KEY ASPECTS OF GCF IPs POLICY

Key aspects of the GCF IPs Policy include its purpose and applicability regarding what the policy attempts to achieve, its applicability, and to whom it applies. The GCF IPs Policy consists of the following statement of purpose: “This Policy will assist GCF in incorporating considerations related to Indigenous peoples into its decision-making while working towards the goals of climate change mitigation and adaptation” and “The Policy allows GCF to anticipate and avoid any adverse impacts its activities may have on Indigenous peoples’ rights, interests, and well-being, and when avoidance is not possible to minimize, mitigate and/or compensate appropriately and equitably for such impacts, in a consistent way and to improve outcomes over time” (Green Climate Fund, 2018a, p.1). Furthermore, GCF’s IPs Policy outlines the actions to minimize and/or compensate for the adverse impacts and identifies opportunities and actions to enhance the positive impacts of a project for IPs in a culturally appropriate manner. Depending on local circumstances, a free-standing IPP may be prepared, or it may be a component of a broader community development plan.

The GCF IPs Policy is considered to apply to IPs irrespective of discernible economic, political, or social vulnerabilities while recognizing that vulnerability will be accounted for in climate action investment design and planning. The Policy applies to the following people and groups: IPs; IPs and local communities; 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 traveller communities, nor people of gypsy or Romany heritage.

The IPs 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” (Green Climate Fund, 2018a, p.5). 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 in or near urban areas but still possess characteristics of a distinct social and cultural group.

## 2. GCF IPs POLICY AND STANDARDS (UNDRIP AND ILO CONVENTION 169)

Table A - 3.6 provides an assessment of how the GCF IPs Policy adheres to UNDRIP, and Table A - 3.7 provides the assessment of how the GCF IPs Policy adheres to ILO Convention 169.

### a. Benchmarking against UNDRIP

In most areas assessed, the GCF IPs Policy clearly adheres to UNDRIP. However, as GCF staff recognize, how well the policy is implemented depends upon the policies and actions of national

designated authorities (NDAs), implementing entities and executing entities (EEs), and how they integrate the GCF IPs Policy into their activities. GCF enforcement of compliance requires careful assessment through the review and thorough assessment of IPPs and IPPFs. The adherence to the UNDRIP assessment indicates certain areas where improvements in the GCF IPs Policy need to be considered. Areas identified where adherence is absent or weak are presented in Table A - 3.1.

**Table A - 3.1. GCF IPs Policy adherence to UNDRIP**

COMPONENT OF UNDRIP	ADHERENCE OF GCF IPs POLICY
Right to autonomy or self-government	Overarching alignment but no further indication of how IPs self-government and autonomy could actually be supported through GCF-funded climate action.
Right to maintain and strengthen their distinct political, legal, economic, social and cultural institutions	IPs' customary institutions are referred to in relation to representation and consultation only, not in terms of self-determination of activities for climate action.
Right to revitalize, use, develop, and transmit to future generations their histories, languages, oral traditions, philosophies, writing systems, and literature	There is a significant gap in the GCF IPs Policy related to the sustainability of IPs knowledge and practice.
Right to establish and control their educational systems and institutions	As above, there is a gap in the GCF IPs Policy related to the sustainability of IPs' climate knowledge and practice.
Right to participate in decision-making	Implicit recognition only in many of the provisions of the GCF IPs Policy.
FPIC	Acknowledged as a key component of IPPs whenever consideration is being given to GCF-financed activities that will affect IPs' lands, territories, resources, livelihoods, and cultures or require their relocation. Emphasis is on FPIC as a means of consultation, not an instrument for self-determined consent.
Right to the conservation and protection of the environment	Rather than conservation and protection, the GCF IPs Policy refers to the right to "develop and control". This discrepancy is important as it differs from both the rights to self-determination and self-government aspects of the foundational standards and the "protect, respect, and remedy" aspects of the operational standards.
Right to determine the structures and to select the membership of their institutions	There is no explicit recognition of the right to self-determine structures and select the membership of their institutions.
Right to have access to financial and technical assistance from States and through international cooperation	Adherence with UNDRIP requires that GCF financing is better tailored to IPs' needs and priorities with targeted support to IPs where equity of benefit-sharing is in doubt.

Source: IIED evaluation team

## **b. Benchmarking against ILO Convention 169**

The GCF IPs Policy largely adheres to ILO Convention 169 provisions in terms of IPs' self-identification, the state government's responsibilities for special measures, IPs' human rights and no discrimination, IPs' cultural safeguarding and protection, the need for meaningful consultation and respect of customary practices. Table A - 3.2 identifies areas where adherence to ILO Convention 169 is absent or weak.

**Table A - 3.2. GCF IPs Policy adherence to ILO Convention 169**

COMPONENT OF ILO CONVENTION 169	ADHERENCE OF GCF IPs POLICY
Social inclusion and rights protection	<p>The role of state governments is articulated through what AEs should do. Host governments are referred to, but in vague terms, related to assessing impacts and consultation. The GCF IPs Policy states that GCF will work with the AEs to develop and implement corrective actions that will bring the activities back into compliance with inclusion and rights. Failure to comply allows GCF to apply unspecified “remedies”.</p> <p>Protection of IPs’ values, etc.: Clear adherence to recognition and protection. However, means and measures for mitigating attacks on IPs’ values through climate action are not addressed in the GCF IPs Policy.</p> <p>Consultation and participation: Establishing means whereby IPs freely participate at all levels of decision-making is not addressed in the GCF IPs Policy. The purpose of the GCF IPs Policy is to assist GCF in incorporating considerations related to IPs into its decision-making while working towards the goals of climate change mitigation and adaptation.</p> <p>Right to decide own priorities: ILO Convention 169 is more explicit and indicates the provisions applied to IPs’ decisions on their development.</p> <p>Customary practices to address offences, penalties from general law, and exaction are not covered in the GCF IPs Policy.</p>
General provisions	<p>Measures taken to implement ILO Convention 169 shall be determined in a flexible manner, with regard to the conditions characteristic of each country. There is no recognition of impacts on other rights and benefits.</p> <p>Adherence through compliance by AEs etc.</p>
Lands and territories	<p>While the cultural importance of lands to IPs is recognized, as are rights of ownership, their usufruct rights, including access to common land and passage for mobility, are not addressed in the GCF IPs Policy.</p> <p>Exceptions for relocation are allowed for.</p> <p>Protection of land rights transmission not addressed directly in GCF IPs Policy.</p> <p>Penalties for unauthorized intrusions is a gap in the GCF IPs Policy.</p> <p>GCF IPs Policy does not address the inclusiveness for IPs in agrarian development programmes.</p>
Labour, employment, training	<p>GCF IPs Policy does not address employment issues, but it does reference ILO Convention 169.</p> <p>GCF IPs Policy does not address issues such as vocational training but it does reference ILO Convention 169.</p>
Social security and health	<p>GCF IPs Policy refers to social vulnerability but social security is not addressed.</p> <p>Provisions for appropriate health services is a gap in the GCF IPs Policy.</p>
Education, communications, and knowledge	<p>Climate action that addresses education, communications and knowledge is a gap in the GCF IPs Policy. This is highly relevant to the ownership of knowledge and to the development of IPs knowledge systems.</p>
Contacts and cross-border cooperation	<p>This is a gap in GCF IPs Policy.</p>
Administrative capacity	<p>Adherence through compliance of AEs, etc.</p>

Source: IIED evaluation team

### c. GCF IPs Policy adherence to UNFCCC decisions and agreements

As set out in Table A - 3.4, the UNFCCC decisions and agreements where adherence is assessed include decision 1/CP.21; decision 2/CP.23; Subsidiary Body for Scientific and Technological Advice (SBSTA) 48 conclusion; decision 2/CP.24; SBSTA 51 conclusion; decision 16/CP.26; and draft decision -/CP.29.<sup>6</sup> Table A - 3.8 sets out the importance and implications of the UNFCCC decisions and agreements for different aspects of the GCF IPs Policy and its implementation. Assessments of GCF adherence to these UNFCCC decisions and agreements are presented in Table A - 3.3.

The introduction to the GCF IPs Policy refers to a UNFCCC Conference of the Parties (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”.<sup>7</sup> Neither the GCF IPs Policy nor the operational guidelines (Green Climate Fund, 2019a) are explicit as to how this will be done.

**Table A - 3.3. GCF IPs Policy adherence with UNFCCC decisions and agreements**

DECISION/AGREEMENT	INTERPRETATION	GCF IPs POLICY ADHERENCE ASSESSMENT
Decision 1/CP.21 Adoption of the Paris Agreement (2015)	Reaffirms the importance of the foundational standards set out in UNDRIP and ILO Convention 169 and calls for the recognition of, and the need to build upon, IPs’ knowledge and experience for investments in climate action. It sets out the expectation of Parties that stakeholders will identify and invest in the curation of IPs’ climate knowledge.	The GCF IPs Policy is weak on issues related to the sustainability of IPs’ climate knowledge and practice.
Decision 2/CP.23 Local Communities and Indigenous Peoples Platform (LCIPP) (2017)	Establishes the LCIPP as a mechanism for IPs’ knowledge management and implies the importance of coordination and collaboration with this mechanism. It requires United Nations bodies (including GCF) to facilitate IPs’ full and effective participation in accordance with their own ways of governance and representation.	Ways to achieve effective participation in accordance with IPs’ own ways of governance and representation are missing from the GCF IPs Policy.
SBSTA 48 conclusions (2018)	Includes that IPs’ climate knowledge is relevant to, and complementary with, scientific climate knowledge.	The GCF IPs Policy is weak on ways to curate and link IPs’ knowledge with scientific knowledge and on the issues related to the sustainability of IPs’ climate knowledge and practice.
Decision 2/CP.24 LCIPP (2018)	Sets up the LCIPP Facilitative Working Group (LCIPP FWG) and points to the importance of collaborative working that subsequent SBSTA 51 conclusions	The GCF IPs Policy does not refer to collaborative work with entities created by the UNFCCC or to the specific areas of work mandated to the LCIPP FWG.

<sup>6</sup> An updated table of relevant decisions and conclusions on the climate change negotiation agenda under the UNFCCC can be found on the LCIPP web portal (Local Communities and Indigenous Peoples Platform, n.d.).

<sup>7</sup> Decision 4/CP.20, para. 5(b) (FCCC/CP/2014/10, Add.2)

DECISION/AGREEMENT	INTERPRETATION	GCF IPs POLICY ADHERENCE ASSESSMENT
	and draft decision -/CP.29 reaffirm.	
Decision 16/CP.26 LCIPP (2021)	Requires that other bodies acknowledge and adhere to LCIPP FWG recommendations on engagement with and contributions from IPs in climate action.	The GCF IPs Policy needs to be updated to include acknowledgement of and adherence to LCIPP FWG recommendations.
Decision 6/CP.26 Report of the Green Climate Fund to the Conference of the Parties and Guidance to the Green Climate Fund (2021)	Focuses on the report of the GCF Board to the COP and provides GCF with guidance, including on engagement with IPs.	GCF needs to be accountable for the ways it balances and incorporates scientific and IPs' climate knowledge resources.  The GCF IPs Policy requires a better explanation of how, and how well, GCF can engage with IPs in countries where IPs' rights and recognition are weak or absent.  Adherence also requires that GCF better addresses aspects of intersectionality in the ways that diverse sets of people, including IPs, are engaged in climate action (such as full integration of gender equality considerations into activities).

Source: IIED evaluation team

### 3. COMPARATORS AND STANDARDS (UNDRIP AND ILO CONVENTION 169)

The recently revised and updated ISS of the African Development Bank (2023) and the updated IPs Policy of the International Fund for Agricultural Development (2022) were selected as positive cases of comparable climate-finance providers. Also, the IFC ESS (especially Performance Standard 7 on IPs) was used as a comparator mainly for operational standards (International Finance Corporation, 2012). As for the GCF IPs Policy, these comparator policies were benchmarked against the criteria developed from UNDRIP and ILO Convention 169. The objective of the positive case comparisons is to conduct an appreciative inquiry to identify good policy and procedures. Table A - 3.9 provides a summary of this benchmark assessment as a narrative description and in a more detailed table.

#### a. Assessment of current versions of AfDB ISS and IFAD IPs Policy

**General policy level:** The IFAD IPs Policy, and protection, customary practices, through its principles of engagement, addresses IPs' self-identification, cultural safeguarding and protection, and customary practices, and self-determination. The AfDB ISS addresses IPs' rights and FPIC within its environmental and social operational safeguard (E&S OS) 7 as applicable to "highly vulnerable rural minorities". The contested nature of IPs' rights in many African countries is not static. As referred to by the United Nations Office of the High Commissioner for Human Rights (2022), these countries' positions are not fixed nor completely adhered to by all parts of government. Foreign, finance, and social affairs ministries within a country may vary on IPs' rights, and national government perspectives do not always align with national human rights institutions or IPs' communities and organizations.

The AfDB ISS uses the terminology of "highly vulnerable rural minorities" (HVRM) in reference to groups qualified as Indigenous Peoples under national legislation, such as forest dwellers, traditional pastoralists, hunter-gatherers, and nomadic groups. The AfDB ISS seeks to "ensure that there is no prejudice or discrimination against project-affected individuals or communities, and give particular



consideration to vulnerable groups, including HVRM groups, especially where adverse impacts may arise, or development benefits are to be shared” (African Development Bank, 2023, p.7). In terms of both concepts and terminology, the AfDB ISS charts a pragmatic course to account for differing national policy frameworks across member African countries – hence the references to HVRM and human-made climate change. The AfDB ISS takes as reference points the Universal Declaration of Human Rights (United Nations, 1948), the Charter of the United Nations (United Nations, 1945), and the African Charter of Human and Peoples’ Rights (Banjul) (African Union, 1981). It does not refer to UNDRIP or ILO Convention 169. General provisions of the revised AfDB ISS focus on ways to improve outcomes in terms of governance, human rights, inclusion and discrimination, contextual risks and impacts (land-use change, conflict), and natural and human-made climate change.

**Governance and economic development:** The IFAD IPs Policy promotes IPs’ economies and products and supports IPs’ community-based enterprises and economic initiatives, giving particular attention to Indigenous women’s and youths’ economic empowerment. The IFAD IPs Policy supports the right to development in dialogue with governments and supports IPs’ participation in defining and implementing policies, programmes and actions that promote territorial management and their economies consistent with preserving their habitat through conservation and adaptation strategies rooted in their ancestral knowledge and practices.

The AfDB ISS supports borrowers in enhancing non-discrimination, transparency, participation, accountability and governance. The AfDB ISS E&S OS7 requires borrowers to properly address discriminatory practices, inequalities, and other factors that contribute to vulnerability. Meanwhile, the E&S OS9 encourages the consideration of environmental and social governance issues in capital market institutions such as development finance entities and stock exchanges.<sup>8</sup>

Both IFAD IPs Policy and AfDB ISS require FPIC for projects and investments affecting IPs. The AfDB ISS defines FPIC as

“a process of dialogue and negotiation that goes beyond mere consultation, where seeking the consent of the HVRM is always the objective and in certain circumstances consent is actually required [...]. The pursuit of FPIC should be undertaken in accordance with the HVRM group’s own customary norms and traditional methods of decision-making with their legitimate representatives and should be culturally appropriate. Any conflict should be resolved within the community membership itself”. (African Development Bank, 2023, p.123).

**Lands and territories:** The IFAD IPs Policy aims actively to provide equitable access to land territories and resources by IPs and enhance their tenure security. AfDB ISS E&S OS5 explicitly addresses land acquisition, restrictions on access to land and land-use, and involuntary resettlement. IPs (termed HVRM) are recognized as being particularly vulnerable to the loss of, alienation from, or exploitation of their land and access to natural and cultural resources. E&S OS5 seeks to avoid involuntary resettlement where feasible or minimize resettlement impacts where involuntary resettlement is deemed unavoidable after all alternative project designs have been explored. E&S OS5 provides detailed information on the circumstances where it is applicable, emphasizing traditional or customary tenure. The AfDB ISS provides for careful assessment and design to help ensure that projects do not inadvertently compromise existing legitimate rights. Importantly, if

<sup>8</sup> It is important to note that regarding governance and economic development, the AfDB ISS refers to the sustainability principles of the World Federation of Exchanges (2018) and the World Bank and United Nations Environment Programme roadmap for a sustainable financial system, neither of which address IPs engagement (Maimbo and others, 2017).

options for IPs' tenure recognition are not possible under national law, investment plans should include measures for the legal recognition of HVRM's perpetual or long-term, renewable custodial or use rights.

**Labour, employment and training:** The IFAD IPs Policy does not address issues related to labour, employment and training. However, AfDB ISS E&S OS2 does and is informed by the ILO Declaration on the Fundamental Principles and Rights at Work (International Labour Organization, 2022) and the United Nations Guiding Principles on Business and Human Rights (United Nations Office of the High Commissioner for Human Rights, 2012). The latter recognizes that IPs are often excluded from legal protection of their human rights.

**Education, communications, and knowledge:** Both IFAD and AfDB policies address this area. The IFAD IPs Policy supports the intergenerational transfer of knowledge between elders and youth and IPs' research on the diversity of their resilience systems and capacities to adapt to climate change. Through the E&S OS7, the AfDB policy aims to recognize, respect, and preserve IPs' culture, knowledge, and practices and to provide them with an opportunity to "adapt to changing conditions that could arise due to project activities in a manner and in a time frame acceptable to them" (African Development Bank, 2023, p.95).

**Right of access to financial support:** IFAD IPs Policy recognizes the need to mobilize and channel climate-finance to IPs. It has tested instruments for doing so. IFAD also seeks to increase IPs' ability to participate in and benefit from climate change actions funded by the GCF, other funds, and the private sector. AfDB will support projects solely for the benefit of IPs and the ISS provides direct support for community-led and collaborative programmes for climate action.

**Capacities for dialogue and administration of measures:** The IFAD IPs Policy provides for the empowerment of IPs through capacity-building to reduce the inequality of youth, taking into account intergenerational relations to ensure that their knowledge, identity, and traditions are passed on to the next generation.

**Additional aspects:** The IFAD IPs Policy has explicit reference to supporting gender equality, food sovereignty, security and nutrition. The AfDB ISS identifies cultural heritage as an inherent and essential part of self-identification and supports continuity in tangible and intangible forms of cultural heritage between the past, present and future. Risks to cultural heritage from climate action are recognized and to be avoided.

**Instruments for policy implementation:** The IFAD IPs Policy stipulates an IPs' forum that can directly channel finance to IPs' communities; social, environmental, and climate assessment procedures; IPs engagement in all steps of the project cycle; M&E outreach and Indigenous households and person-based data disaggregation of IPs by sex and age; funding for regional and country-specific grants to build the capacities of IPOs; and a cross-departmental working group to update the IPs Policy and monitor the policy's implementation. The working group acts as a peer support mechanism and strengthens engagement with IPs. AfDB instruments include protocols for stakeholder engagement and information disclosure with a focus on women's perspectives and vulnerable groups.

## **b. Benchmarking operational standards: IFC performance standards on ESS**

This assessment of the IFC ESS focuses on but is not limited to Performance Standard 7 in relation to IPs. The IFC ESS Policy provides for full respect for the human rights, dignity, aspirations, culture, and natural resource-based livelihoods of IPs and seeks to support respect and preservation of their culture, knowledge, and practices. It allows for self-identification, collective attachment,



separate institutions, and distinct language. The main aim is to avoid the adverse impacts of IFC-supported investments on IPs. IFC requires informed consultation and participation (ICP) of the affected communities of IPs to be contained in a time-bound plan or a broader community development plan with separate components for IPs.

On governance and economic development, the IFC policy promotes sustainable development benefits and opportunities for IPs in a culturally appropriate manner. It involves IPs' representative bodies and organizations, as well as members of the affected communities of IPs. There should be sufficient time for IPs' decision-making processes. IFC requires FPIC for project design, implementation, and expected outcomes related to impacts affecting the communities of IPs.<sup>9</sup> However, IFC states that FPIC does not necessarily require unanimity and may be achieved even when individuals or groups within the community explicitly disagree.

On lands and territories, the IFC policy is first to avoid, then minimize, displacement, to avoid forced eviction, and to anticipate and avoid or minimize adverse social and economic impacts from land acquisition or restrictions on land-use.

### **c. Benchmarking of AEs: FAO and UNDP**

FAO and UNDP were selected as comparators in the benchmarking process as being representative of multilateral AEs with established IPs policies of their own. Their IPs policies were benchmarked against the standards and criteria developed from UNDRIP and ILO Convention 169. The objective was to conduct an appreciative inquiry into sound policy and procedures.

The "FAO Policy on Indigenous and Tribal Peoples", second edition, was published by the Food and Agriculture Organization of the United Nations (2015). In addition, very recently, the "Indigenous Peoples and FAO: A narrative for working together" was published by the Food and Agriculture Organization of the United Nations (2024, August). It identifies mistakes with regard to discussing IPs and principles to guide interactions with IPs. The narrative includes human rights information and technical guidance for FAO personnel working with IPs at all levels and in all regions.

Also, the United Nations Development Programme (2001) published the "UNDP and Indigenous Peoples: A Policy of Engagement". This was followed with their social and environmental standards guidance notes (United Nations Development Programme, 2017). Standard 6 addresses IPs.

Table A - 3.10 provides an assessment of FAO and UNDP IPs policies against foundational and operational standards from UNDRIP and ILO Convention 169 as a narrative description and in a more detailed table.

The FAO policy recognizes the importance of self-determination and IPs' right to choose their development pathways. This is reaffirmed in its recent narrative for working together document (Food and Agriculture Organization of the United Nations, 2024) and is substantiated with reference to article 3 of the UNDRIP. This right to development is considered to be a collective right due to IPs' specific histories, languages, identities and cultures, and recognition of their collective rights to the lands, territories and natural resources they have traditionally occupied and used. The FAO IPs Policy develops this concept further as "development with identity" whereby IPs' sociocultural expressions, values and traditions should be protected by the wider development process.

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<sup>9</sup> The IFC requires FPIC that builds on and expands the process of ICP described in Performance Standard 1. The FPIC will be established through good faith negotiation between the client and the affected communities of IPs. The client will document: (i) the mutually accepted process between the client and affected communities of IPs; and (ii) evidence of agreement between the parties as the outcome of the negotiations.

The FAO makes clear that proper use of the FPIC mechanism enables IPs' communities to either provide or negate consent of development – and climate action – choices. The FAO Policy also addresses IPs' knowledge systems curation. The policy states that the preservation of traditional skills and knowledge systems can support novel solutions to food insecurity, providing effective avenues for sustainable development. FAO prescribes active engagement of IPs in producing knowledge on Indigenous food and livelihood systems. The narrative for working together states that,

“FAO respects and values indigenous peoples' knowledge. This includes ensuring the exchange of traditional and academic knowledge, ensuring the transfer of data, and mutual, cross-cultural respect. In particular, it promotes the co-creation of knowledge, blending scientific and indigenous peoples' knowledge systems, considering both with the same level of respect and consideration”  
(Food and Agriculture Organization of the United Nations, 2024).

The UNDP IPs Policy addresses issues of engagement with IPs in programmes and projects. UNDP Social and Environmental Standard 6 on IPs focuses on processes of project screening, assessment, and management. The UNDP also incorporates the “right to development” approach and seeks to foster the participation of IPs into development processes and the incorporation of IPs' perspectives in development planning and decision-making. The UNDP human rights policy recognizes the rights of distinct peoples living in distinct regions to self-determined development and control of ancestral lands. Through their Indigenous knowledge programme, the UNDP also promotes Indigenous knowledge through targeted capacity-building and direct support for projects formulated and implemented by IPs and their organizations. The UNDP IPs Policy considers IPs' collective rights to knowledge and resources and the need for prior informed consent for their use. This consent is not just required from governments but from IPs' communities.

## E. DISCUSSION OF FINDINGS FROM THE BENCHMARKING

### 1. KEY ASPECTS OF THE GCF IPs POLICY

The GCF IPs Policy clearly adheres to many of the substantive areas under UNDRIP and ILO Convention 169. Table A - 3.6 shows where the GCF IPs Policy directly addresses different UNDRIP articles and where no direct reference is found. For example, at the general policy level, the GCF IPs Policy addresses the rights to the full enjoyment, as a collective or as individuals, of all human rights and fundamental freedoms and to be free from any kind of discrimination in the exercise of their rights, in particular that based on their Indigenous origin or identity. Rights and special needs of Indigenous elders, women, youth, children, and persons with disabilities are acknowledged. The intersectional aspects of IPs' rights are recognized in regard of consultation and compensation. Also recognized are the need to foster the meaningful inclusion and participation of Indigenous women and other marginalized groups, such as persons with disabilities.

However, the onus for how well the GCF IPs Policy is implemented is on NDAs, implementing entities and EEs, and how they integrate the GCF IPs Policy into activities. GCF enforcement of compliance requires careful assessment through review and thorough assessment of IPPs and IPPFs. The secondary due diligence role played by the GCF and the stringency of implementation are important. If foundational (rights and status) standards are not followed, nor are operational

standards seen as compliance issues at the project proposal stage, then adherence with standards will not happen at project origination and implementation/monitoring stages.

Articles 3, 4 and 5 of the UNDRIP (United Nations Office of the High Commissioner for Human Rights, 2007) refer to important components of IPs' rights to self-determination. While there is overarching alignment to this in the GCF IPs Policy, there is no explanation of how IPs' self-government and autonomy could actually be contributed to and supported through GCF-funded climate action. Similarly, IPs' customary institutions are not referred to in the GCF IPs Policy in terms of self-determination of activities for climate action. Rather, the emphasis is on FPIC as a means of consultation, but not an instrument for self-determined consent. In addition, the IPs' right to participate in decision-making is only implicitly recognized, rather than required as a standard, in the provisions of the GCF IPs Policy. Hence, the GCF IPs Policy is found to be weak on foundational standards related to rights and status. In addition, the adherence to operational standards leans towards consultation rather than consent, and remedy rather than protect and respect. There is a significant gap in the GCF IPs Policy related to the sustainability of IPs' knowledge and practice generally and specifically in relation to climate action. For instance, support to establish and control their own educational systems and institutions is not explicitly referred to in the GCF IPs Policy.

With regard to the right to the conservation and protection of the environment, the GCF IPs Policy refers to "develop and control". This discrepancy is important given the early statement in the GCF IPs Policy's introduction that the "economic, social and legal status of indigenous peoples frequently limit their capacity to defend their rights to, and interests in, land, territories and natural and cultural resources, and may restrict their ability to participate in and benefit from development initiatives and climate change actions" (Green Climate Fund, 2018a, p.1). "Develop and control" is ambiguous in terms of what it refers to and the term begs the questions of what direction or type of development is being taken forward and who is in the driving seat and able to control it.

UNDRIP refers directly in article 39 to IPs' "right to have access to financial and technical assistance from States and through international cooperation, for the enjoyment of the rights contained in this Declaration" (United Nations Office of the High Commissioner for Human Rights, 2007). This implies that financing needs to be tailored to IPs' needs and priorities. Targeted support to IPs is important where equity of benefit-sharing is in doubt to ensure adherence to the right to have access to financial and technical assistance through international cooperation.

The GCF IPs Policy largely adheres to ILO Convention 169 provisions in terms of IPs' self-identification, the state government's responsibilities for special measures, IPs' human rights and no discrimination, IPs' cultural safeguarding and protection, the need for meaningful consultation, and respect of customary practices.

As set out previously in section D.2.b, adherence is absent or weak in some areas. Of these, the most significant include establishing means whereby IPs freely participate at all levels of decision-making. The purpose of the GCF IPs Policy is stated as assisting GCF in incorporating considerations related to IPs into its decision-making while working towards the goals of climate change mitigation and adaptation. The ILO Convention 169 is more much explicit and indicates applied provisions for IPs' decisions on their development.

The cultural importance of lands and rights of ownership are recognized in the GCF IPs Policy, but usufruct rights, including access to common land and passage for mobility, are not directly addressed. Nor is the protection of land rights transmission. In addition, contacts and cross-border cooperation among IPs' communities is not addressed. All of these components are vital for pastoral and nomadic IPs.

## 2. ISSUES RELATED TO THE ASSESSMENT CRITERIA

The relevance, effectiveness, efficiency, impact and sustainability of GCF-supported projects and programmes where IPs are involved or affected will be related to, if not determined by, the ways that IPs and IPOs are engaged across the investment cycle. This is not just the case where IPs are protagonists and participants in projects and programmes, but also where IPs and IPOs, and their territories, lands and natural resources, are affected by projects and programmes. Good IPs engagement is a necessary precursor of relevant, effective, efficient, impactful and sustainable projects and programmes. And good engagement requires that the GCF IPs Policy is strong on both operational (terms and procedures for engagement) and foundational standards related to rights and status – self-determination and self-identification. So, in effect, achieving high level of GCF's own evaluation criteria in IPs-related projects and programmes requires strong and effective policy. The benchmarking reveals that the GCF IPs Policy has gaps in relation to standards and an emphasis on procedural rather than rights and status aspects.

GCF coherence with other multilateral entities in climate-finance delivery is important for achieving high level of the evaluation criteria. Shared high-standard engagement with IPs and IPOs by multilateral entities is part of this coherence. The fact that other multilateral entities have recently updated their IPs-related policies and procedures (such as FAO, IFAD and AfDB) means that coherence by GCF may be lagging behind.

Gender equity and social inclusion are critically important in engaging with IPs and IPOs. Being Indigenous is part of individuals' and groups' intersectionality and can be a determinant of climate vulnerability. The alignment of gender equity and social inclusion measures with IPs' and IPOs' engagement is crucial.

Country ownership of projects and programmes is a success criterion of the highest order for the GCF. It is also mandated by decisions and the agreement of Parties to the UNFCCC.<sup>10</sup> The benchmarking process has revealed how the AfDB ISS and IFAD IPs Policy frame and address the critical issues of how country-level recognition and appropriation of IPs' rights affect the implementation of climate action investments. The GCF IPs Policy needs to work across countries with different national policies and norms as regards to IPs and IPOs. AfDB, by using regionally appropriate terminology in reference to groups qualified as IPs under national legislation, charts a pragmatic course to account for differing national policy frameworks across member African countries. Meanwhile, the IFAD IPs Policy explicitly supports the right to development in dialogue with governments. The IFAD Policy framework articulates support for IPs' participation in defining and implementing policies and programmes. It also describes actions that promote territorial management and IPs' economies that are consistent with preserving and conserving environments. IFAD explicitly supports adaptation strategies rooted in IPs' ancestral knowledge and practices.

In many circumstances, the engagement of IPs and IPOs in the diagnosis and design of climate risks, vulnerabilities and action is a vital way to assure innovativeness. The knowledge and experience of IPs and IPOs can fuel innovativeness and ensure the relevance and effectiveness of projects and programmes. The GCF IPs Policy does flag terms of engagement (such as FPIC) and meaningful consultation from a largely "protect, respect and remedy" perspective (rather than a rights and status perspective) for IPs' involvement in climate action to drive innovation. However, the gaps in the GCF IPs Policy on IPs' knowledge curation and knowledge systems management mean that IPs' contribution to innovative climate action is likely to inadequately support innovation through combined scientific and IPs' knowledge. This gap is pointed out in interviews with LCIPP FWG.

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<sup>10</sup> Decision 6/CP.26; decision 5/CP.24.

IPs' involvement in MEL is crucial to the role and contributions of engagement with IPs and IPOs in the replication and scalability of projects and programmes. The GCF IPs Policy and operational guidelines do not emphasize this point and AEs and other implementing entities may not give this aspect due attention. Negative results can lead to failures in the basic protect and respect approach to IPs' rights, causing the need for remedies to be effectively developed and implemented, for example, through grievance mechanisms.

### 3. ENGAGEMENT WITH IPs AND IPOs

GCF supports policy implementation by providing guidelines, documenting and communicating, accreditation, risk management, compliance, receiving and acting upon advice from the IPAG, and through policy review and revision. However, a large part of GCF IPs Policy implementation falls on the AEs and their partners. For a fundamental rights and operational principles-based policy, such stratified and tiered implementation structures can be problematic and difficult to manage well. For instance, quality assurance of key implementation tasks such as managing FPIC, ensuring gender equality and social inclusion, risk management, multi-stakeholder consultation, and managing grievance mechanisms are all both central to the GCF IPs Policy and technically difficult to implement. So, the quality and effectiveness of the IPPs and/or IPPFs are key.

### 4. ADDRESSING SELF-DETERMINATION AND CONSENT

FPIC is explained in the ILO Convention 169, and UNDRIP takes the methodology further. It is now a quintessential principle for engagement with IPs. As Food and Agriculture Organization of the United Nations (2024) stated, "FPIC protects IPs' right to participation, consultation, and eventual agreement or not, prior to the beginning of any activity affecting their livelihoods. Once given, consent can be withdrawn at any point after the activity commences."

FPIC mechanism is central to IPs' right to self-determination and their individual and collective rights to choose the political status they prefer and to follow their choice of economic, social, and cultural development. This accords with UNDRIP article 3 and is referred to in articles 10, 11, 19, 28, 29 and 32 (United Nations Office of the High Commissioner for Human Rights, 2007).

FPIC is required if GCF-funded activities may have following effects: impacts on lands and natural resources subject to traditional ownership or under customary use; relocation of IPs from lands and natural resources subject to traditional ownership or under customary use; impacts on cultural heritage;<sup>11</sup> and use of cultural heritage, including knowledge, innovations, or practices of IPs for commercial purposes. FPIC is defined in the GCF IPs Policy as

"an iterative process, requiring indigenous peoples' consent before a proposal for GCF financing is considered by the Board, on the basis of their own independent deliberations and decision-making process, based on adequate information to be provided in a timely manner, in a culturally appropriate manner, in a local language that is understood by them, and through a process of transparent and inclusive consultations, including with women and youth, and free of coercion or intimidation"  
(Green Climate Fund, 2018a, p.14).

<sup>11</sup> Essential to the identity, cultural, ceremonial or spiritual aspects of IPs' lives, including the practice of traditional livelihoods and natural areas with cultural or spiritual values such as sacred groves, sacred bodies of water and waterways, sacred trees and sacred rocks.

The GCF considers that FPIC may be achieved even when individuals or groups within or among affected IPs explicitly disagree.

## 5. KNOWLEDGE AND THE CLIMATE RATIONALE

As stated in the GCF IPs Policy operational guidelines, the policy frames how GCF ensures IPs benefit from GCF activities and recognizes the contributions of IPs in achieving transformative climate action, including through their knowledge. The same GCF IPs Policy operational guidelines refer to IPs' knowledge as "intangible cultural heritage" (Green Climate Fund, 2019a).

Where GCF-funded activities use IPs' knowledge, innovations, or practices, the policy requires that AEs and EEs should investigate whether the Indigenous cultural heritage is held individually or collectively prior to entering into any agreements with the local Indigenous holder(s) of the cultural heritage; obtain the FPIC of the Indigenous cultural heritage holder(s) for its use; and share the benefits accruing from such use as appropriate with the IPs.

The introduction to the GCF 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".<sup>12</sup> Neither the GCF IPs Policy nor the operational guidelines are explicit on how this will be done.

The 2022 IFAD IPs Policy recognizes that information dissemination, knowledge generation and management, capacity-building and peer support are critical for IPs and their knowledge systems to contribute to sustainable development – including climate action. IFAD is investing in digital knowledge curation and e-learning. Partnering on related activities is happening among FAO, the Inter-Agency Support Group on Indigenous Issues (United Nations, Department of Economic and Social Affairs, n.d.), the ILO International Training Centre and regional IPOs. Internal knowledge-management investments in IPs' engagement, such as information-sharing, shared learning exercises, technical/thematic groups, portfolio reviews, and evaluation, are needed for organizations that aspire to improve engagement with IPs.

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<sup>12</sup> Decision 4/CP.20, para. 5(b).



## F. EVIDENCE TABLES

*Table A - 3.4. Evidence table 1: Standards, inquiry areas and explanations for the benchmarking process*

STANDARDS	INQUIRY AREAS AND BENCHMARKING COMPARISONS	DEFINITIONS AND KEY POINTS RELEVANT TO THE GCF IPs POLICY EVALUATION
Adherence with international policy related to IPs <sup>13</sup>	<p>International policies where adherence by GCF and other organizations will be compared:</p> <ul style="list-style-type: none"> <li>• UNDRIP<sup>14</sup></li> <li>• ILO Convention 169<sup>15</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Legally non-binding resolution passed by the United Nations in 2007 that delineates and defines the individual and collective rights of IPs to self-determination; to protect their culture through practices, languages, education, media and religion, including intellectual property; to their own type of governance and to economic development; to health; to protection of sub-groups (such as the elderly, women, children); to land rights; and environmental issues.</li> <li>• Once ratified by a state it acts to protect IPs' rights of survival and integrity, including land, language and religion.</li> </ul>
Relevant non-IPs specific guidelines and principles	<ul style="list-style-type: none"> <li>• United Nations Guiding Principles on Business and Human Rights (GPBHR)<sup>16</sup></li> <li>• Equator Principles<sup>17</sup></li> </ul>	<ul style="list-style-type: none"> <li>• The GPBHR allows the implementation of the “protect, respect and remedy” framework. They represent a global standard for preventing and addressing the risk of adverse impacts on human rights involving business activity, and they provide the internationally accepted framework for enhancing standards and practices with regard to business and human rights. The framework comprises three core principles: the State duty to protect against human rights abuses by third parties, including business; the corporate responsibility to respect human rights; and the need for more effective access to remedies.</li> </ul>

<sup>13</sup> There is no universally accepted definition of “Indigenous Peoples”. IPs may be referred to in different countries by such terms as “Indigenous ethnic minorities”, “aboriginals”, “hill tribes”, “minority nationalities”, “scheduled tribes”, “first nations” or “tribal groups”. In the IFC Performance Standard 7, the term “Indigenous Peoples” is used in a generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees: self-identification as members of a distinct Indigenous cultural group and recognition of this identity by others; collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; customary cultural, economic, social or political institutions that are separate from those of the mainstream society or culture; or a distinct language or dialect, often different from the official language or languages of the country or region in which they reside. United Nations Human Rights conventions, such as UNDRIP, form the core of international instruments that provide the rights framework for members of the world's IPs. In addition, some countries have passed legislation or ratified other international or regional conventions for the protection of IPs, that must be taken account of in their respective jurisdictions. See Equator Principles (2021).

<sup>14</sup> See United Nations Office of the High Commissioner for Human Rights (2007).

<sup>15</sup> See International Labour Organization (2007).

<sup>16</sup> See United Nations Office of the High Commissioner for Human Rights (2012).

<sup>17</sup> See Equator Principles (2021).

STANDARDS	INQUIRY AREAS AND BENCHMARKING COMPARISONS	DEFINITIONS AND KEY POINTS RELEVANT TO THE GCF IPS POLICY EVALUATION
Adherence to decisions and agreements related to IPs under the UNFCCC	<p>UNFCCC decisions and agreements where adherence will be assessed:<sup>19</sup></p> <ul style="list-style-type: none"> <li>• Decision 1/CP.21: Decision to adopt the Paris Agreement<sup>20</sup></li> <li>• Decision 2/CP.23: LCIPP<sup>21</sup></li> <li>• SBSTA 48 conclusion<sup>22</sup></li> <li>• Decision 2/CP.24<sup>23</sup></li> <li>• SBSTA 51 conclusion<sup>24</sup></li> </ul>	<ul style="list-style-type: none"> <li>• The Equator Principles apply to financial products supporting new projects, including finance advisory services, project finance, project-related corporate loans, bridge loans, project-related refinance and acquisition finance. The 10 principles cover: review and categorization; environmental and social assessment; applicable environmental and social standards; ESMS and Equator Principles action plan; stakeholder engagement;<sup>18</sup> grievance mechanism; independent review; covenants; independent monitoring and reporting; and reporting and transparency.</li> <li>• Actions taken to address climate change should respect, promote and consider respective obligations on human rights, including IPs. Recognizes the need to strengthen knowledge, technologies, practices and efforts of local communities and IPs related to addressing and responding to climate change, and establishes a platform for the exchange of experiences and sharing of best practices on mitigation and adaptation. Adaptation action should be based on and guided by the best available science and, as appropriate, traditional knowledge, knowledge of IPs and local knowledge systems.</li> <li>• Decision 2/CP.23 sets the purposes of the platform to strengthen the knowledge, technologies, practices and efforts of local communities and IPs related to</li> </ul>

<sup>18</sup> Equator Principles financial institutions recognize that IPs may represent vulnerable segments of project-affected communities. All projects affecting IPs will be subject to a process of informed consultation and participation (ICP) and will need to comply with the rights and protections for IPs contained in relevant national law, including those laws implementing host country obligations under international law. IFC Performance Standard 7 paragraphs 13–17 detail the special circumstances that require the FPIC of affected IPs, which include any of the following: projects with impacts on lands and natural resources subject to traditional ownership or under the customary use of IPs; projects requiring the relocation of IPs from lands and natural resources subject to traditional ownership or under customary use; projects with significant impacts on critical cultural heritage essential to the identity of IPs; or projects using their cultural heritage for commercial purposes. Globally for projects that meet these special circumstances, EPFIs will require a qualified independent consultant to evaluate the consultation process with IPs, and the outcomes of that process, against the requirements of host country laws and IFC Performance Standard 7. Where stakeholder engagement, including with IPs, is the responsibility of the host government, EPFIs require the client to collaborate with the responsible government agency during the planning, implementation and monitoring of activities, to the extent permitted by the agency, to achieve outcomes that are consistent with IFC Performance Standard 7.

<sup>19</sup> The LCIPP web portal provides an updated table of relevant decisions and conclusions on the climate change negotiation agenda under the UNFCCC. Available at <https://lcipp.unfccc.int/lcipp-background/relevant-decisions-and-conclusions>

<sup>20</sup> Decision 1/CP.21 (United Nations Framework Convention on Climate Change, 2016).

<sup>21</sup> Draft decision -/CP.29 Local Communities and Indigenous Peoples Platform as contained in UNFCCC document titled “DRAFT TEXT on SBSTA 60 agenda item 7 Local Communities and Indigenous Peoples Platform Version 4/6/2024 20:30” (United Nations Framework Convention on Climate Change, 2024a).

<sup>22</sup> Meeting report FCCC/SBSTA/2018/4 (United Nations Framework Convention on Climate Change, 2018b).

<sup>23</sup> Meeting report FCCC/CP/2018/10/Add.1 (United Nations Framework Convention on Climate Change, 2019).

<sup>24</sup> Meeting report FCCC/SBSTA/2019/5 (United Nations Framework Convention on Climate Change, 2020).



STANDARDS	INQUIRY AREAS AND BENCHMARKING COMPARISONS	DEFINITIONS AND KEY POINTS RELEVANT TO THE GCF IPS POLICY EVALUATION
	<ul style="list-style-type: none"> <li>• Decision 16/CP.26<sup>25</sup></li> <li>• Draft decision -/CP.26 (Report of the Green Climate Fund to the Conference of the Parties and guidance to the Green Climate Fund)<sup>26</sup></li> <li>• Draft decision -/CP.29<sup>27</sup></li> </ul>	<p>addressing and responding to climate change; to facilitate the exchange of experience and the sharing of best practices and lessons learned related to mitigation and adaptation in a holistic and integrated manner; to enhance the engagement of local communities and IPs in the UNFCCC process; to follow principles proposed by IPOs; full and effective participation of IPs; equal status of IPs and Parties, including in leadership roles; and self-selection of IPs' representatives in accordance with IPs' own procedures.</p> <ul style="list-style-type: none"> <li>• The Subsidiary Body for Scientific and Technological Advice (SBSTA) noted the importance of Indigenous and traditional knowledge in relevant aspects of scientific data and research and in communication at the science-policy interface and the functions of the LCIPP.</li> <li>• Decides to establish the LCIPP FWG with a workplan, including collaboration with other bodies under and outside the UNFCCC.</li> <li>• SBSTA reaffirms the importance of enhancing the coherence between the LCIPP FWG and relevant bodies under and outside the Convention consistently with their relevant mandates.</li> <li>• Invites relevant bodies under the UNFCCC to take into account the recommendations of the LCIPP FWG to the SBSTA on the engagement and input of IPs and local communities across the UNFCCC process. Decides to continue the mandate of the LCIPP FWG.</li> <li>• Welcomes progress reported by GCF Board, including actions taken. Encourages the Board to further clarify the role of data and information from, inter alia, the Intergovernmental Panel on Climate Change (IPCC) and traditional, local and Indigenous knowledge and practices in the assessment of concept notes, project preparation of funding applications and FPs; urges the Board to prioritize closing the policy gaps as a matter of urgency; and encourages the Board to continue the integration of gender considerations into its activities, including through its Gender Policy and by promoting gender balance across the structures</li> </ul>

<sup>25</sup> Decision 16/CP.26, in FCCC/CP/2021/12/Add.2 (United Nations Framework Convention on Climate Change, 2022).

<sup>26</sup> Draft decision -/CP.26 as contained in FCCC/CP/2021/L.6 titled "Conference of the Parties twenty-sixth session Glasgow, 31 October to 12 November 2021. Agenda item 8(c) Matters relating to finance. Draft decision -/CP.26. Report of the Green Climate Fund to the Conference of the Parties and guidance to the Green Climate Fund (for 2020 and 2021)". See United Nations Framework Convention on Climate Change (2021).

<sup>27</sup> Draft decision -/CP.29 as contained in FCCC/SBSTA/2024/L.1 titled "Local Communities and Indigenous Peoples Platform. Draft decision -/CP.29. Recommendation of the Subsidiary Body for Scientific and Technological Advice". See United Nations Framework Convention on Climate Change (2024b).

STANDARDS	INQUIRY AREAS AND BENCHMARKING COMPARISONS	DEFINITIONS AND KEY POINTS RELEVANT TO THE GCF IPS POLICY EVALUATION
		<p>of the GCF.</p> <ul style="list-style-type: none"> <li>• Encourages Parties, relevant constituted bodies and representatives of work programmes under the Convention and the Paris Agreement and other stakeholders to actively collaborate with the LCIPP FWG.</li> </ul>
Institutional policies and practices on IPs engagement	<p>Policy and practice areas where comparisons of GCF and other organizations' performance will be made:</p> <ul style="list-style-type: none"> <li>• FPIC<sup>28</sup></li> <li>• Consultation</li> <li>• Participation</li> <li>• Safeguarding</li> <li>• Grievance and redress</li> <li>• Implementation</li> <li>• Capacity development</li> <li>• IPOs' accreditation</li> <li>• IPOs' access to funding</li> <li>• IPs' advisory groups</li> <li>• IPs' participation in M&amp;E</li> </ul>	<ul style="list-style-type: none"> <li>• UNDRIP Article 10: "Indigenous peoples shall not be forcibly removed from their lands or territories. No relocation shall take place without the free, prior and informed consent of the indigenous peoples concerned and after agreement on just and fair compensation and, where possible, with the option of return" (United Nations Office of the High Commissioner for Human Rights, 2007). ILO Convention 169 states, "Consult the peoples concerned, through appropriate procedures and in particular through their representative institutions, whenever consideration is being given to legislative or administrative measures which may affect them directly" (International Labour Organization, 2007).</li> <li>• ILO Convention 169 provides rules for consultation with IPs in regard of peoples concerned, appropriate procedures and representative institutions.</li> <li>• ILO Convention 169 provides key elements of participation, including right of involvement in actions at every step from design to implementation and evaluation, at all levels of decision-making and through IPs' own traditional or representative bodies.</li> <li>• Article 4 of ILO Convention 169 provides for special measures for safeguarding the persons, institutions, property, labour, cultures and environment of the peoples concerned.</li> <li>• The Compliance Advisor Ombudsman (related to the World Bank Group, IFC and the Multilateral Investment Guarantee Agency [MIGA]) provides tools and</li> </ul>

<sup>28</sup> FAO defines FPIC as: **Free** – there is no manipulation or coercion of the IPs and that the process is self-directed by those affected by the project; **Prior** – which implies that consent is sought sufficiently in advance of any activities being either commenced or authorized, and time for the consultation process to occur must be guaranteed by the relative agents; **Informed** – which suggests that the relevant IPs receive satisfactory information on the key points of the project, such as the nature, size, pace, reversibility and scope of the project as well as the reasons for it and its duration. "Informed" is the most difficult term of the four, as different groups may find certain information more relevant. The IPs should also have access to the primary reports on the economic, environmental and cultural impacts that the project will have. The language that is used must be understood by the IPs; **Consent** is not defined but is granted or withheld after a process that involves consultation and participation. However, mere consultation by itself is not a substitute for actual consent. The United Nations Working Group on Business and Human Rights notes that IPs "should determine autonomously how they define and establish consent". See Food and Agriculture Organization of the United Nations (2016) and United Nations (2013).

STANDARDS	INQUIRY AREAS AND BENCHMARKING COMPARISONS	DEFINITIONS AND KEY POINTS RELEVANT TO THE GCF IPS POLICY EVALUATION
		<p>resources for implementing and assessing grievance mechanisms.<sup>29</sup></p> <ul style="list-style-type: none"> <li>• IPs' involvement in implementation of developmental actions is guided by Article 7.1 of ILO Convention 169.</li> <li>• Capacity development is seen as a two-way street. IPs and IPOs need the capacities required to engage with climate-finance providers and their intermediaries. Also, staff of the climate funds and agencies need understanding and capacity to be able to engage with IPs, IPOs and IPs' issues. This is fully recognized in the United Nations Common Learning Package training on the Human Rights Approach.<sup>30</sup></li> </ul>
Institutional policies and practices on IPs knowledge management	<ul style="list-style-type: none"> <li>• Knowledge dialogue</li> <li>• Knowledge-sharing</li> </ul>	<ul style="list-style-type: none"> <li>• The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) develops methodological guidance for recognizing and working with Indigenous and local knowledge.<sup>31</sup> Principles include equality of all participants and absence of coercive influence; listening with empathy and seeking to understand each other's viewpoints; accurate and empathetic communication; bringing assumptions into the open.</li> <li>• The IPBES guidance includes knowledge-sharing, FPIC, experts and gap filling.</li> </ul>
ESS	Aspects of the IFC ESS where comparisons of GCF and other organizations' performance will be made.	IFC ESS Performance Standard 7 focuses on IPs. <sup>32</sup>

Source: IIED evaluation team

<sup>29</sup> See Office of the Compliance Advisor Ombudsman (2016).

<sup>30</sup> See United Nations (2010).

<sup>31</sup> See Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (2022).

<sup>32</sup> International Finance Corporation (2012).

**Table A - 3.5. Evidence table 2: The importance of components of the UNDRIP to GCF IPs engagement**

UNDRIP FOUNDATIONAL STANDARDS	IMPORTANCE AND IMPLICATIONS FOR ENGAGEMENT AND PARTICIPATION	IMPORTANCE AND IMPLICATIONS FOR INTEGRATION OF KNOWLEDGE AND EXPERIENCE	IMPORTANCE FOR RELEVANCE, EFFECTIVENESS, EFFICIENCY, IMPACT AND SUSTAINABILITY	IMPORTANCE FOR GESI, COUNTRY OWNERSHIP, INNOVATIVENESS, REPLICATION AND SCALABILITY, AND UNEXPECTED RESULTS
<i>Colour coding</i>	<i>Crucial</i>			
	<i>Significant</i>			
	<i>Relevant</i>			
Article 1: Right to the full enjoyment, as a collective or as individuals, of all human rights and fundamental freedoms.	Engagement with IPs as citizens individually and/or in groups.			
Article 2: Right to be free from any kind of discrimination, in the exercise of their rights, in particular that based on their Indigenous origin or identity.	Basis for inclusive engagement and free participation as IPs.			Basis for intersectional approach for engagement with and participation by all IPs of different identifies.
Article 3: Peoples freely determine their political status and freely pursue their economic, social and cultural development. <sup>33</sup>	Status for engagement defined by IPs as individuals.			
Article 4: Right to autonomy or self-government in matters relating to their internal and local affairs, as well as ways and means for financing their autonomous functions.	Engagement in climate action as IPs groups and access to finance. Recognition by State a prerequisite.			
Article 5: Right to maintain and strengthen their distinct political, legal, economic, social and cultural institutions, while retaining their right to participate fully, if they so choose, in the political, economic, social and cultural life of the State.	IPs and IPOs able to define own climate action. Contingent upon political choices of the State.			

<sup>33</sup> As set out in the Charter of the United Nations (1945); the International Covenant on Economic, Social and Cultural Rights (United Nations Office of the High Commissioner for Human Rights, 1966a); the International Covenant on Civil and Political Rights (United Nations Office of the High Commissioner for Human Rights, 1966b); and the Vienna Declaration and Programme of Action (United Nations Office of the High Commissioner for Human Rights, 1993).

UNDRIP FOUNDATIONAL STANDARDS	IMPORTANCE AND IMPLICATIONS FOR ENGAGEMENT AND PARTICIPATION	IMPORTANCE AND IMPLICATIONS FOR INTEGRATION OF KNOWLEDGE AND EXPERIENCE	IMPORTANCE FOR RELEVANCE, EFFECTIVENESS, EFFICIENCY, IMPACT AND SUSTAINABILITY	IMPORTANCE FOR GESI, COUNTRY OWNERSHIP, INNOVATIVENESS, REPLICATION AND SCALABILITY, AND UNEXPECTED RESULTS
Article 6: Right to a nationality.	Recognition by State a prerequisite.			
Article 7: Rights to life, physical and mental integrity, liberty and security of person. Collective right to live in freedom, peace and security as distinct peoples and shall not be subjected to any act of genocide or any other act of violence, including forcibly removing children of the group to another group.	Contingent upon political choices of the State.			
Article 8: Right not to be subjected to forced assimilation or destruction of their culture. <sup>34</sup> States shall provide effective mechanisms for prevention and redress.	Climate action must not threaten cultural assimilation or destruction.			Contingent upon political choices of the State.
Article 9: Right to belong to an Indigenous community or nation, in accordance with the traditions and customs of the community or nation concerned.		Traditions and customs respected as part of knowledge systems relevant to climate action.		
Article 10: Right to not be forcibly removed from their lands or territories. No relocation shall take place without the free, prior and informed consent of the IPs concerned and after agreement on just and fair compensation and, where possible, with the option of return.	Basis for FPIC an integral part of climate action planning.			
Article 11: Right to practise and revitalize their cultural traditions and customs.		Traditions and customs respected as part of knowledge systems		

<sup>34</sup> As per Article 8, UNDRIP, this includes “any action which has the aim or effect of depriving them of their integrity as distinct peoples, or of their cultural values or ethnic identities; [...] dispossessing them of their lands, territories or resources; [...] forced population transfer which has the aim or effect of violating or undermining any of their rights; [...] forced assimilation or integration; [...] propaganda designed to promote or incite racial or ethnic discrimination directed against them”. (United Nations Office of the High Commissioner for Human Rights, 2007)

UNDRIP FOUNDATIONAL STANDARDS	IMPORTANCE AND IMPLICATIONS FOR ENGAGEMENT AND PARTICIPATION	IMPORTANCE AND IMPLICATIONS FOR INTEGRATION OF KNOWLEDGE AND EXPERIENCE	IMPORTANCE FOR RELEVANCE, EFFECTIVENESS, EFFICIENCY, IMPACT AND SUSTAINABILITY	IMPORTANCE FOR GESI, COUNTRY OWNERSHIP, INNOVATIVENESS, REPLICATION AND SCALABILITY, AND UNEXPECTED RESULTS
		relevant to climate action.		
Article 12: Right to manifest, practice, develop and teach their spiritual and religious traditions, customs and ceremonies.	Climate action involving IPs needs to integrate/respect cultural	practices.	Relevance to IPs practices.	
Article 13: Right to revitalize, use, develop and transmit to future generations their histories, languages, oral traditions, philosophies, writing systems and literatures, and to designate and retain their own names for communities, places and persons.		Key to the respect for and integration of IPs knowledge in climate action.		
Article 14: Right to establish and control their educational systems and institutions.		Relevant to IPs' climate knowledge.		
Article 15: Right to the dignity and diversity of their cultures, traditions, histories and aspirations. <sup>35</sup>	Dignity and diversity respected in engagement.			
Article 16: Right to establish their own media in their own languages and to have access to all forms of non-Indigenous media.		Relevant to IPs' climate knowledge.		
Article 17: Right to enjoy fully all rights established under applicable international and domestic labour law.	Participation in climate action commensurate with labour laws (including productive work in adaptive social protection).			Participation in climate action commensurate with labour laws (including productive work in adaptive social protection).
Article 18: Right to participate in decision-making in matters	Diagnosis, planning,	Integration of IPs'		

<sup>35</sup> Article 15, UNDRIP, says "States shall take effective measures, in consultation and cooperation with the indigenous peoples concerned, to combat prejudice and eliminate discrimination and to promote tolerance, understanding and good relations among indigenous peoples and all other segments of society." (United Nations Office of the High Commissioner for Human Rights, 2007)

UNDRIP FOUNDATIONAL STANDARDS	IMPORTANCE AND IMPLICATIONS FOR ENGAGEMENT AND PARTICIPATION	IMPORTANCE AND IMPLICATIONS FOR INTEGRATION OF KNOWLEDGE AND EXPERIENCE	IMPORTANCE FOR RELEVANCE, EFFECTIVENESS, EFFICIENCY, IMPACT AND SUSTAINABILITY	IMPORTANCE FOR GESI, COUNTRY OWNERSHIP, INNOVATIVENESS, REPLICATION AND SCALABILITY, AND UNEXPECTED RESULTS
which would affect their rights, through representatives chosen by themselves in accordance with their own procedures, as well as to maintain and develop their own Indigenous decision-making institutions.	implementation and evaluation of climate action.	knowledge and experience of climate change.		
Article 19: Free, prior and informed consent before adopting and implementing legislative or administrative measures that may affect them.	Basis for FPIC in climate action.			
Article 20: Right to maintain and develop their political, economic and social systems or institutions, to be secure in the enjoyment of their own means of subsistence and development, and to engage freely in all their traditional and other economic activities.	Social inclusion and respect for IPs' systems and institutions important for avoiding social vulnerability and consequently climate vulnerability.			Contingent upon political choices of the State.
Article 21: Right, without discrimination, to the improvement of their economic and social conditions. <sup>36</sup>	Draws attention to intersectional aspects of right to development as basis for non-discriminatory climate action.			Rights and special needs of Indigenous elders, women, youth, children and persons with disabilities.
Article 22: Rights and special needs of Indigenous elders, women, youth, children and persons with disabilities. <sup>37</sup>	As above.			As above.

<sup>36</sup> Article 21, UNDRIP, says "States shall take effective measures and, where appropriate, special measures to ensure continuing improvement of their economic and social conditions. Particular attention shall be paid to the rights and special needs of indigenous elders, women, youth, children and persons with disabilities." (United Nations Office of the High Commissioner for Human Rights, 2007)

<sup>37</sup> Article 22, UNDRIP, says "States shall take measures, in conjunction with indigenous peoples, to ensure that indigenous women and children enjoy the full protection and guarantees against all forms of violence and discrimination." (United Nations Office of the High Commissioner for Human Rights, 2007)



UNDRIP FOUNDATIONAL STANDARDS	IMPORTANCE AND IMPLICATIONS FOR ENGAGEMENT AND PARTICIPATION	IMPORTANCE AND IMPLICATIONS FOR INTEGRATION OF KNOWLEDGE AND EXPERIENCE	IMPORTANCE FOR RELEVANCE, EFFECTIVENESS, EFFICIENCY, IMPACT AND SUSTAINABILITY	IMPORTANCE FOR GESI, COUNTRY OWNERSHIP, INNOVATIVENESS, REPLICATION AND SCALABILITY, AND UNEXPECTED RESULTS
Article 23: Right to determine and develop priorities and strategies for exercising their right to development.	Participation in climate action design. Climate action for futureproofing is increasingly integral to the right to development.			
Article 24: Right to their traditional medicines and to maintain their health practices, including the conservation of their vital medicinal plants, animals and minerals.		This is an important component of IPs' knowledge related to climate action.		
Article 25: Right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.	IPs' relationship to the stewardship of the environment for coming generations. Core principle for leadership of climate action by IPs.		The relevance and effectiveness of climate action by IPs mediated by this right.	
Article 26: Right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired. <sup>38</sup>	Frames engagement with IPs where climate action is located on their lands.			Contingent upon political choices of the State.
Article 27: Fair, independent, impartial, open and transparent process, giving due recognition to IPs' laws, traditions, customs and land tenure systems, to recognize and adjudicate the rights of IPs pertaining to their lands, territories and resources, including those which were traditionally owned or otherwise occupied or used.	Frames engagement with IPs where climate action located on their lands.			Contingent upon political choices of the State.

<sup>38</sup> Article 26, UNDRIP, says "Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired. States shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned." (United Nations Office of the High Commissioner for Human Rights, 2007)

UNDRIP FOUNDATIONAL STANDARDS	IMPORTANCE AND IMPLICATIONS FOR ENGAGEMENT AND PARTICIPATION	IMPORTANCE AND IMPLICATIONS FOR INTEGRATION OF KNOWLEDGE AND EXPERIENCE	IMPORTANCE FOR RELEVANCE, EFFECTIVENESS, EFFICIENCY, IMPACT AND SUSTAINABILITY	IMPORTANCE FOR GESI, COUNTRY OWNERSHIP, INNOVATIVENESS, REPLICATION AND SCALABILITY, AND UNEXPECTED RESULTS
Article 28: Right to redress for the lands, territories and resources which they have traditionally owned or otherwise occupied or used, and which have been confiscated, taken, occupied, used or damaged without their free, prior and informed consent. <sup>39</sup>	Acknowledges that FPIC fails or is not employed and recognizes that remedy is required.			Contingent upon political choices of the State.
Article 29: Right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources. <sup>40</sup>		A key driver for climate action increasingly required to conserve and protect the environment, land and resources that IPs depend upon.	Effectiveness assessed on the success of climate action for conservation and protection of lands.	
Article 31: Right to maintain, control, protect and develop their cultural heritage, traditional knowledge and traditional cultural expressions, as well as the manifestations of their sciences, technologies and cultures, including human and genetic resources, seeds, medicines, knowledge of the properties of fauna and flora, oral traditions, literatures, designs, sports and traditional games, and visual and performing arts.  Right to maintain, control, protect and develop their intellectual property over such cultural heritage, traditional knowledge and traditional cultural expressions.		Vital for the respect, understanding and integration of IPs' knowledge in climate action.		
Article 32: Right to determine and develop priorities and strategies for the development or use of their lands or	Vital to the design of climate action affecting IPs' lands.		Relevance therefore dependent upon IPs' priorities for climate	

<sup>39</sup> Article 28, UNDRIP, says "Unless otherwise freely agreed upon by the peoples concerned, compensation shall take the form of lands, territories and resources equal in quality, size and legal status or of monetary compensation or other appropriate redress." (United Nations Office of the High Commissioner for Human Rights, 2007)

<sup>40</sup> Article 29, UNDRIP, says "States shall establish and implement assistance programmes for indigenous peoples for such conservation and protection, without discrimination." (United Nations Office of the High Commissioner for Human Rights, 2007)

UNDRIP FOUNDATIONAL STANDARDS	IMPORTANCE AND IMPLICATIONS FOR ENGAGEMENT AND PARTICIPATION	IMPORTANCE AND IMPLICATIONS FOR INTEGRATION OF KNOWLEDGE AND EXPERIENCE	IMPORTANCE FOR RELEVANCE, EFFECTIVENESS, EFFICIENCY, IMPACT AND SUSTAINABILITY	IMPORTANCE FOR GESI, COUNTRY OWNERSHIP, INNOVATIVENESS, REPLICATION AND SCALABILITY, AND UNEXPECTED RESULTS
territories and other resources. <sup>41</sup>			action.	
Article 33: Right to determine their own identity or membership in accordance with their customs and traditions. <sup>42</sup> Right to determine the structures and to select the membership of their institutions in accordance with their own procedures.	Key to identifying who is part of the IPs and the ways and institutions they choose should be engaged with and participate in climate action.			
Article 34: Right to promote, develop and maintain their institutional structures and their distinctive customs, spirituality, traditions, procedures, practices and, in the cases where they exist, juridical systems or customs, in accordance with international human rights standards.	As above.	Vital for the respect, understanding and integration of IPs' knowledge in climate action.		
Article 35: Right to determine the responsibilities of individuals to their communities.	IPs decide how to engage with climate action.			
Article 36: Right to maintain and develop contacts, relations and cooperation, including activities for spiritual, cultural, political, economic and social purposes, with their own members as well as other peoples across borders.	Networking and intergroup linkages as part of engagement and participation in climate action.			

<sup>41</sup> Article 32, UNDRIP, says “States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources. States shall provide effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact.” (United Nations Office of the High Commissioner for Human Rights, 2007)

<sup>42</sup> Article 33, UNDRIP, says “This does not impair the right of indigenous individuals to obtain citizenship of the States in which they live.” (United Nations Office of the High Commissioner for Human Rights, 2007)

UNDRIP FOUNDATIONAL STANDARDS	IMPORTANCE AND IMPLICATIONS FOR ENGAGEMENT AND PARTICIPATION	IMPORTANCE AND IMPLICATIONS FOR INTEGRATION OF KNOWLEDGE AND EXPERIENCE	IMPORTANCE FOR RELEVANCE, EFFECTIVENESS, EFFICIENCY, IMPACT AND SUSTAINABILITY	IMPORTANCE FOR GESI, COUNTRY OWNERSHIP, INNOVATIVENESS, REPLICATION AND SCALABILITY, AND UNEXPECTED RESULTS
Article 37: Right to the recognition, observance and enforcement of treaties, agreements and other constructive arrangements concluded with States or their successors and to have States honour and respect such treaties, agreements and other constructive arrangements.				Contingent upon political choices of the State.
Article 38: States in consultation and cooperation with IPs, shall take the appropriate measures, including legislative measures, to achieve the ends of this Declaration.	Precursor for climate action where public sector and IPs are involved.			
Article 39: Right to have access to financial and technical assistance from States and through international cooperation, for the enjoyment of the rights contained in this Declaration.	IPs' right of direct access to finance for climate action.			
Article 40: Right to access to and prompt decision through just and fair procedures for the resolution of conflicts and disputes with States or other parties.	Grievance mechanisms for climate action.			
Article 41: The organs and specialized agencies of the United Nations system and other intergovernmental organizations shall contribute to the full realization of the provisions of this Declaration through the mobilization, inter alia, of financial cooperation and technical assistance. Ways and means of ensuring participation of IPs on issues affecting them shall be established.	Demands the full alignment of GCF procedures etc. with UNDRIP.			

Source: IIED evaluation team

**Table A - 3.6. Evidence table 3: Benchmarking the GCF IPs Policy against UNDRIP**

UNDRIP	STATEMENT OF THE STANDARD	GCF IPs POLICY	ASSESSMENT OF NARRATIVE
General policy			
Article 1	Right to the full enjoyment, as a collective or as individuals, of all human rights and fundamental freedoms.	Guiding principles of the GCF IPs Policy, para. 22(c): recognizes key international human rights and principles.	Reference and adherence to United Nations GPBHR related to grievance mechanism.
Article 2	Right to be free from any kind of discrimination, in the exercise of their rights, in particular that based on their Indigenous origin or identity.	Definitions, para. 9(m): “meaningful consultation” is free of external manipulation, interference, coercion, discrimination and intimidation.	International Convention on the Elimination of All Forms of Racial Discrimination used to elaborate IPs Policy.
Article 3	Peoples freely determine their political status and freely pursue their economic, social and cultural development. <sup>43</sup>	[No direct reference]	Status recognized as a potential impediment to rights and development. Emphasis on IPs’ full and effective engagement in climate action design, for example, and pursuit of own development.
Article 4	Right to autonomy or self-government in matters relating to their internal and local affairs, as well as ways and means for financing their autonomous functions.	Policy objectives, para. 11(f): To enable and further realize [...] autonomy. Guiding principles, para. 22(h): Respecting the system of self-government, including right to autonomy.	Overarching alignment, but no further indication of how self-government and autonomy could actually be supported.
Article 5	Right to maintain and strengthen their distinct political, legal, economic, social and cultural institutions, while retaining their right to participate fully, if they so choose, in the political, economic, social and cultural life of the State.	[No direct reference]	IPs’ customary institutions referred to in relation to representation and consultation only.
Article 6	Right to a nationality.	[No direct reference]	
Article 7	Rights to life, physical and mental integrity, liberty and security of person. Collective right to live in freedom,	[No direct reference]	

<sup>43</sup> As set out in the Charter of the United Nations (1945); the International Covenant on Economic, Social and Cultural Rights (United Nations Office of the High Commissioner for Human Rights, 1966a); the International Covenant on Civil and Political Rights (United Nations Office of the High Commissioner for Human Rights, 1966b); and the Vienna Declaration and Programme of Action (United Nations Office of the High Commissioner for Human Rights, 1993).

UNDRIP	STATEMENT OF THE STANDARD	GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	peace and security as distinct peoples and shall not be subjected to any act of genocide or any other act of violence, including forcibly removing children of the group to another group.		
Article 8	Right not to be subjected to forced assimilation or destruction of their culture. <sup>44</sup> States shall provide effective mechanisms for prevention and redress.	Scope of application, para. 17: Lost collective attachment to [territory] due to forced severance.	Issues related to assimilation not recognized. But cultural erosion acknowledged.
Article 9	Right to belong to an Indigenous community or nation, in accordance with the traditions and customs of the community or nation concerned.	[No direct reference]	Right implicitly recognized and underscored by cultural heritage which people identify as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions.
Article 11	Right to practice and revitalize their cultural traditions and customs.	Policy objectives, para. 11(h): To recognize, respect and preserve the culture, knowledge and practices of IPs.	Clear adherence.
Article 12	Right to manifest, practice, develop and teach their spiritual and religious traditions, customs and ceremonies.	Guiding principles, para. 22(b): Support IPs' rights related to land, territories and resources, and rights related to cultural and spiritual heritage and values, traditional knowledge, resource management systems and practices, occupations and livelihoods, customary institutions, and overall wellbeing.	Clear adherence.
Article 33	Right to determine their own identity or membership in accordance with their customs and traditions. <sup>45</sup> Right to determine the structures and to select the membership of their institutions in accordance with their own procedures.	Scope of application, para. 14(a): Self-identification as members of a distinct Indigenous social and cultural group and recognition of this identity by others.	Recognition of right to determine structures and select the membership of their institutions are not explicit in the GCF IPs Policy.

<sup>44</sup> As per Article 8, UNDRIP, this includes “any action which has the aim or effect of depriving them of their integrity as distinct peoples, or of their cultural values or ethnic identities; [...] dispossessing them of their lands, territories or resources; [...] forced population transfer which has the aim or effect of violating or undermining any of their rights; [...] forced assimilation or integration; [...] propaganda designed to promote or incite racial or ethnic discrimination directed against them”. (United Nations Office of the High Commissioner for Human Rights, 2007)

<sup>45</sup> Article 33, UNDRIP, says “This does not impair the right of indigenous individuals to obtain citizenship of the States in which they live.” (United Nations Office of the High Commissioner for Human Rights, 2007)

UNDRIP	STATEMENT OF THE STANDARD	GCF IPs POLICY	ASSESSMENT OF NARRATIVE
Article 34	Right to promote, develop and maintain their institutional structures and their distinctive customs, spirituality, traditions, procedures, practices and, in the cases where they exist, juridical systems or customs, in accordance with international human rights standards.	[No direct reference]	Implicit recognition.
Article 35	Right to determine the responsibilities of individuals to their communities.	[No direct reference]	Implicit recognition.
General provisions			
Article 37	Right to the recognition, observance and enforcement of treaties, agreements and other constructive arrangements concluded with States or their successors and to have States honour and respect such treaties, agreements and other constructive arrangements.	Overview of roles and responsibilities, para. 28: Compliance. GCF will require AEs to comply with their obligations specified in their accreditation, this Policy and any IPPs or IPPFs, applicable state laws and regulations, and obligations of the state directly applicable to the activities under relevant international treaties and agreements.	GCF IPs Policy requires recognition and observance by entities delivering climate action with GCF funds.
Article 38	States in consultation and cooperation with IPs, shall take the appropriate measures, including legislative measures, to achieve the ends of this Declaration.	Overview of roles and responsibilities, para. 33: The AEs are responsible for compliance with all applicable laws, including the laws, regulations and standards of the state(s) in which the activities are located, and the obligations of the state(s) directly applicable to the activities under relevant international treaties and agreements.	As above.
Article 40	Right to access to and prompt decision through just and fair procedures for the resolution of conflicts and disputes with States or other parties.	Policy objectives, para. 11(1): To ensure that all grievance mechanisms associated with GCF activities are effective in addressing issues raised by IPs and are accessible, fair, transparent and culturally appropriate.	Clear adherence.
Governance and development			
Article 18	Right to participate in decision-making in matters which would affect their rights, through representatives chosen	[No direct reference]	Implicit in many of the provisions of the GCF IPs Policy. Reference to positive



UNDRIP	STATEMENT OF THE STANDARD	GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	by themselves in accordance with their own procedures, as well as to maintain and develop their own Indigenous decision-making institutions.		contributions and leadership of IPs to climate change mitigation and adaptation; and the critical role of IPs in assisting GCF to ensure more effective, sustainable and equitable climate change results, outcomes and impacts and to enable them to be active leaders and participants in the process.
Article 19	Free, prior and informed consent before adopting and implementing legislative or administrative measures that may affect them.	Policy objectives, para. 11(j): To recognize and effectively apply the principle of free, prior and informed consent.	FPIC key component of GCF IPs Policy whenever consideration is being given to GCF-financed activities that will affect IPs' lands, territories, resources, livelihoods and cultures or require their relocation.
Article 20	Right to maintain and develop their political, economic and social systems or institutions, to be secure in the enjoyment of their own means of subsistence and development, and to engage freely in all their traditional and other economic activities.	Guiding principles, para. 22(b): Respect and enhance the rights of IPs to their lands, territories and resources.	Clear adherence.
Article 21	Right, without discrimination, to the improvement of their economic and social conditions. <sup>46</sup>	The development of the GCF IPs Policy has been guided by the International Covenant on Economic, Social and Cultural Rights and the International Convention on the Elimination of All Forms of Racial Discrimination.	The GCF IPs Policy recognizes that the economic, social and legal status of IPs frequently limit their capacity to defend their rights to, and interests in, land, territories and natural and cultural resources, and may restrict their ability to participate in and benefit from development initiatives and climate change actions.
Article 22	Rights and special needs of Indigenous elders, women,	[No direct reference]	Intersectional aspects of IPs' rights acknowledged in regard of consultation and compensation. Plus, the need to

<sup>46</sup> Article 21, UNDRIP, says "States shall take effective measures and, where appropriate, special measures to ensure continuing improvement of their economic and social conditions. Particular attention shall be paid to the rights and special needs of indigenous elders, women, youth, children and persons with disabilities." (United Nations Office of the High Commissioner for Human Rights, 2007)

UNDRIP	STATEMENT OF THE STANDARD	GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	youth, children and persons with disabilities. <sup>47</sup>		foster the meaningful inclusion and participation of Indigenous women and other marginalized groups, such as persons with disabilities.
Article 23	Right to determine and develop priorities and strategies for exercising their right to development.	Guiding principles, para. 22(h): Respect for the right of Indigenous communities to freely pursue their economic, social and cultural development and their right to autonomy or self-government in matters relating to their internal and local affairs, as well as ways and means for financing their autonomous functions.	Clear adherence.
Article 27	Fair, independent, impartial, open and transparent process, giving due recognition to IPs' laws, traditions, customs and land tenure systems, to recognize and adjudicate the rights of IPs pertaining to their lands, territories and resources, including those which were traditionally owned or otherwise occupied or used.	[No direct reference]	Recognized through concept of "cultural heritage" defined as resources with which people identify as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions; and "meaningful consultation".
Lands and territories			
Article 10	Not be forcibly removed from their lands or territories. No relocation shall take place without the free, prior and informed consent of the IPs concerned and after agreement on just and fair compensation and, where possible, with the option of return.	Guiding principles, para. 22(a): Effective consultation and application of FPIC if climate action requires relocation (see section 7.2 of GCF IPs Policy, Circumstances Requiring FPIC).	Clear adherence.
Article 25	Right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.	[No direct reference]	Section 7.2.3 of the GCF IPs Policy: Cultural heritage acknowledges potential impact of climate action on cultural and spiritual aspects of IPs' lives.
Article 26	Right to the lands, territories and resources which they	[No direct reference]	Recognized through the concept of

<sup>47</sup> Article 22, UNDRIP, says "States shall take measures, in conjunction with indigenous peoples, to ensure that indigenous women and children enjoy the full protection and guarantees against all forms of violence and discrimination." (United Nations Office of the High Commissioner for Human Rights, 2007)

UNDRIP	STATEMENT OF THE STANDARD	GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	have traditionally owned, occupied or otherwise used or acquired. <sup>48</sup>		“collective attachment” where for generations there has been a physical presence in and economic ties to land and territories traditionally owned, or customarily used or occupied, by the group concerned, including areas that hold special significance for the group, such as sacred sites.
Article 28	Right to redress for the lands, territories and resources which they have traditionally owned or otherwise occupied or used, and which have been confiscated, taken, occupied, used or damaged without their free, prior and informed consent. <sup>49</sup>	Referred to in Overview, roles and responsibilities, paras. 27(b) and (c).	Redress to be included in IPPs and/or IPPFs. GCF has Independent Redress Mechanism.
Article 29	Right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources. <sup>50</sup>	Policy objectives, para. 11(g): To promote and respect IPs’ rights to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those that they have otherwise acquired.	Rather than “conservation and protection” the GCF IPs Policy refers to “develop and control”. The introduction states that the economic, social and legal status of IPs frequently limit their capacity to defend their rights to, and interests in, land, territories and natural and cultural resources, and may restrict their ability to participate in and benefit from development initiatives and climate change actions.
Article 32	Right to determine and develop priorities and strategies for the development or use of their lands or territories	As for article 31.	Clear adherence.

<sup>48</sup> Article 26, UNDRIP, says “Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired. States shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned.” (United Nations Office of the High Commissioner for Human Rights, 2007)

<sup>49</sup> Article 28, UNDRIP, says “Unless otherwise freely agreed upon by the peoples concerned, compensation shall take the form of lands, territories and resources equal in quality, size and legal status or of monetary compensation or other appropriate redress.” (United Nations Office of the High Commissioner for Human Rights, 2007)

<sup>50</sup> Article 29, UNDRIP, says “States shall establish and implement assistance programmes for indigenous peoples for such conservation and protection, without discrimination.” (United Nations Office of the High Commissioner for Human Rights, 2007)

UNDRIP	STATEMENT OF THE STANDARD	GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	and other resources. <sup>51</sup>		
Education, communications and knowledge			
Article 13	Right to revitalize, use, develop and transmit to future generations their histories, languages, oral traditions, philosophies, writing systems and literatures, and to designate and retain their own names for communities, places and persons.	[No direct reference]	A gap in the GCF IPs Policy related to the sustainability of IPs' knowledge and practice.
Article 14	Right to establish and control their educational systems and institutions.	[No direct reference]	A gap in the GCF IPs Policy related to the sustainability of IPs' knowledge and practice.
Article 15	Right to the dignity and diversity of their cultures, traditions, histories and aspirations. <sup>52</sup>	Policy objectives, para. 11(f): Enable and further realize full respect for the rights, dignity, aspirations, identity, culture, lifestyle, autonomy, protagonism and natural resource-based livelihoods of IPs and territory management in the whole spectrum of activities and initiatives of GCF.	Clear adherence.
Article 16	Right to establish their own media in their own languages and to have access to all forms of non-Indigenous media.	[No direct reference]	Importance of Indigenous languages recognized in relation to identity and consultation.
Article 31	Right to maintain, control, protect and develop their cultural heritage, traditional knowledge and traditional cultural expressions, as well as the manifestations of their sciences, technologies and cultures, including human and genetic resources, seeds, medicines, knowledge of the properties of fauna and flora, oral traditions, literatures,	As above plus also Policy objectives, para. 1(i): To foster full respect of as well as promote and preserve IPs' cultural and spiritual heritage and values, traditional knowledge, natural and economic resource management systems and practices, occupations and livelihoods,	Clear adherence.

<sup>51</sup> Article 32, UNDRIP, says "States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources. States shall provide effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact." (United Nations Office of the High Commissioner for Human Rights, 2007)

<sup>52</sup> Article 15, UNDRIP, says "States shall take effective measures, in consultation and cooperation with the indigenous peoples concerned, to combat prejudice and eliminate discrimination and to promote tolerance, understanding and good relations among indigenous peoples and all other segments of society." (United Nations Office of the High Commissioner for Human Rights, 2007).

UNDRIP	STATEMENT OF THE STANDARD	GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	designs, sports and traditional games and visual and performing arts. Right to maintain, control, protect and develop their intellectual property over such cultural heritage, traditional knowledge, and traditional cultural expressions.	customary institutions and overall wellbeing.	
Labour, employment, training			
Article 17	Right to enjoy fully all rights established under applicable international and domestic labour law.	[No direct reference]	Adherence to ILO Convention 169 required.
Social security and health			
Article 24	Right to their traditional medicines and to maintain their health practices, including the conservation of their vital medicinal plants, animals and minerals.	[No direct reference]	Intellectual property of IPs for medicinal plants etc. recognized.
Contacts and cross-border cooperation			
Article 36	Right to maintain and develop contacts, relations and cooperation, including activities for spiritual, cultural, political, economic and social purposes, with their own members as well as other peoples across borders.	[No direct reference]	Implicit recognition.
Right of access to financial support			
Article 39	Right to have access to financial and technical assistance from States and through international cooperation, for the enjoyment of the rights contained in this Declaration.	Resource allocation section, paras. 98, 99, 100.	GCF financing tailored to IPs' needs and priorities; targeted support to IPs where equity of benefit-sharing in doubt.
Article 41	The organs and specialized agencies of the United Nations system and other intergovernmental organizations shall contribute to the full realization of the provisions of this Declaration through the mobilization, inter alia, of financial cooperation and technical assistance. Ways and means of ensuring participation of IPs on issues affecting them shall be established.		Clear adherence.

Source: IIED evaluation team

**Table A - 3.7. Evidence table 4: Benchmarking the GCF GCF IPs Policy against ILO Convention 169**

ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
General policy			
Article 1	Convention applies to tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations; peoples in independent countries who are regarded as Indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries; self-identification as Indigenous or tribal shall be regarded as a fundamental criterion for determining the groups to which the provisions of this Convention apply.	Scope of application, para. 14(a): Self-identification as members of a distinct Indigenous social and cultural group and recognition of this identity by others.	Clear adherence. ILO Convention 169 provides additional basis for identification. Collective attachment concept in GCF IPs Policy develops concept on coherent basis.
Article 3	Indigenous and tribal peoples shall enjoy the full measure of human rights and fundamental freedoms without hindrance or discrimination – including sexual/gender discrimination.	Guiding principles, para. 22(c): Recognize key international human rights and principles.	Clear adherence.
Article 4	Special measures shall be adopted as appropriate for safeguarding the persons, institutions, property, labour, cultures and environment of the peoples concerned – according to their wishes and without affecting rights as citizens.	Guiding principles, para. 22(d): Activities that may affect these peoples, their lands and territories, or their ways of life will include the appropriate measures to recognize, respect and protect their lands and territories, environment, health and culture, and to avoid contact with them as a consequence of the activity.	GCF IPs Policy identifies and allows for specific measures for IPs coherent with ILO Convention 169, article 4.
Article 5	Social, cultural, religious and spiritual values and practices of these peoples shall be recognized and protected as will the integrity of the values, practices and institutions of these peoples. Policies aimed at mitigating the difficulties experienced	Policy objectives, para. 11(i): To foster full respect of as well as promote and preserve IPs' cultural and spiritual heritage and values, traditional knowledge, natural and economic resource management systems and practices,	Clear adherence on recognition and protection. Policies for mitigating climate-related difficulties not clearly addressed in GCF IPs Policy.

ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	by these peoples in facing new conditions of life and work shall be adopted, with the participation and cooperation of the peoples affected.	occupations and livelihoods, customary institutions and overall well-being.	
Article 11	The exaction from members of the peoples concerned of compulsory personal services in any form, whether paid or unpaid, shall be prohibited and punishable by law, except in cases prescribed by law for all citizens.	[No direct reference]	
Article 12	Safeguarded against the abuse of their rights and shall be able to take legal proceedings, either individually or through their representative bodies, for the effective protection of these rights.	Policy objectives, para. 10: The overall objective of this policy 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 IPs.	High-level adherence.
General provisions			
Article 34	The nature and scope of the measures to be taken to give effect to this Convention shall be determined in a flexible manner, having regard to the conditions characteristic of each country.	[No direct reference]	Adherence through compliance of AEs etc.
Article 35	The application of the provisions of this Convention shall not adversely affect rights and benefits of the peoples concerned pursuant to other Conventions and Recommendations, international instruments, treaties or national laws, awards, custom or agreements.	Adherence in Requirements.	
Governance and development			
Article 2	Governments shall have the responsibility for developing, with the participation of the peoples concerned, coordinated and systematic action to protect the rights of these peoples and to guarantee respect for their	Overview of roles and responsibilities, para. 28: Compliance. GCF will require AEs to comply with their obligations specified in their accreditation, this policy and any IPPs or IPPFs, applicable state laws and regulations, and obligations of the state directly applicable to the activities under relevant international treaties and agreements.	GCF IPs Policy states that GCF will work with the AEs to develop and implement corrective actions that will bring the activities back into compliance. Failure to comply allows GCF to apply “remedies”. Role of governments articulated through what AEs should do. Host



ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	integrity. <sup>53</sup>		governments referred to, but in vague terms related to assessing impacts and consultation.
Article 6	In applying the provisions of this Convention, governments shall: consult the peoples concerned, through appropriate procedures and in particular through their representative institutions, whenever consideration is being given to legislative or administrative measures which may affect them directly; establish means by which these peoples can freely participate at all levels of decision-making in elective institutions and administrative and other bodies responsible for policies and programmes which concern them; establish means for the full development of these peoples' own institutions and initiatives, and in appropriate cases provide the resources necessary for this purpose.		Consultation and representation at project/programme level for GCF-funded climate action included.  Establishing means whereby IPs freely participate at all levels of decision-making not addressed in the GCF IPs Policy. This policy will assist GCF in incorporating considerations related to IPs into its decision-making while working towards the goals of climate change mitigation and adaptation.
Article 7	Right to decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being and the lands they occupy or otherwise use, and to exercise control, to the extent possible, over their own economic, social and cultural development. In addition, they shall participate in the formulation, implementation and evaluation of plans and programmes for national and regional development which may affect them directly.  Improvement of the conditions of life and work and levels of health and education of the peoples concerned, with their participation and cooperation, shall be a matter of priority in plans for the overall economic development	Guiding principles, para. 22: Respect the right of IPs under voluntary isolation; and respecting the system of self-government.	ILO Convention 169 has more much explicit and applied provisions for IPs' decisions on their development.

<sup>53</sup> Article 2, ILO Convention 169, says "Such action shall include measures for: (a) ensuring that members of these peoples benefit on an equal footing from the rights and opportunities which national laws and regulations grant to other members of the population; (b) promoting the full realisation of the social, economic and cultural rights of these peoples with respect for their social and cultural identity, their customs and traditions and their institutions; (c) assisting the members of the peoples concerned to eliminate socio-economic gaps that may exist between indigenous and other members of the national community, in a manner compatible with their aspirations and ways of life." (International Labour Organization, 2007)

ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	of areas they inhabit. Impact assessment studies. Governments shall take measures, in cooperation with the peoples concerned, to protect and preserve the environment of the territories they inhabit.		
Article 8	Due regard shall be had to their customs or customary laws in application of national laws and regulations to the peoples concerned. Right to retain their own customs and institutions. <sup>54</sup>	Guiding principles, para. 22(e): Respect and recognize traditional knowledge and livelihood systems. GCF recognizes, respects and values IPs' cultural heritage as well as traditional knowledge held by IPs and the Indigenous ways of ownership and knowledge transmission, and will promote the participation and leadership of traditional knowledge holders in GCF-financed activities.	Basis for clear adherence.
Article 9	Methods customarily practised by the peoples concerned for dealing with offences committed by their members shall be respected.	[No direct reference]	
Article 10	In imposing penalties laid down by general law on members of these peoples, account shall be taken of their economic, social and cultural characteristics. Preference shall be given to methods of punishment other than confinement in prison.	[No direct reference]	
Land and territories			
Article 13	Respect the special importance for the cultures and spiritual values of the peoples concerned of their relationship with the lands or territories. <sup>55</sup>	Concepts of "collective attachment"; "cultural heritage". Policy objectives, para. 11(g): To promote and respect IPs' rights to own, use, develop and	Clear adherence.

<sup>54</sup> Article 8, ILO Convention 169, says "Where these are not incompatible with fundamental rights defined by the national legal system and with internationally recognised human rights. Procedures shall be established, whenever necessary, to resolve conflicts which may arise in the application of this principle." (International Labour Organization, 2007)

<sup>55</sup> Article 13, ILO Convention 169, says "The term *lands* in Articles 15 and 16 shall include the concept of territories, which covers the total environment of the areas which the peoples concerned occupy or otherwise use." (International Labour Organization, 2007)

ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
		control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those that they have otherwise acquired.	
Article 14	Rights of ownership and possession over the lands which they traditionally occupy shall be recognized. In addition, measures shall be taken in appropriate cases to safeguard the right of the peoples concerned to use lands not exclusively occupied by them, but to which they have traditionally had access for their subsistence and traditional activities. <sup>56</sup>	As above. Rights of ownership recognized.	Usufruct rights, including access to common land and passage for mobility, not addressed in GCF IPs Policy.
Article 15	Rights to the natural resources pertaining to their lands shall be specially safeguarded. These rights include the right of these peoples to participate in the use, management and conservation of these resources. <sup>57</sup> Wherever possible, these people shall participate in the benefits of such activities, and shall receive fair compensation for any damages which they may sustain as a result of such activities.	As above.	Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation as well as to the natural resources in these areas is a recognized characteristic of IPs. And impacts on IPs' natural resources of climate action are also recognized.
Article 16	IPs shall not be removed from the lands which they occupy. <sup>58</sup>	Relocation of IPs from lands and natural resources subject to traditional ownership or	Relocation exceptions allowed for.

<sup>56</sup> Article 14, ILO Convention 169, says "Particular attention shall be paid to the situation of nomadic peoples and shifting cultivators in this respect." (International Labour Organization, 2007)

<sup>57</sup> Article 15, ILO Convention 169, says "In cases in which the State retains the ownership of mineral or sub-surface resources or rights to other resources pertaining to lands, governments shall establish or maintain procedures through which they shall consult these peoples, with a view to ascertaining whether and to what degree their interests would be prejudiced, before undertaking or permitting any programmes for the exploration or exploitation of such resources pertaining to their lands." (International Labour Organization, 2007)

<sup>58</sup> Article 16, ILP Convention 169, says "Where the relocation of these peoples is considered necessary as an exceptional measure, such relocation shall take place only with their free and informed consent. Where their consent cannot be obtained, such relocation shall take place only following appropriate procedures established by national laws and regulations, including public inquiries where appropriate, which provide the opportunity for effective representation of the peoples concerned [...] Whenever possible, these peoples shall have the right to return to their traditional lands, as soon as the grounds for relocation cease to exist [...] When such return is not possible, as determined by agreement or, in the absence of such agreement, through appropriate procedures, these peoples shall be provided in all possible cases with lands of quality and legal status at least equal to that of the lands previously occupied by them, suitable to provide for their present needs and future development. Where the peoples concerned express a preference for compensation in money or in kind, they shall be so compensated under appropriate guarantees [...] Persons thus relocated shall be fully compensated for any resulting loss or injury." (International Labour Organization, 2007)

ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
		under customary use or occupation, para. 60: GCF will not finance activities that would result in the involuntary resettlement of IPs except as permitted by paragraph 61. GCF will avoid funding activities that may involve physical displacement (such as relocation, including relocation needed as a result of loss of shelter), whether full or partial and permanent or temporary, or economic and occupational displacement (such as loss of assets or access to assets that leads to loss of income sources or means of livelihood) as a result of the activities.	
Article 17	Transmission of land rights among members of these peoples shall be respected. <sup>59</sup>	[No direct reference]	Customary practices recognized – but protection of land rights transmission not addressed directly in GCF IPs Policy.
Article 18	Adequate penalties shall be established by law for unauthorized intrusion upon, or use of, the lands of the peoples concerned and governments shall take measures to prevent such offences.	[No direct reference]	A gap in GCF IPs Policy.
Article 19	National agrarian programmes shall secure IPs' treatment equivalent to that accorded to other sectors of the population with regard to: provision of additional land to provide the essentials of a normal existence, or for any possible increase in their numbers; provision of the means required to promote the development of the lands which these peoples already possess.	[No direct reference]	A gap in GCF IPs Policy.
Education, communications and knowledge			
Article 26	Measures shall be taken to ensure that members of the	[No direct reference]	A gap in GCF IPs Policy.

<sup>59</sup> Article 17, ILP Convention 169, says “The peoples concerned shall be consulted whenever consideration is being given to their capacity to alienate their lands or otherwise transmit their rights outside their own community [...] Persons not belonging to these peoples shall be prevented from taking advantage of their customs or of lack of understanding of the laws on the part of their members to secure the ownership, possession or use of land belonging to them.” (International Labour Organization, 2007)

ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	peoples concerned have the opportunity to acquire education at all levels on at least an equal footing with the rest of the national community.		
Article 27	Education programmes and services for the peoples concerned shall be developed and implemented in cooperation with them to address their special needs and shall incorporate their histories, their knowledge and technologies, their value systems and their further social, economic and cultural aspirations. <sup>60</sup>	[No direct reference]	Relevant to own knowledge and development of that knowledge system.
Article 28	Children to be taught in own language; resources for fluency in national language; preserve and promote development and practice of Indigenous languages.	[No direct reference]	Relevant to own knowledge and development of that knowledge system.
Article 29	The imparting of general knowledge and skills that will help children belonging to the peoples concerned to participate fully and on an equal footing in their own community and in the national community shall be an aim of education for these peoples.	[No direct reference]	A gap in GCF IPs Policy.
Article 30	Governments shall adopt measures appropriate to the traditions and cultures of the peoples concerned, to make known to them their rights and duties, especially in regard to labour, economic opportunities, education and health matters, social welfare and their rights deriving from this Convention.	[No direct reference]	A gap in GCF IPs Policy.
Article 31	Educational measures shall be taken among all sections of the national community and particularly among those that are in most direct contact with the peoples concerned, with the object of eliminating prejudices that they may harbour in respect of these peoples.	[No direct reference]	A gap in GCF IPs Policy.

<sup>60</sup> Article 27, ILO Convention 169, says “The competent authority shall ensure the training of members of these peoples and their involvement in the formulation and implementation of education programmes, with a view to the progressive transfer of responsibility for the conduct of these programmes to these peoples as appropriate [...] In addition, governments shall recognise the right of these peoples to establish their own educational institutions and facilities, provided that such institutions meet minimum standards established by the competent authority in consultation with these peoples. Appropriate resources shall be provided for this purpose.” (International Labour Organization, 2007)

ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
Labour, employment, training			
Article 20	Special measures to ensure the effective protection with regard to recruitment and conditions of employment of workers belonging to IPs. Prevent any discrimination between IPs workers and other workers.	[No direct reference]	GCF IPs Policy does not address employment issues but references ILO Convention 169.
Article 21	Equal opportunities in respect of vocational training.	[No direct reference]	GCF IPs Policy does not address vocational training issues but references ILO Convention 169.
Article 22	Measures shall be taken to promote the voluntary participation of IPs in vocational training programmes of general application.	[No direct reference]	GCF IPs Policy does not address employment issues but references ILO Convention 169.
Article 23	Handicrafts, rural and community-based industries, and subsistence economy and traditional activities recognized as important factors in the maintenance of their cultures and in their economic self-reliance and development.  Appropriate technical and financial assistance shall be provided wherever possible, taking into account the traditional technologies and cultural characteristics of these peoples, as well as the importance of sustainable and equitable development.	[No direct reference]	GCF IPs Policy does not address employment issues but references ILO Convention 169.
Social security and health			
Article 24	Social security schemes shall be extended progressively to cover IPs and applied without discrimination against them.	[No direct reference]	GCF IPs Policy refers to social vulnerability – but social security not addressed.
Article 25	Governments shall ensure that adequate health services are made available to IPs, or shall provide them with resources to allow them to design and deliver such services under their own responsibility and control, so that they may enjoy the highest attainable standard of	[No direct reference]	A gap in GCF IPs Policy.

ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
	physical and mental health. <sup>61</sup>		
Contacts and cooperation across borders			
Article 32	Governments shall take appropriate measures, including by means of international agreements, to facilitate contacts and cooperation between Indigenous and tribal peoples across borders, including activities in the economic, social, cultural, spiritual and environmental fields.	[No direct reference]	A gap in GCF IPs Policy.
Administration			
Article 33	Government shall ensure that agencies or other appropriate mechanisms exist to administer the programmes affecting IPs and shall ensure that they have the means necessary for the proper fulfilment of the functions assigned to them. <sup>62</sup>	[No direct reference]	Adherence through compliance of AEs etc.
General provisions			
Article 34	The nature and scope of the measures to be taken to give effect to this Convention shall be determined in a flexible manner, having regard to the conditions characteristic of each country.	[No direct reference]	Adherence through compliance of AEs etc.
Article 35	The application of the provisions of this Convention shall not adversely affect rights and benefits of the peoples concerned pursuant to other Conventions and Recommendations, international instruments, treaties, or national laws, awards, custom or agreements.	Adherence in Requirements.	

<sup>61</sup> Article 25, ILO Convention 169, says “Health services shall, to the extent possible, be community-based. These services shall be planned and administered in co-operation with the peoples concerned and take into account their economic, geographic, social and cultural conditions as well as their traditional preventive care, healing practices and medicines. The health care system shall give preference to the training and employment of local community health workers, and focus on primary health care while maintaining strong links with other levels of health care services [...] The provision of such health services shall be co-ordinated with other social, economic and cultural measures in the country.” (International Labour Organization, 2007)

<sup>62</sup> Article 33, ILO Convention 169, says “These programmes shall include: (a) the planning, co-ordination, execution and evaluation, in co-operation with the peoples concerned, of the measures provided for in this Convention; (b) the proposing of legislative and other measures to the competent authorities and supervision of the application of the measures taken, in co-operation with the peoples concerned.” (International Labour Organization, 2007)



ILO CONVENTION 169	STATEMENT OF THE STANDARD	GCF GCF IPs POLICY	ASSESSMENT OF NARRATIVE
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Final provisions<sup>63</sup>

Source: IIED evaluation team

**Table A - 3.8. Evidence table 5: Importance and implications of UNFCCC decisions and agreements for the GCF IPs Policy and implementation**

UNFCCC DECISIONS AND AGREEMENTS <sup>64</sup>	EXPLANATION OF THE DECISION AND/OR AGREEMENT	IMPORTANCE AND IMPLICATION FOR GCF IPs POLICY AND ITS IMPLEMENTATION
Decision 1/CP.21 Adoption of the Paris Agreement	Actions taken to address climate change should respect, promote and consider respective obligations on human rights, including of IPs. Recognizes the need to strengthen knowledge, technologies, practices and efforts of local communities and IPs related to addressing and responding to climate change and	This decision reaffirms the importance of the foundational standards set out in UNDRIP and ILO Convention 169. Indicates the need to recognize and build

<sup>63</sup> The ILO Convention 169 Final Provisions include:

Article 36: "This Convention revises the Indigenous and Tribal Populations Convention, 1957."

Article 37: "The formal ratifications of this Convention shall be communicated to the Director-General of the International Labour Office for registration."

Article 38: "1. This Convention shall be binding only upon those Members of the International Labour Organisation whose ratifications have been registered with the Director-General. 2. It shall come into force twelve months after the date on which the ratifications of two Members have been registered with the Director-General. 3. Thereafter, this Convention shall come into force for any Member twelve months after the date on which its ratification has been registered."

Article 39: "1. A Member which has ratified this Convention may denounce it after the expiration of ten years from the date on which the Convention first comes into force, by an act communicated to the Director-General of the International Labour Office for registration. Such denunciation shall not take effect until one year after the date on which it is registered. 2. Each Member which has ratified this Convention and which does not, within the year following the expiration of the period of ten years mentioned in the preceding paragraph, exercise the right of denunciation provided for in this Article, will be bound for another period of ten years and, thereafter, may denounce this Convention at the expiration of each period of ten years under the terms provided for in this Article."

Article 40: "1. The Director-General of the International Labour Office shall notify all Members of the International Labour Organisation of the registration of all ratifications and denunciations communicated to him by the Members of the Organisation. 2. When notifying the Members of the Organisation of the registration of the second ratification communicated to him, the Director-General shall draw the attention of the Members of the Organisation to the date upon which the Convention will come into force."

Article 41: "The Director-General of the International Labour Office shall communicate to the Secretary-General of the United Nations for registration in accordance with Article 102 of the Charter of the United Nations full particulars of all ratifications and acts of denunciation registered by him in accordance with the provisions of the preceding Articles."

Article 42: "At such times as it may consider necessary the Governing Body of the International Labour Office shall present to the General Conference a report on the working of this Convention and shall examine the desirability of placing on the agenda of the Conference the question of its revision in whole or in part."

Article 43: "1. Should the Conference adopt a new Convention revising this Convention in whole or in part, then, unless the new Convention otherwise provides (a) the ratification by a Member of the new revising Convention shall ipso jure involve the immediate denunciation of this Convention, notwithstanding the provisions of Article 39 above, if and when the new revising Convention shall have come into force; (b) as from the date when the new revising Convention comes into force this Convention shall cease to be open to ratification by the Members. 2. This Convention shall in any case remain in force in its actual form and content for those Members which have ratified it but have not ratified the revising Convention."

Article 44: "The English and French versions of the text of this Convention are equally authoritative."

<sup>64</sup> Local Communities and Indigenous Peoples Platform (n.d.).

UNFCCC DECISIONS AND AGREEMENTS <sup>64</sup>	EXPLANATION OF THE DECISION AND/OR AGREEMENT	IMPORTANCE AND IMPLICATION FOR GCF IPs POLICY AND ITS IMPLEMENTATION
	<p>establishes a platform for the exchange of experiences and sharing of best practices on mitigation and adaptation.</p> <p>Adaptation action should be based on and guided by the best available science and, as appropriate, traditional knowledge, knowledge of IPs and local knowledge systems.</p>	<p>upon IPs' knowledge and experience for investments in climate action.</p> <p>Reiterates the need to identify and invest in the curation of IPs' knowledge.</p>
Decision 2/CP.23 LCIPP	<p>Sets the purposes of the platform to strengthen the knowledge, technologies, practices and efforts of local communities and IPs related to addressing and responding to climate change; to facilitate the exchange of experience and the sharing of best practices and lessons learned related to mitigation and adaptation in a holistic and integrated manner; and to enhance the engagement of local communities and IPs in the UNFCCC process.</p> <p>To follow principles proposed by IPOs: full and effective participation of IPs; equal status of IPs and Parties, including in leadership roles; self-selection of IPs' representatives in accordance with IPs' own procedures.</p>	<p>Establishes the LCIPP as a mechanism for IPs' knowledge management and implies the importance of coordination and collaboration with this mechanism.</p> <p>Sets the aspiration for bodies (including GCF) to facilitate IPs' full and effective participation in accordance with their own ways of governance and representation.</p>
SBSTA 48 conclusion	SBSTA notes the importance of Indigenous and traditional knowledge in relevant aspects of scientific data and research and in communication at the science-policy interface and the functions of the LCIPP FWG.	Reaffirms the importance of IPs' knowledge and its complementarity with scientific knowledge.
Decision 2/CP.24 LCIPP	Decides to establish the LCIPP FWG with a workplan, including collaboration with other bodies under and outside the UNFCCC.	Indicates the importance of working with the LCIPP FWG.
SBSTA 51 conclusion	SBSTA reaffirms the importance of enhancing the coherence between the LCIPP FWG and relevant bodies under and outside the Convention consistently with their relevant mandates.	As above.
Decision 16/CP.26 LCIPP	Invites relevant bodies under the UNFCCC to take into account the recommendations of the LCIPP FWG to the SBSTA on the engagement and input of IPs and local communities across the UNFCCC process, and decides to continue the mandate of the LCIPP FWG.	Requires acknowledgement of and adherence with LCIPP FWG recommendations on engagement with and contributions from IPs.
Draft decision -/CP.26 Report of the Green Climate Fund to the Conference of the Parties and guidance to the Green Climate Fund	<p>Encourages the GCF Board to further clarify the role of data and information from, inter alia, the IPCC and traditional, local and Indigenous knowledge and practices in the assessment of concept notes, project preparation funding applications and FP.</p> <p>Encourages the GCF Board to strengthen country ownership and regional management by proactively engaging NDAs in all aspects of the project and programme cycle.</p> <p>Encourages the GCF Board to continue the integration of gender considerations into its activities, including through its Gender Policy and by promoting gender balance across</p>	<p>Requests accountability for the ways in which GCF balances and incorporates scientific and IPs' knowledge resources.</p> <p>Highlights the issue of how GCF can engage with IPs in countries where IPs' rights and recognition are weak or absent.</p> <p>Emphasizes the intersectionality aspects of</p>

UNFCCC DECISIONS AND AGREEMENTS <sup>64</sup>	EXPLANATION OF THE DECISION AND/OR AGREEMENT	IMPORTANCE AND IMPLICATION FOR GCF IPs POLICY AND ITS IMPLEMENTATION
	the structures of the Fund.	IPs engagement.
Draft decision -/CP.29	Encourages Parties, relevant constituted bodies and representatives of work programmes under the Convention and the Paris Agreement and other stakeholders to actively collaborate with the LCIPP FWG.	Again, reiterates importance of collaboration with the FWG of the LCIPP.

Source: IIED evaluation team

**Table A - 3.9. Evidence table 6: Adherence of comparator policies to foundational and operational standards from UNDRIP and ILO Convention 169**

STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	IFAD IPs POLICY (UPDATED 2022) <sup>65</sup>	AfDB ISS (UPDATED 2023) <sup>66</sup>	IFC ESS <sup>67</sup> (PERFORMANCE STANDARD 7)
General policy	<ul style="list-style-type: none"> <li>• Self-determination</li> <li>• IPs' self-identification</li> <li>• Right to nationality</li> <li>• State government's responsibilities</li> <li>• Human rights and no discrimination</li> <li>• IPs' cultural safeguarding and protection</li> <li>• Respect of customary</li> </ul>	<p>Principles of engagement address:</p> <ul style="list-style-type: none"> <li>• Self-identification</li> <li>• Cultural safeguarding and protection</li> <li>• Customary practices</li> <li>• Self-determination</li> </ul>	<p>IPs referred to as HVRM.<sup>68</sup> HVRM refers to specific sociocultural minority groups in rural areas whose culture and life are vitally and sustainably dependent on natural resources and/or landscapes of their living environments, and whose cultures and quality of life are under threat whenever the features of these resources or landscapes are substantially deteriorated. This includes minorities qualified as IPs under national legislation, such as forest dwellers, traditional pastoralists, hunter-gatherers and</p>	<p>Objectives include:</p> <ul style="list-style-type: none"> <li>• Full respect for the human rights, dignity, aspirations, culture and natural resource-based livelihoods of IPs</li> <li>• To respect and preserve the culture, knowledge and practices of IPs</li> </ul> <p>Scope of application includes:</p> <ul style="list-style-type: none"> <li>• Self-identification,</li> </ul>

<sup>65</sup> See International Fund for Agricultural Development (2022).

<sup>66</sup> See African Development Bank (2023).

<sup>67</sup> See International Finance Corporation (2012).

<sup>68</sup> In the AfDB ISS (updated 2023), "vulnerable groups" refers to individuals or a group of individuals who may be more likely to be adversely affected by the project impacts and/or are more limited than others in their ability to take advantage of a project's benefits. These individuals or groups are also more likely to be excluded from, or be unable to participate fully in, the mainstream consultation process and as such may require specific measures and/or assistance to do so. Depending on the specific context of the project, vulnerable groups may include, among others, female-headed households, the landless, the elderly, youth and children, persons with disabilities, groups who are marginalized on the basis of ethnicity, religion and/or language as well as sexual orientation and gender identity, and HVRM, including groups referred to as "Indigenous Peoples" in some contexts. Vulnerability is not an inherent characteristic of people and does not occur in a vacuum. Women, for instance, are not inherently more vulnerable than men; however, discrimination, entrenched social roles and attitudes, poverty and lack of access to decision-making can weaken their resilience and render them vulnerable to project risks and adverse impacts. Vulnerability is thus context specific and is to be understood through the interplay of three factors: (i) exposure to risk and adverse impacts; (ii) sensitivity to those risks and impacts; and (iii) adaptive capacity.

STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	IFAD IPS POLICY (UPDATED 2022) <sup>65</sup>	AfDB ISS (UPDATED 2023) <sup>66</sup>	IFC ESS <sup>67</sup> (PERFORMANCE STANDARD 7)
	<p>practices</p> <ul style="list-style-type: none"> <li>• Autonomy and self-determination</li> <li>• IPs subject to state laws</li> </ul>		<p>nomadic groups.</p> <p>African Development Bank (2023, section A) seeks to ensure that there is no prejudice or discrimination against project-affected individuals or communities and gives particular consideration to vulnerable groups, including HVRM groups, especially where adverse impacts may arise or development benefits are to be shared.</p>	<p>collective attachment,<sup>69</sup> separate institutions, distinct language</p> <p>Avoidance of adverse impacts:</p> <ul style="list-style-type: none"> <li>• Identify nature and degree of the expected direct and indirect economic, social, cultural (including cultural heritage) and environmental impacts</li> <li>• Proposed actions will be developed with the ICP of the affected communities of IPs and contained in a time-bound plan, (such as an IPP) or a broader community development plan with separate components for IPs.</li> </ul>
General provisions	<ul style="list-style-type: none"> <li>• Implementation of Convention having regard to country conditions</li> <li>• No impact on other rights and benefits</li> <li>• Recognition and enforcement of treaties</li> </ul>		<p>Overview sets out improvements to 2013 ISS, including:</p> <ul style="list-style-type: none"> <li>• Need to enhance governance</li> <li>• Inclusion and discrimination</li> <li>• Contextual risks and impacts (such as land-use conflicts) and human rights</li> <li>• Natural and human-made climate change</li> </ul> <p>Refers to Universal Declaration of Human Rights, the Charter of the United Nations and the African Charter of Human and</p>	

<sup>69</sup> IPs identity as a group or community is linked to distinct habitats or ancestral territories and the natural resources therein. It also applies to communities or groups that have lost collective attachment to distinct habitats or ancestral territories in the project area, occurring within the concerned group members' lifetime, because of forced severance, conflict, government resettlement programmes, dispossession of their lands, natural disasters, or incorporation of such territories into an urban area.

STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	IFAD IPS POLICY (UPDATED 2022) <sup>65</sup>	AfDB ISS (UPDATED 2023) <sup>66</sup>	IFC ESS <sup>67</sup> (PERFORMANCE STANDARD 7)
			<p>Peoples' Rights (Banjul). Does not refer to UNDRIP nor ILO Convention 169.</p> <p>Social risks and impacts addressed by ISS include impacts on peoples' way of life, their culture and communities (including from a legacy perspective).</p> <p>The ISS sets out the case for strategic environmental and social assessments (SESAs) to examine environmental and social risks and issues associated with a policy, plan or programme, typically at the national level but also in smaller areas. The examination of environmental and social risks will include consideration of the full range of environmental and social risks incorporated in the OS, including the capacity to address sensitive issues such as the rights and interests of IPs.</p>	
Governance and economic development	<ul style="list-style-type: none"> <li>• Right, without discrimination (for example, due to gender, age, disability), to the improvement of their economic and social conditions</li> <li>• FPIC</li> <li>• Consultation</li> <li>• Just and fair conflict resolution</li> <li>• Inclusion in decision-making at all levels</li> <li>• Right to own</li> </ul>	<p>Principles of engagement address:</p> <ul style="list-style-type: none"> <li>• Promoting IPs' economies and products and supporting their community-based enterprises, economic initiatives and the recognition of Participatory Guarantee Systems</li> <li>• Paying particular attention to Indigenous women's and youths' economic empowerment, including by improving market access for IPs' products (for example, seeds, crops, fruits, vegetables, meat, milk, livestock and fish products and non-farm products); market information, infrastructure and technology</li> </ul>	<p>Overview includes:</p> <ul style="list-style-type: none"> <li>• The updated AfDB ISS</li> <li>• Support for borrowers towards, among other things enhancing non-discrimination, transparency, participation, accountability and governance</li> </ul> <p>In E&amp;S OS7, vulnerable groups, the ISS requires borrowers to properly address discriminatory practices, inequalities and other factors that contribute to vulnerability and will, as appropriate, strengthen the adaptive capacity of vulnerable individuals or groups by promoting inclusive development and benefit-sharing.</p> <p>E&amp;S OS9 encourages the consideration of</p>	<p>Objectives include:</p> <ul style="list-style-type: none"> <li>• Promote sustainable development benefits and opportunities for IPs in a culturally appropriate manner</li> <li>• To establish and maintain an ongoing relationship based on ICP with the IPs affected by a project throughout its life cycle</li> <li>• To ensure the FPIC of the affected communities of IPs (when the circumstances described in this</li> </ul>

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	development (RtOD)	<ul style="list-style-type: none"> <li>• FPIC</li> <li>• Community-driven development</li> <li>• RtOD: in dialogue with governments, IFAD supports IPs' participation in defining and implementing policies and programmes and actions that promote territorial management and their economies, while preserving their habitat through conservation and adaptation strategies rooted in their ancestral knowledge and practices</li> </ul>	<p>environmental and social governance issues in capital market institutions such as development finance entities and stock exchanges (refers to World Federation of Exchanges principles that do not address IPs engagement.<sup>70</sup> Similarly, the UNEP and World Bank Roadmap for a sustainable financial system does not address IPs).<sup>71</sup></p> <p>The AfDB ISS defines FPIC as “a process of dialogue and negotiation that goes beyond mere consultation, where seeking the consent of the HVRM is always the objective and in certain circumstances consent is actually required [...] The pursuit of FPIC should be undertaken in accordance with the HVRM group’s own customary norms and traditional methods of decision-making, with their legitimate representatives, and should be culturally appropriate. Any conflict should be resolved within the community membership itself.”<sup>72</sup></p>	<p>Performance Standard are present)</p> <ul style="list-style-type: none"> <li>• Involve IPs’ representative bodies and organizations, as well as members of the affected communities of IPs; and Provide sufficient time for IPs’ decision-making processes</li> <li>• FPIC applies to project design, implementation and expected outcomes related to impacts affecting the communities of IPs.<sup>73</sup> When any of these circumstances apply, the client will engage external experts to assist in the identification of the project risks and impacts</li> </ul> <p>FPIC is required when there are impacts on lands and natural resources subject to traditional ownership or under customary use;</p>

<sup>70</sup> See World Federation of Exchanges (2018).

<sup>71</sup> See Maimbo and others (2017).

<sup>72</sup> AfDB ISS describes FPIC as: “Free: of intimidation or coercion; Prior: timely in relation to the assessment process, allowing sufficient time to access and understand information and prepare responses; and Informed: advance provision of relevant, understandable and accessible information, in the appropriate language. Consent: does not mean ‘veto’ or ‘unanimity’ on the project before the Board consideration. [...] If the Borrower proposes to locate a project or activities, or commercially develop natural resources on land traditionally owned by, or under the customary use or occupation of, HVRM, and if adverse impacts can be expected, the Borrower shall take the following steps and obtain their FPIC: Document efforts to avoid and otherwise minimize the area of land proposed for the project. This may include identification and consideration of feasible alternative project designs that could protect HVRM customary occupation and interest on the land” (African Development Bank, 2023).

<sup>73</sup> FPIC builds on and expands the process of ICP described in Performance Standard 1 and will be established through good faith negotiation between the client and the affected communities of IPs. The client will document: (i) the mutually accepted process between the client and affected communities of IPs, and (ii) evidence of agreement between the parties as the outcome of the negotiations. FPIC does not necessarily require unanimity and may be achieved even when individuals or groups within the community explicitly disagree.

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				relocation of IPs from lands and natural resources subject to traditional ownership or under customary use; critical cultural heritage.
Lands and territories	<ul style="list-style-type: none"> <li>• Cultural importance of lands</li> <li>• Rights of ownership and usufruct rights</li> <li>• Rights to benefit from natural resources</li> <li>• Right to remain on land</li> <li>• Rights to transmit ownership to next generation</li> <li>• Laws against non-IP incursion</li> <li>• Inclusion in agrarian development</li> </ul>	<p>Principles of engagement address:</p> <ul style="list-style-type: none"> <li>• Equitable access to land territories and resources by IPs and enhancing their tenure security</li> </ul>	<p>Updated AfDB ISS addresses, among other issues, contextual risks and impacts such as land-use conflicts, human rights.</p> <p>E&amp;S OS5 addresses land acquisition, restrictions on access to land and land-use, and involuntary resettlement.</p> <p>Social risks and impacts addressed by ISS include:</p> <ul style="list-style-type: none"> <li>• Negative economic and social impacts relating to the involuntary land acquisition or restrictions on land access and use</li> <li>• Risks or impacts associated with land and natural resource tenure and use, including, as relevant, potential project impacts on local land-use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources.</li> </ul> <p>HVRM (including IPs recognized through national legislation) may be particularly vulnerable to the loss of, alienation from, or exploitation of their land and access to the</p>	<p>Performance Standard 5 (land acquisition and involuntary resettlement)<sup>76</sup> objectives:</p> <ul style="list-style-type: none"> <li>• To avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs; to avoid forced eviction; to anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land-use by: (i) providing compensation for loss of assets at replacement cost; and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation and the informed participation of those</li> </ul>

<sup>76</sup> Performance Standard 5 does not apply to resettlement resulting from voluntary land transactions (that is, market transactions in which the seller is not obliged to sell and the buyer cannot resort to expropriation or other compulsory procedures sanctioned by the legal system of the host country if negotiations fail). It also does not apply to impacts on livelihoods where the project is not changing the land use of the affected groups or communities project. This may include identification and consideration of feasible alternative project designs that could protect HVRM customary occupation and interest on the land.



STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	IFAD IPS POLICY (UPDATED 2022) <sup>65</sup>	AfDB ISS (UPDATED 2023) <sup>66</sup>	IFC ESS <sup>67</sup> (PERFORMANCE STANDARD 7)
			<p>natural and cultural resources.</p> <p>E&amp;S OS5 seeks to avoid involuntary resettlement where feasible, or minimize resettlement impacts where involuntary resettlement is deemed unavoidable after all alternative project designs have been explored. Its application includes where restrictions on land-use and access to natural resources cause a community or groups within a community to lose access to resource usage where they have traditional or customary tenure, or recognizable usage rights; and, restriction on access to land or use of other resources, including communal property and natural resources, such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, leisure and education areas, sacred and worship areas, hunting and gathering grounds, and grazing and cropping areas.</p> <p>ISS provides for careful assessment and design to help ensure that projects do not inadvertently compromise existing legitimate rights (including collective rights, subsidiary rights and the rights of women) or have other unintended consequences, particularly where the project supports land titling and related issues.<sup>74</sup></p> <p>Resettlement (provided for under E&amp;S OS5) is considered involuntary when</p>	<p>affected; to improve, or restore, the livelihoods and standards of living of displaced persons; to improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites.</p> <p>Performance Standard 6 (conservation and sustainable management of living natural resources) objectives:</p> <ul style="list-style-type: none"> <li>• To protect and conserve biodiversity</li> <li>• To maintain the benefits from ecosystem services</li> <li>• To promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities</li> </ul>

<sup>74</sup> “In such circumstances, the Borrower will at a minimum demonstrate to the Bank’s satisfaction that applicable laws and procedures, along with project design features (a) provide clear and adequate rules for the recognition of relevant land tenure rights; (b) establish fair criteria and functioning, transparent and participatory processes for resolving competing tenure claims; and (c) include genuine efforts to inform affected people about their rights and provide access to impartial advice” (African Development Bank, 2024a).

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			<p>affected persons or communities do not have the right or genuine opportunity, free from coercion or intimidation, to refuse land acquisition or restrictions on land access or use that result in loss of assets or displacement.</p> <p>E&amp;S OS7 states that “HVRM may not possess legal title to land as defined by national law, their use of the land, including seasonal or cyclical use, for their livelihoods or for cultural, ceremonial, and spiritual purposes that define their identity and community can often be substantiated and documented. The Borrower shall prepare a plan for the legal recognition of such ownership, occupation, or usage, with due respect of the customs, traditions, and land tenure systems of the HVRM concerned” when projects involve certain actions.<sup>75</sup> The objective of these plans will be to achieve full legal recognition of existing customary land tenure systems of HVRM or the conversion of customary usage rights to communal and/or individual ownership rights. If neither option is possible under national law, the plan includes measures for the legal recognition of HVRM’s perpetual or long-term, renewable custodial or use rights.</p>	
Labour, employment,	• Effective protection of conditions and no	[Not addressed]	E&S OS2 deals with labour and working conditions.	Performance Standard 2 (labour and working

<sup>75</sup> These include: (i) activities that are contingent on establishing legally recognized rights to lands and territories that HVRM have traditionally owned or customarily used or occupied (e.g. extractive industries, creation of conservation areas, agro-development schemes, greenfield infrastructure development, land management or titling programmes); or (ii) the acquisition of such lands (African Development Bank, 2024b).

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training	discrimination <ul style="list-style-type: none"> <li>• Equal opportunities</li> <li>• Voluntary participation</li> <li>• Respect and support of cultural livelihood activities</li> </ul>		E&S OS2 is informed by the ILO Declaration on the Fundamental Principles and Rights at Work and the United Nations GPBHR. <sup>77</sup> The latter recognize that IPs are often excluded from legal protection of their human rights.	conditions) objectives: <ul style="list-style-type: none"> <li>• To promote the fair treatment, non-discrimination and equal opportunity of workers</li> <li>• To establish, maintain and improve the worker-management relationship</li> <li>• To promote compliance with national employment and labour laws</li> <li>• To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties and workers in the client's supply chain</li> <li>• To promote safe and healthy working conditions and the health of workers</li> <li>• To avoid the use of forced labour</li> </ul>
Social security and health	<ul style="list-style-type: none"> <li>• Access to social security without discrimination</li> <li>• Appropriate health care</li> </ul>	[Not addressed]	[Not addressed]	Performance Standard 4 (community health, safety and security) objectives: <ul style="list-style-type: none"> <li>• To anticipate and avoid adverse impacts on the health and safety of the Affected Community during the project life from both</li> </ul>

<sup>77</sup> The ILO Declaration and United Nations Guiding principles are universal but not specific to IPs.

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				<p>routine and non-routine circumstances</p> <ul style="list-style-type: none"> <li>• To ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimizes risks to the affected communities</li> </ul> <p>[Social security not addressed]</p>
Education, communications and knowledge	<ul style="list-style-type: none"> <li>• Equal opportunities of access to all IPs at all levels</li> <li>• Address special needs</li> <li>• Respect for histories, knowledge and expertise</li> <li>• Education and communications in own language</li> </ul>	<p>Principles of engagement address: IPs' knowledge and practices in investment projects with particular attention to intergenerational transfer of knowledge between elders and youth. Supports IPs' research on the diversity of their resilience systems and capacities to adapt to climate change, thus complementing conventional science and providing a holistic understanding of the environment, natural resources and culture, and the human interrelation with them.</p>	<p>An objective of E&amp;S OS7 is to recognize, respect and preserve the culture, knowledge and practices of highly vulnerable cultural groups and minorities, including IPs, and to provide them with an opportunity to adapt to changing conditions that could arise due to project activities in a manner and in a time frame acceptable to them.</p>	<p>[Education not addressed]</p> <p>[External communications addressed as related to information provision to stakeholders and in relation to grievance mechanisms]</p> <p>[Expert knowledge referred to mainly]</p> <p>Performance Standard 7 (Indigenous Peoples) objectives:</p> <ul style="list-style-type: none"> <li>• To respect and preserve the culture, knowledge and practices of IPs</li> <li>• FPIC: fair and equitable sharing of benefits from commercialization of such knowledge, innovation or practice, consistent with the customs and traditions of the IPs</li> </ul>

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				Performance Standard 8 (cultural heritage). Scope of application: knowledge is an intangible form of heritage and can be commercialized.
Contacts and cross-border cooperation	Governments facilitate contacts and cooperation across borders	[Not addressed]	[Not addressed]	[Not addressed]
Right of access to financial support	Right of access to financial and technical assistance from States and through international cooperation.	Principles of engagement address: <ul style="list-style-type: none"> <li>• Mobilizing and channelling environmental and climate-finance to IPs both through its tested instruments and by enhancing their ability to participate in and benefit from climate change actions funded by the Global Environment Facility, GCF and Adaptation Fund and possibly by the private sector.</li> </ul>	Projects that are solely for the benefit of HVRM are considered.  Affected HVRM may seek support for various initiatives that the Borrower and the Bank should consider, including: (i) support for the development priorities of HVRM through programmes (such as community-driven development programmes and locally managed social funds) developed by governments in cooperation with HVRM; (ii) preparation of participatory profiles of HVRM to document their culture, demographic structure, gender and intergenerational relations, and social organization, institutions, production systems, religious beliefs and resource use patterns; and (iii) facilitating partnerships among the government, HVRM, civil society organizations, community-based organizations and the private sector to promote HVRMs' development programmes.	[Not addressed]

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Capacities for dialogue and administration of measures	<ul style="list-style-type: none"> <li>• Government agencies and AEs able to carry out functions</li> <li>• IPs and IPOs able to dialogue with state agencies and other organizations</li> </ul>	<p>Principles of engagement address:<sup>78</sup></p> <ul style="list-style-type: none"> <li>• Supporting the empowerment of IPs by providing resources for capacity-building to empower them to effectively interact and negotiate with local and national governments, private companies and other parties to secure and manage their resources and lead their own development processes.</li> <li>• Paying particular attention to reducing inequality and empowering Indigenous youth socially and economically through initiatives that take into account intergenerational relations, to ensure that their knowledge, identity and traditions are passed on to the next generation.</li> </ul>	<p>E&amp;S OS9 addresses the capacities of financial intermediaries to consult and administer projects compliant with all operational safeguards.</p> <p>Nothing specific to engagement with IPs.</p>	<p>Where government is responsible for managing IPs' issues:</p> <ul style="list-style-type: none"> <li>• Where government capacity is limited, the client will play an active role during planning, implementation and monitoring of activities to the extent permitted by the agency.</li> </ul>
Additional aspects		<p>Gender equality:</p> <ul style="list-style-type: none"> <li>• Particular attention will be paid to the empowerment of Indigenous women by: (i) expanding their access to and control over resources such as land, capital, traditional knowledge and technologies; (ii) strengthening their agency, decision-making role in community affairs, and representation</li> </ul>	<p>Cultural heritage:</p> <ul style="list-style-type: none"> <li>• E&amp;S OS8 recognizes that cultural heritage is an inherent and essential part of self-identification and that it provides continuity in tangible and intangible forms between the past, present and future.</li> <li>• E&amp;S OS8 sets out general provisions on the risks to and impacts on cultural heritage from project activities. E&amp;SOS7 sets out</li> </ul>	

<sup>78</sup> According to IFAD, "A necessary aspect of the implementation of this policy is strengthening the internal process of information dissemination, knowledge generation and management, capacity building and peer support. In this regard, while a digital toolbox and an e-learning course have recently been developed, additional capacity-building activities targeted at staff with social inclusion responsibilities will be developed, as much as possible by joining hands with learning programmes of other organizations such as FAO, Inter-Agency Support Group (IASG), International Training Centre of the International Labour Organization (ITC-IL) in Turin, and regional Indigenous Peoples' organizations. In addition, existing information-sharing mechanisms such as learning notes, thematic groups, portfolio reviews and workshops will be used as vehicles for sharing information and knowledge with a broader network of staff, other organizations and interested parties. IFAD will ensure that the institution's commitment to Indigenous Peoples is highly visible in its public communication and outreach activities." (International Fund for Agricultural Development, 2022)

STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	IFAD IPS POLICY (UPDATED 2022) <sup>65</sup>	AfDB ISS (UPDATED 2023) <sup>66</sup>	IFC ESS <sup>67</sup> (PERFORMANCE STANDARD 7)
		<p>in local institutions; and (iii) building on their untapped potential for sustainable development, by recognizing their role as stewards of natural resources and biodiversity, and as bearers of rich traditional knowledge systems.</p> <p>Food sovereignty, food security and nutrition:</p> <ul style="list-style-type: none"> <li>• Ensuring the protection and preservation of IPs' foods systems, secure access rights over their lands, territories and natural resources, as well as their cultural, social and spiritual wellbeing</li> <li>• Promoting: (i) diverse and Indigenous food sources, and cultural and social practices linked to food gathering and production; (ii) agroecological and territorial management practices; and (iii) the availability, accessibility, affordability and consumption of diverse, nutritious foods, including neglected and underutilized species and their genetic protection</li> </ul>	<p>additional requirements for cultural heritage in the context of vulnerable groups and HVRM, including IPs. E&amp;S OS6 recognizes the social and cultural values of biodiversity.</p>	
Instruments for policy implementation		<ul style="list-style-type: none"> <li>• IPs' Forum: can directly channel finance to IPs' communities</li> <li>• Social, environmental and climate assessment procedures (Article 4)</li> <li>• Engagement in all steps of project cycle</li> <li>• M&amp;E outreach disaggregation by</li> </ul>	<p>E&amp;S OS10: Stakeholder engagement and information disclosure seeks to promote and provide the means for safe, effective and inclusive engagement with project-affected parties, inclusive of women's perspectives, in an equitable manner, and vulnerable groups, in a manner free of reprisal, throughout the project lifecycle on issues</p>	



STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	IFAD IPS POLICY (UPDATED 2022) <sup>65</sup>	AfDB ISS (UPDATED 2023) <sup>66</sup>	IFC ESS <sup>67</sup> (PERFORMANCE STANDARD 7)
		<p>Indigenous households and person-based data disaggregation of IPs by sex and age</p> <ul style="list-style-type: none"> <li>• Funding for regional and country-specific grants to build the capacities of IPOs</li> <li>• Cross-departmental working group mobilized to update the policy document will be maintained to monitor the policy's implementation, to act as a peer support mechanism, and to strengthen engagement with IPs</li> </ul>	<p>that could potentially affect them; and to enhance project benefits and mitigate harm to local communities. Provisions include:</p> <ul style="list-style-type: none"> <li>• Stakeholder identification and analysis</li> <li>• Stakeholder engagement plan</li> <li>• Information disclosure</li> <li>• Meaningful consultation</li> </ul> <p>Grievance mechanism and addressing reprisal risks are set out in E&amp;S OS10 and 11.</p>	

Source: IIED evaluation team

**Table A - 3.10. Evidence table 7: Adherence of FAO and UNDP IPs policies against foundational and operational standards from UNDRIP and ILO Convention 169**

STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	FAO POLICY ON INDIGENOUS AND TRIBAL PEOPLES (2 <sup>ND</sup> ED., 2015) <sup>79</sup>	UNDP AND IPS: A POLICY OF ENGAGEMENT (ALIGNED WITH UNDP SES 6) <sup>80</sup>
General policy	<ul style="list-style-type: none"> <li>• Self-determination</li> <li>• IPs' self-identification</li> <li>• Right to nationality</li> <li>• State government's responsibilities</li> <li>• Human rights and no discrimination</li> <li>• IPs' cultural safeguarding and</li> </ul>	<p>Core principles refer to:</p> <ul style="list-style-type: none"> <li>• Self-determination:<sup>81</sup> the right of IPs to freely pursue their economic, social and cultural development</li> <li>• IPs are entitled to live in accordance with the traditions and the customs that underlie their integrity and way of life and are in compliance with universal principles of human rights</li> <li>• Collective rights: specific histories, languages, identities and cultures, recognition of their collective</li> </ul>	<p>In Indigenous issues for UNDP support:</p> <ul style="list-style-type: none"> <li>• Indigenous Peoples look for assistance in the recognition of the right to self-determination as defined in the United Nations International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights. By virtue of that right, they freely "determine their political status and freely pursue</li> </ul>

<sup>79</sup> See Food and Agriculture Organization of the United Nations (2015).

<sup>80</sup> SES stands for social and environmental standard. See United Nations Development Programme (2017).

<sup>81</sup> "Self-determination" refers to the right to decide the kind of development that takes place among IPs and on their lands and territories, in accordance with their own priorities and conceptions of well-being.

STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	FAO POLICY ON INDIGENOUS AND TRIBAL PEOPLES (2 <sup>ND</sup> ED., 2015) <sup>79</sup>	UNDP AND IPs: A POLICY OF ENGAGEMENT (ALIGNED WITH UNDP SES 6) <sup>80</sup>
	protection <ul style="list-style-type: none"> <li>• Respect of customary practices</li> <li>• Autonomy and self-determination</li> <li>• IPs subject to state laws</li> </ul>	rights to the lands, territories and natural resources they have traditionally occupied and used	their economic, social and cultural development”. <sup>82</sup> <ul style="list-style-type: none"> <li>• UNDP promotes the recognition of Indigenous rights to lands, territories and resources; laws protecting Indigenous lands; and the inclusion of IPs in key legislative processes.<sup>83</sup></li> </ul>
General provisions	<ul style="list-style-type: none"> <li>• Implementation of Convention having regard to country conditions</li> <li>• No impact on other rights and benefits</li> <li>• Recognition and enforcement of treaties</li> </ul>		
Governance and economic development	<ul style="list-style-type: none"> <li>• Right, without discrimination (for example, due to gender, age, disability), to the improvement of their economic and social conditions</li> <li>• FPIC</li> <li>• Consultation</li> <li>• Just and fair conflict resolution</li> <li>• Inclusion in decision-making at</li> </ul>	Core principles refer to: <ul style="list-style-type: none"> <li>• “Development with identity”: IPs’ sociocultural expressions, values and traditions should not be threatened by the development process.<sup>84</sup></li> <li>• The principle and right of FPIC demands that states and organizations of all kinds and at all levels obtain IPs’ authorization before adopting and implementing projects, programmes or legislative and administrative measures that may affect them. Using the FPIC mechanism, IPs’ communities can either provide or</li> </ul>	In Indigenous issues for UNDP support: <ul style="list-style-type: none"> <li>• Environment and sustainable development: many IPs seek the recognition, support and development of sustainable communities based on their own cosmovision – a balance between land, nature, people and spirit.</li> </ul> Priority areas for engagement: <ul style="list-style-type: none"> <li>• Incorporating the “right to development”, UNDP fosters the full participation of IPs in its development processes and the incorporation of</li> </ul>

<sup>82</sup> As clearly expressed in the 1970 Declaration on Principles of International Law concerning Friendly Relations and Cooperation among States in accordance with the Charter of the United Nations (United Nations, 1970) and the United Nations Declaration of the Rights of Indigenous Peoples (United Nations Office of the High Commissioner for Human Rights, 2007), self-determination “shall not be construed as authorizing or encouraging any action that would impair the territorial integrity or political unity of sovereign and independent states”.

<sup>83</sup> “The UNDP Human Rights Policy recognizes the rights of distinct peoples living in distinct regions to self-determined development and control of ancestral lands. This embraces a concept of development that incorporates indigenous peoples’ own aspirations, spirituality, culture, social and economic aims.” (United Nations Development Programme, 2001)

<sup>84</sup> According to FAO, “Identity is of fundamental importance to indigenous peoples, who see their livelihood security, well-being and dignity as being inextricably linked with the continuation of their traditions and the preservation of their ancestral lands and territories. Indigenous peoples have differing conceptions of what constitutes ‘poverty’ and ‘wellbeing.’ According to many of them, wellbeing is a multidimensional condition defined by a range of human experiences, including social, mental, spiritual and cultural welfare. Relatedly, poverty cannot be defined only in terms of material standards; one is poor not only when resources are low, but also when one is unable to live a desired lifestyle. For this reason, indigenous peoples advocate a holistic view of development and livelihood security that transcends models based solely on conventional economic criteria” (Food and Agriculture Organization of the United Nations, 2015).

STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	FAO POLICY ON INDIGENOUS AND TRIBAL PEOPLES (2 <sup>ND</sup> ED., 2015) <sup>79</sup>	UNDP AND IPS: A POLICY OF ENGAGEMENT (ALIGNED WITH UNDP SES 6) <sup>80</sup>
	all levels • RtOD	negate consent. • Legitimate consultation measures ensure that activities or actions planned respond to IPs' concerns and interests, thereby allowing a self-determined development process. • IPs should be included as competent and legitimate stakeholders in projects or initiatives that enter their sphere of existence.	Indigenous perspectives in development planning and decision-making. • UNDP promotes and supports the right of IPs to free, prior and informed consent with regard to development planning and programming that may affect them.
Lands and territories	• Cultural importance of lands • Rights of ownership and usufruct rights • Rights to benefit from natural resources • Right to remain on land • Rights to transmit ownership to next generation • Laws against non-IPs' incursion • Inclusion in agrarian development	IPs are entitled to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those that they have otherwise acquired, as stated in article 26(1) of UNDRIP.	Priority areas of engagement: • UNDP promotes the recognition of Indigenous rights to lands, territories and resources; laws protecting Indigenous lands; and the inclusion of IPs in key legislative processes. • UNDP Human Rights Policy recognizes the rights of distinct peoples living in distinct regions to self-determined development and control of ancestral lands.
Labour, employment, training	• Effective protection of conditions and no discrimination • Equal opportunities • Voluntary participation • Respect and support of cultural livelihood activities	Creating income-generating opportunities and building long-term capacities for stable rural employment for self-determined development	
Social security and health	• Access to social security without discrimination • Appropriate health care		
Education,	• Equal opportunities of access to	Priority areas of work include:	• Indigenous cultures comprise a heritage of

STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	FAO POLICY ON INDIGENOUS AND TRIBAL PEOPLES (2 <sup>ND</sup> ED., 2015) <sup>79</sup>	UNDP AND IPs: A POLICY OF ENGAGEMENT (ALIGNED WITH UNDP SES 6) <sup>80</sup>
communications and knowledge	<p>all IPs at all levels</p> <ul style="list-style-type: none"> <li>• Address special needs</li> <li>• Respect for histories, knowledge and expertise</li> <li>• Education and communications in own language</li> </ul>	<ul style="list-style-type: none"> <li>• Access to information, combined with the preservation of traditional skills and knowledge systems, can bring novel solutions to food insecurity, providing effective avenues for sustainable development</li> <li>• Active engagement of IPs in producing knowledge on Indigenous food and livelihood systems</li> </ul> <p>Food and Agriculture Organization of the United Nations (2024) states that, “FAO respects and values indigenous peoples’ knowledge. This includes ensuring the exchange of traditional and academic knowledge, ensuring the transfer of data and mutual, cross-cultural respect. In particular, it promotes the co-creation of knowledge, blending scientific and indigenous peoples’ knowledge systems, considering both with the same level of respect and consideration.”</p>	<p>diverse knowledge and ideas that is a resource for the whole world, but are often unable to take advantage of their most distinctive asset, their local knowledge, at the same time that it is increasingly being commercialized by international enterprises under the protection of a global patent regime.</p> <ul style="list-style-type: none"> <li>• UNDP has supported innovative projects under the Indigenous Knowledge Programme, whose main objective was to promote Indigenous knowledge through targeted capacity-building and direct support for projects formulated and implemented by IPs and their organizations.</li> <li>• Emphasizes the need to consider collective rights to knowledge and resources, the need for prior, informed consent for their use – consent not just of governments, but of Indigenous communities – and the need for transparency in research outcomes.<sup>85</sup></li> </ul>
Contacts and cross-border cooperation	Governments facilitate contacts and cooperation across borders.		
Right of access to financial support	Right of access to financial and technical assistance from States and through international cooperation.	Collaboration in resource mobilization – non-governmental organizations/FAO programmes; United Nations funding; government funding; technical cooperation; TeleFood campaign.	
Capacities for dialogue and administration of measures	<ul style="list-style-type: none"> <li>• Government agencies and AEs able to carry out functions</li> <li>• IPs and IPOs able to dialogue with state agencies and other organizations</li> </ul>	The UNDP <i>Guidelines on Indigenous Peoples’ Issues</i> offer one basis for improving such an engagement; they exist precisely to guide the integration of IPs’ issues into project cycles and strategies and should therefore be applied more consistently by FAO staff.	

<sup>85</sup> UNDP policy states that “Projects that gather and use indigenous customary knowledge should include measures that promote the recognition of this knowledge as intellectual and cultural property, as well as measures that prevent the dissemination of this knowledge without prior informed consent of the proprietors. Indigenous women must be involved in such activities as they are predominantly the custodians of that knowledge and often the most unlikely to benefit from the project and/or any potential benefit-sharing.” (Global Environment Facility, 2012)

STANDARD ASPECTS	AREAS INCLUDED IN STANDARD	FAO POLICY ON INDIGENOUS AND TRIBAL PEOPLES (2 <sup>ND</sup> ED., 2015) <sup>79</sup>	UNDP AND IPS: A POLICY OF ENGAGEMENT (ALIGNED WITH UNDP SES 6) <sup>80</sup>
Additional aspects			UNDP seeks to understand the underlying causes of conflict (such as social exclusion; control over resources and resource use; violation of rights, including cultural and linguistic; discrimination; inequality; and citizenship) to engage in conflict-prevention strategies; facilitate conflict resolution and peacebuilding (when invited to do so); and assist in the rehabilitation and reintegration of returnees and war-affected peoples.
Instruments for policy implementation		<ul style="list-style-type: none"> <li>• FAO contributes to the formulation of international instruments that take into account IPs' rights.</li> <li>• FAO assistance to government policies and programmes that provide direct support to IPs already exists and offers a good foundation for future work.</li> <li>• Information-sharing and analysis; awareness-raising; communication and data-collection; research with IPs; policy dialogue and normative work; field programmes – capacity development for IPs.</li> </ul>	

Source: IIED evaluation team

## Annex 4. MAINSTREAMING INDIGENOUS PEOPLES' ISSUES IN GCF – INTERNAL COHERENCE

The GCF has taken several measures to integrate IPs' issues across multiple aspects of its programming and operations.<sup>86</sup> These measures reflect a commitment to address IPs' concerns, particularly through the policy provisions that span the GCF safeguarding system and broader policy framework.

- **Interim environmental and social safeguards (2014):** GCF adopted the interim environmental and social safeguards to identify, measure and mitigate environmental and social risks based on the IFC standards. Part of the broader performance standards is Performance Standard 7 that specifically addresses the rights and interests of IPs (Green Climate Fund, 2014).
- **Gender policy (2015, revised 2019):** The policy integrates IPs' concerns, reflecting GCF's commitment to upholding the rights of IPs while promoting a gender-sensitive approach in its processes and operations. It highlights Indigenous women's unique roles and ensures their inclusion in GCF operations (Green Climate Fund, 2019b).
- **Revised environmental and social policy (ESP) (2018, revised 2021):** The revised ESP policy commits the GCF to protecting IPs' rights by avoiding adverse impacts on their communities. Where avoidance is not possible, measures will be taken to minimize, mitigate and compensate for impacts, all while respecting Indigenous culture, rights to lands, territories, resources and traditional knowledge systems (Green Climate Fund, 2021b).
- **GCF IPs Policy (2018):** GCF requires that AEs and DAEs ensure that FPIC is obtained for activities affecting IPs. They must develop, implement, monitor, and continuously improve IPPs and IPPFs to align with GCF IPs Policy. Additionally, AEs and DAEs are responsible for monitoring and reporting on the progress and performance of GCF-financed activities to the GCF and its stakeholders throughout the implementation process, in accordance with the GCF IPs Policy and any relevant IPPs or IPPFs. Finally, AEs and DAEs must establish grievance and redress mechanisms for all GCF-funded activities (Green Climate Fund, 2018a).
- **GCF Ips Policy operational guidelines (2019):** After the adoption of the policy, the GCF Secretariat developed the operational guidelines and streamlined the GCF IPs Policy provision through the GCF project cycle by updating the GCF programming manual, the GCF appraisal guidance and the evaluation procedures (Green Climate Fund, 2019a).
- **ESMS:** The GCF ESMS was updated to incorporate the GCF IPs Policy and the IFC ESS standards (Green Climate Fund, 2017).
- **IPAG (2022):** The GCF established the IPAG to enhance coordination between GCF, AEs, EEs, governments, and IPs.
- **IPs Specialist:** An IPs specialist was also appointed to the Secretariat as the IPs' focal point with operational responsibility to manage the implementation of GCF IPs Policy.
- **IRM (2013, updated TOR 2017) and provisions on IPs:** The Independent Redress Mechanism (IRM) is responsible for addressing grievances related to the GCF IPs Policy. A

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<sup>86</sup> Through a range of policies, guidelines and strategic documents, GCF has ensured that IPs' rights, knowledge and participation are integrated into its climate finance activities.

public database of IPs-related grievances is shared with the IRM, enhancing transparency and accountability.

- **Updated Strategic Plan (2024–2027) (USP-2) and relevant provisions on IPs:** The USP-2 adopted by the GCF Board in 2024 includes provisions for expanding stakeholder engagement with IPs, particularly through the IPAG. It emphasizes significantly expanding deployment of enhanced direct access and other devolved climate-financing approaches to IPs, to advance environmental and social safeguards on IPs' matters and establish a more structured forum for IPs engagement and advice, and aims to achieve a long-term strategic vision for inclusive climate action which integrates IPs (Green Climate Fund, 2023).

While these efforts highlight the GCF's commitment to addressing IPs' concerns, there are specific areas where coherence between policies could be strengthened.

## A. SUMMARY OF KEY FINDINGS

This is especially the case with regard to inconsistent use of terms such as “Indigenous Peoples” alongside broader terms such as “vulnerable” and “disadvantaged” across the different GCF policies. This interchangeable use of the term runs the risk of obscuring the unique rights, cultures and specific historical contexts of Indigenous communities.

The evaluation team also identified differing emphases on meaningful consultations within the IFC ESS, the revised ESP and the GCF IPs Policy. The varying disclosure requirements further exacerbated the inconsistency across policies, leading to a lack of clarity in implementation and potentially marginalizing IPs in decision-making processes.

Further, the evaluation team noted a critical gap in the GCF IPs Policy on issues of transboundary risks. This lack of foresight is particularly concerning given the cascading nature of environmental issues that often transcend state boundaries.

Additionally, the evaluation team noted insufficient integration of the GCF IPs Policy within the revised ESP, which may lead to an inconsistent application of safeguards. Lastly, the team observed differences in implementation arrangements across the GCF IPs Policy and revised ESP, where the revised ESP mandates compliance while the GCF IPs Policy merely expects adherence, which allows AEs to apply their own standards and may result in weaker protections for IPs.

Overall, these findings highlight a need for the GCF to improve the coherence of its policies concerning IPs. Addressing this would foster clear expectations for AEs and enhance the overall effectiveness of GCF's approach to IPs.

## B. INTERNAL COHERENCE CHECK

This section assesses the alignment and coherence of various GCF policies on issues concerning IPs. The primary objective is to assess how well the key terms and definitions specified in the GCF IPs Policy align with those in other relevant GCF policies.

To clarify the scope of this exercise, the evaluation team defines “policy” as it is used here. The team has not addressed Board decisions, strategies, standards or guidelines, which would typically fall under a broader policy taxonomy. The range of policies within the GCF considered for the coherence check are outlined in Box A - 4.1.



**Box A - 4.1. Overview of GCF policies and frameworks considered for internal coherence check**

1. Fiduciary principles and standards
  - 1.1. Initial fiduciary principles and standards
  - 1.2. Policy on prohibited practices
  - 1.3. Policy on protection of whistleblowers and witnesses
2. Environmental and social safeguards policies
  - 2.1. Accreditation standards: interim environmental and social safeguards
  - 2.2. Updated gender policy
  - 2.3. Revised ESP
3. Reporting and evaluation policies
  - 3.1. Integrated results management framework
  - 3.2. Monitoring and accountability framework
  - 3.3. Evaluation policy
4. Investment framework
5. Interim risk and investment guidelines
6. Information disclosure policy

Source: IIED evaluation team

## C. DETAILED KEY FINDINGS

**1. GCF policies inconsistently address IPs, with their specific rights often overshadowed by broader terms such as “vulnerable”. While the term “Indigenous Peoples” is mentioned in key environmental, social and gender-related policies, it is largely absent from critical operational policies. The inconsistency is further compounded by the frequent use of broader terms such as “vulnerable” and “disadvantaged”, which carry distinct meanings. The conflation risks erasing the unique challenges of the IPs, rooted in historical marginalization and requiring specific legal frameworks and consent mechanisms such as FPIC.**

The term “Indigenous Peoples” or “IPs” is mentioned in the context of the GCF’s environmental and social safeguards, gender policy, revised ESP and in the updated Strategic Plan document. However, the term is used sparingly in the GCF’s reporting and evaluation policies – such as the integrated results management framework, monitoring and accountability framework, and evaluation policy – or in 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 also do not find mention in the policies that are applied by the GCF Secretariat at the project level, such as the investment framework, and the interim risk and investment guidelines.

Outside of the environmental and social safeguards policy suite, the more commonly preferred 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, on certain occasions, vulnerable groups within 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.

It is important to clearly differentiate between vulnerable groups and Indigenous groups, as they each carry distinct meanings and policy implications. In GCF policies, vulnerable groups refer to individuals or communities who are disproportionately affected by a project and have limited access to its benefits or decision-making processes.<sup>87</sup> These groups could include a wide range of people, such as those affected by age, family separation, or other local circumstances. In contrast, Indigenous communities, while they may be vulnerable, face vulnerabilities rooted in historical marginalization tied to their land and cultural rights. This requires specific legal frameworks and consultation mechanisms, such as FPIC, which are not generally applicable to other vulnerable groups.

Although there may be some overlap between these categories, they are not equivalent and should not be used interchangeably in GCF policies. Conflating the two runs the risk of erasing the distinct identity and needs of IPs and diluting their rights related to land, sovereignty and culture, recognized by international law. This could also undermine the specific protections and consultation mechanisms essential to safeguarding their rights and status.

**2. GCF IPs Policy, environmental and social safeguards and revised ESP all commit to meaningful consultation but differ in emphasis. The GCF IPs Policy prioritizes meaningful consultation to inform project design, while the environmental and social safeguards focuses on risk identification and limiting engagement to only directly affected communities. The revised ESP underscores cultural appropriateness and gender inclusivity, which are less emphasized in the other two policies. Additionally, there are discrepancies in documentation and disclosure requirements across the GCF IPs Policy, revised ESP and the environmental and social safeguards standards, raising concerns about the consistency of the meaning of “meaningful consultations” across GCF projects.**

While the GCF IPs Policy, environmental and social safeguards and revised ESP largely align in their commitment to consultation, there are subtle differences in emphasis and intent. Additionally, there are some discrepancies in disclosure requirements, which raises concerns about the alignment of these policies and the consistency of handling meaningful consultations across GCF projects.

In the GCF IPs Policy, the emphasis on meaningful consultation is to inform project design and engagement through stakeholder feedback and environmental and social risk management. However, in the environmental and social safeguards, the emphasis on effective consultation is on risk and impact identification.

Moreover, the GCF IPs Policy advocates an ongoing and inclusive engagement throughout the project cycle, while the environmental and social safeguards emphasizes engagement only with directly affected communities, with a focus on risk and impacts. Additionally, the revised ESP underscores the principles of meaningful consultation, reiterating the significance of cultural appropriateness and gender inclusivity, although the latter is not explicitly emphasized in the definition in the GCF IPs Policy and environmental and social safeguards. Lastly, there is also variation in the documentation and disclosure requirements within the framework of meaningful consultation. While the GCF IPs Policy mentions documentation and disclosure of the consultation process, environmental and social safeguards only speaks of documentation and the revised ESP mandates public disclosure of key documents for a minimum 30-day period.

**3. The GCF IPs Policy and revised ESP align in their understanding of environmental and social assessment, both emphasizing the assessment of environmental and social risks, impacts**

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<sup>87</sup> IPs Policy (Green Climate Fund, 2018a, para. 9(e)); revised ESP (Green Climate Fund, 2021b, para. 2(f)); Gender Policy (Green Climate Fund, 2019b, para. 17).

**and opportunities.<sup>88</sup> The key difference between the two policies is in the consideration of transboundary risks and impacts.** The revised ESP broadens the scope of assessment to include potential risks and impacts that extend beyond national borders, while the GCF IPs Policy does not explicitly address this aspect. This divergence highlights the need for a more comprehensive approach to assessing risks that could affect Indigenous communities across borders.

**4. The GCF's environmental and social safeguards include provisions for IPs through Performance Standard 7 and are referenced as critical to the ESMS in the revised ESP. However, the GCF IPs Policy, which sets a higher standard than environmental and social safeguards (Independent Evaluation Unit, 2020), is only briefly mentioned in the revised ESP. This lack of explicit reference is concerning as the revised ESP is meant to guide the integration of environmental and social consideration into GCF's decision-making. Consequently, the lack of explicit integration of the GCF IPs Policy within the revised ESP could lead to inconsistent application of environmental and social safeguards across GCF projects.**

The GCF's environmental and social safeguards are anchored in the IFC performance standards, which include a dedicated standard for the protection of IPs (Performance Standard 7). environmental and social safeguards are also referenced in the revised ESP as a critical element of the GCF-wide ESMS. However, the GCF IPs Policy, which sets a higher standard on IPs than the GCF environmental and social safeguards (Performance Standard 7) (Independent Evaluation Unit, 2020), lacks sufficient prominence in the revised ESP. The GCF IPs 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 revised 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, 2021b, para. 1), this lack of explicit reference to the GCF IPs Policy is concerning. The paragraph on “coherence and links with relevant policies and practices within GCF” also fails to directly address the GCF IPs Policy (Green Climate Fund, 2021b, para. 8(g)).

**5. The GCF's revised ESP has specific implementation requirements governed through the ESMS. In contrast, the GCF IPs Policy lacks explicit implementation arrangements, only expecting AEs to meet its requirements rather than requiring compliance. The difference in implementation arrangements allows AEs to apply their own standards, potentially leading to weaker protection for IPs.**

The revised ESP clearly states that it is an essential part of the GCF ESMS, with its implementation governed through the processes and procedures of the ESMS (Green Climate Fund, 2021b, para. 82). In contrast, the implementation arrangements of the GCF IPs Policy are less explicitly outlined. The GCF IPs Policy is positioned as both supporting existing policies and practices of GCF – particularly those related to the management of environmental and social risks and impacts – and supplementing the GCF environmental and social safeguards standard on IPs, the gender policy and other relevant policies.

The key difference between the revised ESP and GCF IPs Policy lies in the language around implementation (see, for example, Table A - 4.1 and Table A - 4.2). While the former explicitly requires AEs to implement it, the GCF IPs Policy only expects AEs to meet its requirement. This distinction allows AEs to use their own standards on IPs, as long as they meet the GCF IPs Policy

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<sup>88</sup> Revised ESP (Green Climate Fund, 2021b, para. 2(j)); IPs Policy (Green Climate Fund, 2018a, para. 9(f)).

criteria, where necessary. In practice, this leads to “compliance assessments” by the GCF to ensure alignment, which often results in delays during the technical review and appraisal stage of the project. Additionally, the burden of these compliance assessments on the former Office of Sustainability and Inclusion increases the risk of the GCF IPs Policy being deprioritized in favour of weaker AE standards. This may open the door to potential inconsistencies, where the stronger safeguards of the GCF IPs Policy may be side stepped in practice (Bertilsson and Soneryd, 2023).

**Table A - 4.1. Varied definitions of ‘meaningful’ and ‘effective’ consultation in the revised ESP, GCF IPs Policy and environmental and social safeguards standards**

DEFINITION OF MEANINGFUL CONSULTATION IN GCF IN THE REVISED ESP	DEFINITION OF MEANINGFUL CONSULTATION IN GCF IPs POLICY	DEFINITION OF EFFECTIVE CONSULTATION IN GCF ENVIRONMENTAL AND SOCIAL SAFEGUARDS STANDARDS
<p>“GCF will require and ensure that the meaningful consultation will be culturally appropriate, undertaken throughout the life cycle of activities, with information provided and disclosed in a timely manner, in an understandable format, in appropriate local languages, free from coercion, and will incorporate the views of stakeholders in the decision-making process. The processes will pay particular attention to vulnerable groups and to conducting consultations in a manner that does not put vulnerable individuals and groups at risk. For activities impacting indigenous peoples, this engagement will be supported by the objectives and requirements of the GCF ESS* standards and relevant GCF policies, including but not limited to, the GCF Indigenous Peoples Policy, including with respect to free, prior and informed consent.”</p> <p>Green Climate Fund (2021b, para. 72).</p>	<p>“A two-way process, that: (a) begins early in the project planning process to gather initial views on the project proposal and inform project design; (b) encourages stakeholder feedback, particularly as a way of informing project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts; (c) continues on an ongoing basis, as risks and impacts arise (d) is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a time frame that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders; (e) considers and responds to feedback; (f) supports active and inclusive engagement with project-affected parties; (g) is free of external manipulation, interference, coercion, discrimination, and intimidation; and (h) is documented and disclosed.”</p> <p>Green Climate Fund (2018a, para. 9(m)).</p>	<p>“Effective consultation is a two-way process that should: (i) begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise; (ii) be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to affected communities; (iii) focus inclusive engagement on those directly affected as opposed to those not directly affected; (iv) be free of external manipulation, interference, coercion, or intimidation; (v) enable meaningful participation, where applicable; and (vi) be documented.”</p> <p>ESS* Performance Standard 1, International Finance Corporation (2012, para. 30).</p>

Source: IIED evaluation team

Note: \*ESS in the table refers to environmental and social safeguards.

**Table A - 4.2. Definition of 'Indigenous Peoples' and 'disadvantaged or vulnerable' groups in GCF IPs Policy and revised ESP**

DEFINITION OF IPS IN THE GCF IPs POLICY	DEFINITION OF DISADVANTAGED OR VULNERABLE GROUPS IN THE GCF IPs POLICY	DEFINITION OF DISADVANTAGED OR VULNERABLE GROUPS IN THE REVISED ESP
<p>"This GCF Indigenous Peoples Policy recognizes that indigenous peoples often have identities and aspirations that are distinct from mainstream groups in national societies and are disadvantaged by traditional models of mitigation, adaptation and development. In many instances, they are among the most economically marginalized and vulnerable segments of the population. The economic, social and legal status of indigenous peoples frequently limit their capacity to defend their rights to, and interests in, land, territories and natural and cultural resources, and may restrict their ability to participate in and benefit from development initiatives and climate change actions. In many cases, they do not receive equitable access to project benefits, or benefits are not devised or delivered in a form that is culturally appropriate, and they are not always adequately consulted about the design or implementation of activities that would profoundly affect their lives or communities."</p> <p>Green Climate Fund (2018a, para. 3).</p>	<p>"Those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and circumstances where they may be separated from their family, the community or other individuals upon which they depend."</p> <p>Green Climate Fund (2018a, para. 9(e)).</p>	<p>"Those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so."</p> <p>Green Climate Fund (2021b, para. 2(f)); Green Climate Fund (2019b, para. 21).</p>

Source: IIED evaluation team

## Annex 5. FPIC DOCUMENTATION IN INDIGENOUS PEOPLES-RELEVANT PROJECTS

*Table A - 5.1. FPIC documentation in IPs-relevant projects*

FP	COUNTRY LIST	AEs	EES	LEVEL OF FPIC DOCUMENTATION <sup>89</sup>
FP050	Bhutan	WWF	Ministry of Agriculture and Forests (Bhutan)	Partial
FP056	Colombia	UNDP	Fondo Adaptación	Complete
FP062	Paraguay	FAO	FAO	Complete
FP089	El Salvador	FAO	FAO, Ministry of Agriculture and Livestock of El Salvador, Ministry of the Environment and Natural Resources of El Salvador, Fondo de Inversión Ambiental of El Salvador	Complete
FP100	Brazil	UNDP	UNDP	Complete
FP101	Belize	IFAD	Ministry of Economic Development (Belize), Ministry of Finance (Belize)	Complete
FP109	Timor-Leste	UNDP	Ministry of Commerce, Industry and Environment (Timor-Leste)	Complete
FP110	Ecuador	UNDP	Ministry of Environment, Water and Ecological Transition (Ecuador)	Complete
FP113	Kenya	IUCN	Ministry of Agriculture and Irrigation (Kenya), National Drought Management Authority (Kenya), Conservation International Foundation	Partial
FP117	Lao People's Democratic Republic (the)	GIZ	GIZ, Government of Lao PDR, Japan International Cooperation Agency	Complete
FP118	Nepal	FAO	Ministry of Forests and Environment (Nepal), FAO	Partial
FP121	Paraguay	UNEP	Ministry of Environment and Sustainable Development (Paraguay)	Partial
FP137	Ghana	UNDP	Forestry Commission of Ghana	Partial
FP143	Brazil	IFAD	Brazilian Development Bank	Partial
FP144	Costa Rica	UNDP	UNDP	Partial
FP145	Guatemala	FAO	FAO, Ministry of Agriculture, Livestock and Food (Guatemala), National Forest Institute, GIZ	Complete

<sup>89</sup> The evaluation team could not locate relevant information on FPIC for all IPs-relevant projects, except for the ones presented in this table. It remains inconclusive as to whether the documents do not exist or were simply difficult to access.

FP	COUNTRY LIST	AEs	EES	LEVEL OF FPIC DOCUMENTATION <sup>89</sup>
FP158	Botswana	CI	Conservation International Foundation	Complete
FP162	Burkina Faso, Chad, Gambia (the), Mali, Mauritania, Niger (the), Senegal	IFAD	IFAD, AfDB, Africa Risk Capacity Group, World Food Programme	Complete
FP177	Bangladesh, El Salvador, Kenya, Malawi, North Macedonia, Panama, Sao Tome and Principe, Somalia, Sri Lanka	World Bank	Ministry of Health (Sao Tome and Principe), Ministry of Power (Sri Lanka), Ministry of Health and Human Services (Somalia), Ministry of Power, Energy and Mineral Resources (Bangladesh), Ministry of Health (El Salvador), Ministry of Energy and Petroleum (Kenya), Ministry of Industry, Trade and Tourism (Malawi), Ministry of Economy (North Macedonia), Ministry of the Presidency (Panama)	Partial
FP200	Lao People's Democratic Republic (the)	GIZ	GIZ, Ministry of Agriculture and Forestry, Ministry of Natural Resources and Environment (Lao PDR), Environment Protection Fund	Complete
FP201	Philippines (the)	FAO	FAO, Department of Agriculture (the Philippines), Philippine Atmospheric, Geophysical and Astronomical Services Administration, Philippine Bureau of the Treasury	Partial
FP202	Bolivia (Plurinational State of)	FAO	FAO, Ministry of Environment and Water (Bolivia), Federation of Municipalities (Bolivia)	Complete
FP203	Colombia	WWF	Patrimonio Natural, World Wide Fund for Nature (Colombia)	Partial
FP204	Ethiopia, Guinea-Bissau, Indonesia, Kyrgyzstan, Mongolia, Seychelles, Somalia, Tajikistan, Tunisia	World Bank	Ministry of Finance (Ethiopia), Ministry of Economy and Finance (Guinea Bissau), Ministry of Finance (Mongolia), Ministry of Finance (Indonesia), Ministry of Finance (Seychelles), Ministry of Finance (Somalia), Ministry of Finance (Tajikistan), Ministry of Development, Investment and International Cooperation (Tunisia)	Partial
FP207	Pakistan	WWF	WWF Pakistan	Partial



FP	COUNTRY LIST	AEs	EES	LEVEL OF FPIC DOCUMENTATION <sup>89</sup>
FP214	Thailand	GIZ	Rice Department of the Ministry of Agriculture and Cooperatives (Thailand), Bank for Agriculture and Agricultural Cooperatives (Thailand), Ministry of Natural Resources and Environment (Thailand), International Rice Research Institute (IRRI), GIZ	Partial
FP220	Kenya, Rwanda, Tanzania, Uganda	IFAD	Equity Bank (Kenya) Limited, IFAD	Partial
FP232	Jordan	UNEP	Ministry of Environment, IUCN	Partial
FP234	Tonga	UNDP	UNDP	Complete
FP235	Ecuador	CI	Conservation International Foundation	Partial
FP236	Mexico	IFAD	National Forestry Commission of Mexico (CONAFOR), Nacional Financiera, Banca de Desarrollo, Ministry of Finance and Public Credit	Partial
FP238	Malawi	FAO	FAO, Ministry of Agriculture, Ministry of Finance and Economic Affairs, National Local Government Finance Committee (NLGFC)	Partial

Source: IIED evaluation team, data extracted from FPs folder.

## Annex 6. ANALYSIS OF FUNDED ACTIVITIES AGREEMENT CONDITIONS

The evaluation team found that **the implementation of FAA conditions related to the GCF IPs Policy has increased significantly since the policy's approval, with a tendency to grant conditions related to specific policy requirements, rather than general text referring to the GCF IPs Policy. While general FAA conditions often correlate with lower compliance, specific conditions related to FPIC, the grievance redress mechanism (GRM), IPPs and IPPFs seem to improve adherence to policy requirements. Additionally, the evaluation revealed that public-sector projects are more likely to include IPs-related conditions than private-sector projects. This finding is notable, as it contrasts with insights from key informants who identified private-sector projects as most in need of improved safeguarding practices for IPs.**

The evaluation team found 79 projects with FAA conditions addressing IPs, most of which were attached to FAAs granted after the approval of the GCF IPs Policy. The first project with an IPs-related FAA condition, FP061, was approved at the nineteenth meeting of the Board (B.19) in 2018, shortly after the Policy's adoption, indicating that the Policy was operational almost immediately.<sup>90</sup>

Four projects received IPs-related FAA conditions before the policy's approval, focusing on IPs' consent or FPIC, resettlement plan development and IPPF requirements. A marked increase in such conditions followed the Policy's approval. However, of the 75 projects with conditions attached to FAAs during or after B.19, only 28 include conditions related to the general application of the Policy. The remainder specify requirements for specific policy elements, such as FPIC, GRM, IPP, or IPPF, which are already covered by the Policy, suggesting this level of detail may be redundant.

Interestingly, projects with only general FAA conditions tend to demonstrate lower compliance: just two have completed FPIC documentation, three have a complete IPP and one has a complete IPPF. This suggests that greater specificity in FAA conditions may enhance policy effectiveness.

Additionally, the evaluation revealed notable differences between private- and public-sector projects in terms of FAA conditions. The private sector shows a predominance of "No" responses (14 out of 20), indicating that few private entities include an "IPs' condition". By contrast, the public sector displays a stronger representation of "Yes" responses (73 out of 100).

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<sup>90</sup> 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." Available at [www.greenclimate.fund/project/fp061](http://www.greenclimate.fund/project/fp061).

**Box A - 6.1. Statistical evidence of differences in conditions between private and public sectors**

The Chi-squared statistic ( $X^2=6.2316$ ) and the corresponding p-value (0.02155) demonstrate that the distribution of responses (Yes/No for the IPsP Condition) differs significantly between the private and public sectors. Since the p-value is less than the threshold 0.05, we reject the null hypothesis, which posits that there is no association between the two variables. The results indicate a significant difference between the private and public sectors concerning the “IPsP condition”.

```
> private_vs_public

      Private Public
No       18      61
Yes        2      39
> round(prop.table(private_vs_public), digits = 2)

      Private Public
No       0.15    0.51
Yes      0.02    0.32
> private_vs_public_chi

      Pearson's Chi-squared test

data:  core_conditions$IPP.condition and core_conditions$Sector
X-squared = 6.2316, df = 1, p-value = 0.02155
> |
```

Source: IIED evaluation team compilation, FAA extraction from iPMS.

## Annex 7. ANALYSIS OF INDIGENOUS PEOPLES PLANNING FRAMEWORKS AND INDIGENOUS PEOPLES PLANS

The evaluation team found that **there is significant variability in the quality and content of IPPs and IPPFs, highlighting a need for clearer guidance and established minimum standards to ensure consistency and effectiveness in meeting policy requirements. Only 73 IPs-related projects have an IPP or IPPF and around half of these documents are merely general outlines. The Policy offers only key elements without providing templates or clear guidance on minimum standards or best practices, leaving AEs responsible for developing comprehensive IPPs and IPPFs. AEs often lack clarity about the distinct purposes of these two instruments and many projects have only one of the required documents, even when policy mandates both. Consequently, AEs with robust IPs policies tend to produce well-developed documents, while others provide basic outlines that lack project- or IPs-specific details. Most documents are inadequate for monitoring compliance with the GCF IPs Policy; IPPs are typically broad overviews rather than specific plans for IPs and project sites, and IPPFs generally do not identify project sites to support the creation of more detailed IPPs.**

The GCF IPs Policy and its operational guidelines introduce two primary instruments for monitoring compliance with the policy and promoting respect for IPs' rights: the IPP and the IPPF. According to the Policy, the IPP outlines actions to minimize and/or compensate for adverse impacts on IPs and identifies opportunities to enhance positive impacts of a project in a culturally appropriate manner. Conversely, the IPPF provides an overview of processes and plans to ensure that specific activities align with this policy, as well as with the GCF ESP and environmental and social safeguard standards.

IPPs and IPPFs serve distinct functions: IPPs are required when specific activities or locations are defined and when IPs are not the sole beneficiaries of these activities. In contrast, IPPFs provide a general framework describing processes and plans to ensure compliance with the GCF IPs Policy and include guidelines for developing and implementing site-specific IPPs. The role of the IPPF is to identify sub-projects that require more detailed IPPs; however, only five IPPFs include information on the types of sub-projects involved.

The GCF IPs Policy, however, lacks clarity on compliance requirements related to IPPs and IPPFs, using broad and open-ended language that grants AEs considerable discretion in deciding when and how to develop and use these tools. Instead of providing templates or minimum standards for the development of IPPs and IPPFs, the operational guidelines list only key elements for each document type.

The evaluation team analysed all IPPs and IPPFs in GCF records and found that 73 projects (63 per cent) include at least one of the two documents (see Table A - 7.1, Table A - 7.2 and Table A - 7.3). Of these, 36 are general outlines, while 37 contain information relevant to the key elements of IPPs and IPPFs:

- Only 37 IPPs/IPPFs (31 per cent) include information specific to project sites or IPs who might be impacted by GCF-funded activities. Among these, 11 are IPPs and 26 are IPPFs.
- The 26 IPPFs with project site- and IPs-specific information vary in quality; some are very detailed and even include information related to key elements of IPPs.

- The 22 documents recorded as IPPs are simple outlines with standard, vague information that could apply to any context. Given the IPP's intended function to identify specific IPs and project site information, these documents do not meet the criteria for IPPs.
- All 11 IPPs analysed contain information on engagement plans; most include baseline information (9), measures to avoid, minimize and mitigate impact (8), benefit-sharing plans (7) and consultation outcomes. However, many lack details on key elements such as CBNRM, M&E, budgets and timelines.
- Several IPPs contain information relevant to key elements of IPPFs and the reverse is also true.
- AEs identified in the benchmarking exercise as having strong IPs policies have produced comprehensive IPPs and IPPFs, while most others lack sufficient information.
- No projects were found to have both an IPPF and an IPP. Projects listed as having both typically contain only IPP outlines alongside their IPPFs.

*Table A - 7.1. IPP and IPPF definitions in GCF IPs Policy and operational guidelines*

ELEMENT	IPP	IPPF
GCF IPs Policy definition (Green Climate Fund, 2018a)	<p>“IPP outlines the actions to <b>minimize and/or compensate for the adverse impacts and identify opportunities and actions</b> to enhance the positive impacts of a project for indigenous peoples in a culturally appropriate manner. Depending on local circumstances, a free-standing IPP may be prepared or it may be a component of a broader community development plan”.</p> <p>Where there are <b>potential impacts</b> on IPs, AEs with IPs will prepare an <b>IPP</b>.</p> <p>When IPs are the sole, or constitute the overwhelming majority of, beneficiaries of GCF-financed activities, the elements of the IPP will be included in the overall design and the environmental and social management plans in relation to environmental and social due diligence of the GCF-financed activities. The preparation of a stand-alone IPP or IPPF will not be necessary.</p> <p>When IPs are <b>not</b> the only beneficiaries of the activities, the <b>AEs will prepare</b> a time-bound plan, such as an IPP, setting out the measures or actions proposed. In some circumstances, a <b>broader integrated community development plan</b> will be prepared, addressing all beneficiaries of the GCF-financed activities and incorporating necessary information relating to the affected IPs. A community development plan may be appropriate in circumstances where other people, in addition to the IPs, will be affected by the risks and impacts of the GCF-financed activities; where more than one IPs group is to be included; or where the regional or national scope of a programmatic project incorporates other population groups.</p>	<p>Where there are potential impacts on IPs, AEs will prepare an IPPF, <b>if specific activities or locations have not yet been determined</b>. The <b>scope and scale</b> of the IPPs or IPPFs will be proportionate to the potential risks and impacts of the project. The IPPFs will include a <b>description of the processes and plans</b> so that specific activities meet the requirements of this policy and the GCF ESP and environmental and social safeguard standards, including provisions for the development and implementation of site-specific IPPs that meet the requirements of this policy.</p>

ELEMENT	IPP	IPPF
GCF IPs Policy operational guidelines (Green Climate Fund, 2019a)	<p><b>Where potential impacts on IPs have been identified</b>, AEs, in consultation with IPs, will prepare an IPP.</p> <p>AEs, including through their EEs, should work with IPs to prepare an IPP outlining the actions to avoid, minimize and/or compensate for adverse impacts in a culturally appropriate manner. Depending on local circumstances, a stand-alone IPP may be prepared, or it may be a component of a broader community development plan where IPs exist in the same area with other similarly affected communities or where IPs are integrated within a larger affected population.</p> <p>The IPP is prepared in a flexible and pragmatic manner, and its level of detail varies depending on the specific project and the nature of the effects to be addressed.</p>	<p>Where the activities consist of projects or subprojects where IPs may be present, an IPPF will have to be prepared. The purpose of the IPPF is to <b>clarify the principles, organizational arrangements and design criteria</b> to be applied to subprojects or project components to be prepared during project implementation when IPs may be present in or have a collective attachment to the project area.</p> <p><b>Following identification of the subproject</b> or individual project components and confirmation that IPs are present in or have a collective attachment to the project area, <b>a specific IPP</b>, proportionate to potential risks and impacts, is prepared. <b>Project activities that may affect IPs must not commence until such specific plans are finalized and approved by GCF.</b></p>
Elements of plan or framework	<p>In general, and where appropriate, an IPP should include the following elements:</p> <ul style="list-style-type: none"> <li>• Baseline information</li> <li>• Key findings and analysis of impacts, risks and opportunities</li> <li>• Measures to avoid, minimize and mitigate negative impacts and enhance positive impacts and opportunities</li> <li>• CBNRM</li> <li>• Result of consultations</li> <li>• Benefit-sharing plans</li> <li>• Tenure arrangements</li> <li>• Grievance redress mechanism</li> <li>• Costs, budget, timetable and organizational responsibilities</li> <li>• Monitoring, evaluation and reporting</li> </ul>	<p>The IPPF sets out:</p> <ul style="list-style-type: none"> <li>• The types of subprojects likely to be proposed for financing under the project</li> <li>• The potential positive and adverse impacts of such programmes or subprojects on IPs</li> <li>• A plan for carrying out the assessment for such programmes or subprojects</li> <li>• A framework for ensuring the meaningful consultation of IPs and, in the specified circumstances, a framework for ensuring their FPIC</li> <li>• Institutional arrangements, including capacity-building where necessary, for screening</li> <li>• Project-supported activities, evaluating their effects on IPs, preparing IPPs and addressing any grievances</li> <li>• Monitoring and reporting arrangements, including mechanisms and benchmarks appropriate to the project</li> <li>• Disclosure arrangements for IPPs to be prepared as specified in the IPPF</li> </ul>
Additional policy requirements for inclusion	<ul style="list-style-type: none"> <li>• The plan, implementation and documentation of the process of informed consultation and engagement as well as FPIC, where relevant.</li> <li>• A description of the government-provided entitlements of affected IPs.</li> <li>• The measures proposed to bridge any gaps between such entitlements and the requirements of these guidelines.</li> <li>• The financial and implementation</li> </ul>	<ul style="list-style-type: none"> <li>• The plan, implementation and documentation of the process of informed consultation and engagement as well as FPIC, where relevant.</li> <li>• A description of the government-provided entitlements of affected IPs.</li> <li>• The measures proposed to bridge any gaps between such entitlements and the requirements of these guidelines.</li> <li>• The financial and implementation</li> </ul>

ELEMENT	IPP	IPPF
	responsibilities of the government agency and/or the AE.	responsibilities of the government agency and/or the AE.

Source: IIED evaluation team compilation, IPPs and IPPFs extracted from FPs folder.

**Table A - 7.2. Summary: analysis of IPPs**

KEY ELEMENT	N	%
Baseline and IPs information	9	82%
Benefit-sharing plans	7	64%
CBNRM	6	55%
Budget, timetables and organizational responses	6	55%
Engagement plans, including FPIC	11	100%
Gender assessment and action plans	5	45%
Grievance and redress mechanisms	6	55%
Key findings and analysis of impact	5	45%
M&E	5	45%
Measures to avoid, minimize and mitigate	8	73%
Results of consultations	7	64%
Tenure arrangements	4	36%

Source: IIED evaluation team.

**Table A - 7.3. Summary: analysis of IPPFs**

KEY ELEMENT	N	%
Information on national laws and government entitlements	18	69%
Type of sub-projects	5	19%
Potential positive and adverse impacts	3	12%
Plan for assessment	8	31%
Framework for meaningful consultation	16	62%
Institutional arrangements and capacity-building	15	58%
M&E arrangements	16	62%
Project activities, including IPP and GRM	10	38%
Results of consultations	7	27%
Budget and plans	7	27%

Source: IIED evaluation team.



## Annex 8. ANALYSIS OF RESETTLEMENT PLANS

The evaluation team's analysis of resettlement plans and frameworks for IPs-related projects reveals **significant inconsistencies in quality and applicability, underscoring the need for clearer guidance and standardization.**

Of the 120 IPs-related projects, only 29 (2 per cent) included any resettlement documentation, with the majority (24 projects) providing general outlines that lack project-specific details and only five projects submitting detailed resettlement frameworks.<sup>91</sup> There is no project with a resettlement plan. This variability stems in part from the lack of standardized templates or minimum requirements in the GCF IPs Policy, leaving AEs to create their own formats. While some AEs have developed structured templates or terms of reference, others rely on broader, generic guidelines, often lacking specific contextual information. Additionally, it remains unclear whether or when these plans will be formally implemented as many projects indicate only general intentions, and no actionable steps follow from the broad outlines. Of the 29 projects with resettlement documentation, only eight explicitly reference FPIC and only four out of the five resettlement frameworks include FPIC requirements.

The GCF IPs Policy references resettlement in the context of “involuntary resettlement” of IPs due to project activities. This term is defined broadly within the policy to include both physical displacement (such as relocation, loss of residential land or shelter) and economic displacement (such as loss of land, assets or livelihood sources). Additionally, it encompasses restrictions on land-use imposed by project-related activities. Notably, the policy stipulates that GCF will not fund any project that results in the involuntary resettlement of IPs unless resettlement is deemed unavoidable to meet project and programme objectives. In these exceptional cases, resettlement may proceed if it fulfils several critical conditions, including: (i) obtaining FPIC as per the GCF IPs Policy; (ii) authorization by national law; (iii) compliance with obligations under relevant international treaties and agreements applicable to the state; (iv) due diligence by GCF and the AEs to ensure actions are reasonable and proportional; (v) adherence to GCF's environmental and social safeguards standards, particularly those on involuntary resettlement; and (vi) the establishment of fair compensation, rehabilitation and – if applicable – the right of return (Green Climate Fund, 2018a, para. 61). Additionally, AEs are required to explore alternative project designs and livelihood restoration options to avoid displacing IPs from lands they traditionally own, use or occupy.

The GCF IPs Policy does not explicitly mandate the development of a resettlement plan. The operational guidelines, however, specifies that AEs are responsible for preparing a resettlement action plan/livelihood restoration plan when appropriate. The GCF IPs Policy mentions following standards of due process consistent with GCF's interim environmental and social safeguard standards and other GCF policies on resettlement.

GCF's environmental and social safeguards Performance Standard 5 on land acquisition and involuntary resettlement outlines the need for a resettlement and/or livelihood restoration framework in cases where the specific nature or extent of physical/economic displacement is not yet clear due to the project's developmental stage. Once project details are finalized, this framework is to be expanded into a resettlement plan. Similarly, the revised GCF ESP calls for a resettlement framework for undefined activities and a detailed resettlement action plan when site-specific impacts are known. The ESP also references separate livelihood restoration or compensation plans in cases of economic displacement.

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<sup>91</sup> The team reviewed 120 projects for resettlement plans (cut-off date as of B.39).



The evaluation team analysed the resettlement plans and frameworks submitted for IPs-related projects. Key findings include:

- Of the 120 IPs-related projects, 29 projects (24 per cent) included any form of resettlement documentation.
- Among these, only five provide specific resettlement frameworks, while the remaining 24 consist of general outlines lacking necessary contextual details.
- Even for the 29 projects that include resettlement documentation, it remains unclear whether or when these resettlement frameworks or plans will be formally triggered for implementation.
- There is a lack of a standardized template or format for resettlement plans in the policy which leads to considerable variation in document quality across AEs. Some AEs have developed templates and terms of reference, while others have submitted broad generalized guidelines and guidance documents.
- Of the 29 projects with resettlement documentation, only eight explicitly reference FPIC, a fundamental requirement under the policy.
- Four of the five projects with detailed frameworks include FPIC, while most general outlines merely refer to meaningful consultations, stakeholder engagement or free, prior and informed consultation instead of FPIC.
- Three of the five resettlement frameworks are prepared by government ministries, highlighting the crucial roles played by national government in relocation and rehabilitation of project-affected communities.
- No project was found to have both a resettlement framework and a resettlement plan.

**Table A - 8.1. Resettlement plan definitions and guidance in GCF IPs Policy, GCF environmental and social safeguards and GCF ESP**

GCF IPs POLICY	GCF ENVIRONMENTAL AND SOCIAL SAFEGUARDS PERFORMANCE STANDARD #5	GCF ESP
Involuntary resettlement means <b>physical displacement</b> (relocation, loss of residential land or loss of shelter), <b>economic displacement</b> (loss of land, assets or access to assets, including those that lead to loss of income sources or other means of livelihood), or <b>both</b> , caused by project-related land acquisition or <b>restrictions on land-use</b> .	Involuntary resettlement refers both to <b>physical displacement</b> (relocation or loss of shelter) and to <b>economic displacement</b> (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) as a result of project-related land acquisition and/or <b>restrictions on land-use</b> . Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land-use that result in physical or economic displacement. This occurs in cases of: (i) lawful expropriation or temporary or permanent restrictions on land-use; and (ii) negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land-use if negotiations with the seller fail.	Involuntary resettlement means <b>physical displacement</b> (relocation, loss of residential land or loss of shelter), <b>economic displacement</b> (loss of land, assets or access to assets, including those that lead to loss of income sources or other means of livelihood), or both, caused by project-related land acquisition or restrictions on land-use. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land-use that result in displacement.

GCF IPs POLICY	GCF ENVIRONMENTAL AND SOCIAL SAFEGUARDS PERFORMANCE STANDARD #5	GCF ESP
<p>In <b>exceptional circumstances</b> where resettlement or displacement is unavoidable to achieve the project or programme objective, they will only be permitted if they meet the following criteria: (a) <b>FPIC</b> has been obtained as described above; (b) they are <b>authorized by national law</b>; (c) they are carried out in a <b>manner consistent with the obligations of the state</b> directly applicable to the activities under relevant international treaties and agreements; (d) they are <b>reasonable and proportional</b> as determined by GCF and the AE as part of their due diligence; (e) they follow standards of due process consistent with the <b>GCF ESS standards</b> and pursuant to <b>other applicable policies of GCF</b> and the AE, including those related to involuntary resettlement policy requirements; and (f) they are regulated so as to ensure <b>full and fair compensation and rehabilitation as well as right of return</b>, if applicable.</p>	<p>However, where involuntary resettlement is unavoidable, it should be minimized and <b>appropriate measures to mitigate adverse impacts</b> on displaced persons and host communities should be carefully planned and implemented. The government often plays a central role in the land acquisition and resettlement process, including the determination of compensation, and is therefore an important third party in many situations.</p> <p>Experience demonstrates that the direct involvement of the client in resettlement activities can result in more cost-effective, efficient and timely implementation of those activities, as well as in the introduction of innovative approaches to improving the livelihoods of those affected by resettlement.</p>	<p>GCF-financed activities will be designed and implemented in a way that avoids or minimizes the need for involuntary resettlement.</p>

GCF IPs POLICY	GCF ENVIRONMENTAL AND SOCIAL SAFEGUARDS PERFORMANCE STANDARD #5	GCF ESP
<p><b>No mention</b> of a resettlement plan or resettlement framework.</p>	<p>Where the exact nature or magnitude of the land acquisition or restrictions on land-use related to a project with potential to cause physical and/or economic displacement is unknown due to the stage of project development, the client will develop a <b>resettlement and/or livelihood restoration framework</b> outlining general principles compatible with this Performance Standard. Once the individual project components are defined and the necessary information becomes available, such a framework will be expanded into a specific <b>resettlement action plan or livelihood restoration plan</b> and procedures, in accordance with paragraphs 19 and 25 of the Performance Standard.</p>	<p>When limited involuntary resettlement cannot be avoided, GCF will require through informed consultations and participation of the people or communities affected by the activities, the preparation of a <b>resettlement action plan</b> or, if specific activities or locations have not yet been determined, a <b>resettlement policy framework</b> proportional to the extent of physical and economic displacement and the vulnerability of the people and communities.</p> <p>A <b>resettlement policy framework</b> will include provisions for the development and implementation of site-specific resettlement action plans that comply with the requirements of the AEs for such plans, pursuant to GCF standards and the ESP policy.</p> <p>In cases of economic displacement or restrictions of access to livelihoods as a result of land acquisition and resettlement, GCF will require the development of <b>livelihood restoration and compensation plans or frameworks</b>. These plans or frameworks will complement the social assessments of the activities and provide guidance on specific issues and due process related to involuntary resettlement, including land acquisition; consultations with the affected people on their rights and options; compensation for assets; FPIC in cases of Indigenous lands and territories; livelihood loss and restoration; transition allowances; facilities and resettlement sites; and grievance redress.</p>

Source: IIED evaluation team.



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