What can Indigenous Peoples, local communities and women expect from Global Climate and Forests Funds in terms of their rights? An introduction and comparison of Safeguards and Participation Mechanisms

Photo by John Isaac. A Maya family in the hamlet of Patzutzun, Guatemala, 1993. Source: UNEP-WCMC Internal Resources

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Summary

As a result of the regime on 'Reducing Emissions from Deforestation and forest Degradation and enhancing forest carbon stocks' (REDD+) adopted by the UN Framework Convention on Climate Change, several relatively new global funds or financial windows have been established to finance forest-related initiatives from a climate perspective.

The purpose of this briefing paper is to make a comparative analysis of the strengths and weaknesses of these funds´ rules and safeguards, specifically with respect to the rights of Indigenous Peoples, women and local communities, including their participation rights. Although we explore and compare a number of global funds, we place more emphasis on the Green Climate Fund, since it has recently emerged as the main multilateral finance mechanism within the international climate arena, with separate windows for adaptation and mitigation.

We hope this comparative analysis of current and potential funds will provide representatives of Indigenous Peoples, local communities, women and their support groups with information on the different safeguards and participation mechanisms in forest and climate change related funds.

We also hope it will enable both these groups and policy-makers to prioritise financial and political support to those global funds that have the most robust rights-related safeguards and participation procedures, especially given the often-voiced concern that REDD+ and other forest and climate related funding might actually violate the rights of Indigenous Peoples and local communities. While safeguards and participation mechanisms will not necessarily be able to address all the problems inherent in the REDD+ regime, it is important to know which global funds provide a stronger framework for defending Indigenous and community rights in forest and climate change policy.

Our main conclusion is that although numerous global climate and forests funds have been in the international arena for many years, overall they still fail to address the rights and needs of Indigenous Peoples, local communities and women. Even when they include specific text on safeguards and participation mechanisms relating to these groups, the language used is rather weak, and often ambiguous, meaning that it is open to interpretation. However, we can conclude that of all the funds analysed, the Global Environment Facility's Small Grants Programme seems to be the best—relatively speaking—in terms of respecting the rights and needs of Indigenous Peoples, local communities and women.

However, when it comes to the actual implementation of safeguards and the engagement of Indigenous Peoples, local communities and women in decision-making processes and the development of projects and activities, all the analysed funds—including the Small Grants Programme—lack strong enforcement mechanisms for safeguards.

Moreover, the meaningful and effective participation of Indigenous Peoples, local communities, women and other vulnerable groups in climate finance decision-making processes remains very

limited. The relevance of the participation mechanisms for these groups is evident, since in most of cases they will be the ones affected by the activities financed by the funds.

In addition there are significant concerns about the World Bank's comprehensive involvement in administering and providing advice to all the analysed funds, including as Interim Trustee for the GCF, especially given its own weak safeguards and its track record in funding fossil fuel projects.

The involvement of the private sector in climate finance has also been rightfully criticized, because of the risk of leveraging climate finance for middle-income countries and mitigation projects where there may be more chance of profitable investments being secured.

In short, policy makers, projects developers and other actors still have plenty of work ahead to guarantee that projects financed by the funds analysed below are in fact benefiting and genuinely taking into account the rights and needs of Indigenous Peoples, local communities, women and other often marginalised groups, whose livelihoods are frequently affected by externally funded projects and activities.

It is hoped that the GCF will provide a positive surprise. For instance, in its policy documents it has acknowledged from the beginning the relevance of mainstreaming gender aspects in all of its activities and projects. Yet the safeguards adopted by the GCF are still provisional and we will have to wait three years to know the final decision adopted on this issue.

Introduction

Global funds are a common and relevant element of the international arena in many different areas (climate change mitigation, AIDS, women and education). The most common institutional model is an autonomous legal entity entitled to manage the fund with a separate trustee that receives the income.

With respect to the international climate funding situation (including for the conservation and protection of forests), it is relevant to mention that by 2012, 76% of climate finance (US$273 billion) was spent domestically, and only 24% (US$86 billion) flowed between countries. From the total US$359 billion, US$224 billion was provided by private entities, while the other US$135 billion came from public sources.[1] From this, 94% was allocated to mitigation activities (such as solar, wind and biofuels); and only 6% was allocated to adaptation activities (such as adaptation of agriculture, livestock farming, fishing, forestry, land use management, natural resource management and disaster risk management).[2]

The reason for paying special attention to the GCF in particular, and analysing it in more depth, include its ambitious goals (See section 1); its potential relevance that this fund should have for

[1] http://www.climatefinancelandscape.org/?gclid=CNjygsionL8CFaPItAodLycAfA#where-is-climate-finance-
[2] http://climatepolicyinitiative.org/wp-content/uploads/2013/10/The-Global-Landscape-of-Climate-Finance-2013.pdf

combating climate change in general; its likely impact on forests and forest-dependent people; and the way in which it is being tied in to REDD+ negotiations. (During REDD+ negotiations it has been suggested that the GCF could become the main funding source for REDD+ activities as well as for joint mitigation and adaptation activities, with documentation elaborated in accordance with the methodological guidance in the Warsaw Framework for REDD+.[3])

It is thus important to compare it with alternative global forest and climate change funds, including the Forest Carbon Partnership Facility (FCPF), the Forest Investment Program (FIP), UN-REDD and others. We hope that this comparative analysis will help others to judge if this ambitious fund, the GCF, might really be able to help combat climate change and protect forests while enhancing and respecting Indigenous Peoples, local communities and women´s rights—or whether it will follow a 'business as usual approach'.

It is worth mentioning that as with other climate related international funds, the inception of the GCF has been surrounded by controversy regarding, among other things, the meaningful participation of those stakeholders that will receive the money; transparency issues related to means and disclosure of information; the ability of the GCF to actually raise the necessary amount of money to achieve its objectives; and what criteria or guidelines will be used to effectively allocate the money. Most of these issues are closely linked to the issue of safeguards, meaning that it is particularly important to compare and analyse different mechanisms with respect to those groups that are vulnerable and often marginalised, including Indigenous Peoples, local communities and women.

With respect to recent developments in terms of global funds, it is also relevant to mention here that at the 10th session of the UN Forum on Forests (UNFF) (in April 2013), delegates negotiated the possibility of creating a new Global Forest Fund. During the first meeting of the Open-ended Intergovernmental Ad Hoc Expert Group on the International Arrangement on Forests (which took place on February 2014 in Nairobi, Kenya), experts and panelists further discussed the establishment of a voluntary global forest fund. While some of them supported the idea (experts from Bolivia and Ghana for example), others stated that it would be better to focus on strengthening already existing mechanisms (Mexico, for instance). In a draft document elaborated in this meeting it was stated that there is a need to, "*consider the establishment of a Global Forest Fund, linked to the SFM needs of developing countries, under the aegis of UNFF*" and to "*make renewed efforts to address all sources of finance (including ODA, multilateral, bilateral, REDD+, private sector, national forest funds, Global Forest Fund and the better use of existing funds)*….." [4] However, this is still just an idea, to be taken forward at the UNFF's 11th session, which will take place in May 2015.

It is also important to mention that the Global Environmental Facility (GEF) has a funding window specially focused on providing funds for Sustainable Forest Management (SFM) projects, and in

[3] http://www.gcfund.org/fileadmin/00_customer/documents/MOB2014108th/GCF_B.08_08_Initial_Logic_Model_fin_20141005.pdf

[4] http://www.un.org/esa/forests/pdf/aheg/IAF/Supplementary_info_AHEG1_Nairobi_report.pdf

2012 the first two SFM/REDD+ projects were approved under the GEF Incentive Mechanism for Forests (See section 2).

1. The Green Climate Fund

The Green Climate Fund (GCF) is the newest actor in the multilateral climate finance architecture and it consists of an international financial mechanism which aims to become the main multilateral financing mechanism for transferring money from developed countries to developing countries to combat climate change. During the UNFCCC's COP 15, the 'Copenhagen Green Climate Fund' was mentioned in the Copenhagen Accord, but this Accord was not adopted by the UNFCCC Parties. It was actually formally approved at COP 16 in Cancun, and during COP 17 the governing instrument of the GCF was adopted by Decision 3 as a component of the 'Durban Package'.[5] The GCF is to be established as a fund within the framework of the UNFCCC and is accountable and works under the guidance of the COP.

1.1. Structure and organisation

The GCF is currently articulated through three main entities: the Board, the Trustee and the Secretariat. The GCF is supervised and governed by the Board, which is responsible for the funding decisions and can be guided by the COP. The Board consists of 24 members, 12 from developed countries and 12 from developing countries. The members can be (re)elected every three years and there are two Co-Chairs who are elected by the Board for a one year period. The creation of subcommittees and panels (as required) and the development of a mechanism to allow the participation of stakeholders and incorporate their inputs are also part of the Board´s responsibilities.

The World Bank is involved as Interim Trustee, having administrative competence over the GCF's financial assets. This fact has generated concern among social movements, NGOs and developing country parties.[6] Furthermore, although the Bank's role as interim trustee is due to be reviewed three years after the Fund becomes operational, it could still be re-elected as Trustee.

The GCF's Secretariat aims to provide logistical, administrative and technical support to the Board, and is located in Songdo, South Korea.[2]

As stated by the Green Climate Fund itself, *"the purpose of the GCF is to make a significant and ambitious contribution to the global efforts towards attaining the goals set by the international community to combat climate change."* [7] For this purpose, the GCF is expected to raise US$100 billion by 2020, to assist adaptation and mitigation activities in developing countries using thematic windows, initially for mitigation and adaptation. The money for the Fund can come from both public and private sources.

[5] Schalatek, Liane & Nakhooda, Smita. (2013). The Green Climate Fund. Climate Finance Fundamentals 11. Heinrich Böl Stiftung & ODI.
[6] http://www.forestpeoples.org/nl/node/3648
[7] http://www.gcfund.org/home.html

Although the GCF is a relatively young mechanism, a remarkable amount of progress has so far been made in terms of operationalising it and making the mobilisation of funds for adaptation and mitigation activities a reality. The money will be equally allocated for adaptation, mitigation, and the Private Sector Facility (PSF). 50% of the money allocated for adaptation will go to Small Island Developing states (SIDs), Least Developed Countries (LDCs), and African States. The PSF is directed to focus on local private actors, including Small and Medium Enterprises[8] in developing countries. The GCF also recognises the importance of achieving geographic balance regarding the allocation of resources.

However, there are many issues that still need to be further shaped, and concerns have been raised regarding the attainment of its goals by 2020. As of March 2014, the GCF had raised US$36.7 million to be used by developing countries for readiness activities. Yet, due to the Secretariat and Trustee maintenance costs, the mentioned amount was reduced to approximately US$28 million.[9] As for now, and taking into account earlier pledges, the GCF has raised $2.3 billion in total.[10] So far most of the pledges have been from developed countries (although developing countries such as Peru and Colombia have expressed their intention to contribute to the GCF), and the most significant contributions have been made by France and Germany which have recently pledged US$1 billion each. Other significant contributions are those of South Korea (with US$100 million pledged), Switzerland (US$100 million), Denmark (US$70 million) and Norway (US$33 million).[11]

Christiana Figueres (UNFCCC Executive Secretary) noted that the initial capitalisation should be *"at least USD$10 billion"* while others such as the Climate Action Network consider that USD$10-15 billion is required over three years (Fenton, 2014). Recently, governments agreed that the GCF needs to raise US$10-15 billion by December (when the next COP will take place in Lima, Peru) to become *"credible"*.[12] The problem of the GCF's inability to raise enough money is probably exacerbated by the fact that the amount of money being pledged by developed countries to climate funds has been going down. For instance, in 2013 pledges were 71% lower than those made in 2012 (Fenton, 2014). Talk of these large sums of money has also led to the belief that a considerable amount of the money needed by the GCF to meet its objectives will have to come from the private sector.

However, new pledges made in September, including the pledges of US$1 billion each from Germany and France (plus additional 'promises of pledges' from some countries such as the US) has raised some optimism, including among Civil Society Organisations. Nevertheless scepticism and doubts remain.[13] For instance, in spite of these new commitments, this still leaves the fund

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[8] Schalatek, Liane & Nakhooda, Smita. (2013). The Green Climate Fund. Climate Finance Fundamentals 11. Heinrich Böl Stiftung & ODI

[9] http://fiftrustee.worldbank.org/webroot/data/GCF_MR_03_14.pdf

[10] http://www.rtcc.org/2014/09/24/green-climate-fund-receives-1-3-billion-in-new-pledges/

[11] http://www.rtcc.org/2014/09/24/green-climate-fund-receives-1-3-billion-in-new-pledges/

[12] http://www.rtcc.org/2014/09/24/green-climate-fund-receives-1-3-billion-in-new-pledges/

[13] http://www.rtcc.org/2014/09/12/finance-finally-on-horizon-for-uns-green-climate-fund/

with less than a sixth of the total amount that developed countries should provide.[14] In addition, although countries made promises to meet the US$100 billion climate finance target by 2020, it was not clear whether they will actually contribute those funds to the GCF.[15] The time frame for these pledges is a bit concerning as well. For instance, Germany stated that, "*its pledge was for 4 years, while "concrete encashment" will be in accordance with "normal programme development within 9 years."*[16] With respect to France, Oxfam also noted that President Hollande did not specify whether France's pledge is actually going to be in addition to existing commitments related to climate and development.[17]

1.2. Safeguards and Participation

The GCF has not developed and adopted its own specific safeguards for the accreditation of implementing entities yet. During the Board´s May 2014 meeting it was decided that the Fund will develop its own set of environmental and social safeguards with multi-stakeholder participation within three years of the Fund becoming operational.[18] Therefore, for now and after analysing some of the already existing environmental and social safeguards the Board decided *"that the IFC performance standards are the most comprehensive best practice safeguards,"* adopting them as a "lower standard" (IFC stands for the International Finance Corporation, which is a member of the World Bank Group focusing on the private sector in developing countries). However, the Board recognises that "*it is recommended, at least during an initial phase, not to adopt the IFC performance standards in total, but to establish the safeguards for the Fund in a style similar to the Adaptation Fund's environmental and social principles, which include relevant risk issues from the IFC performance standards."* [19] So in summary this means that the GCF will *"follow the same approach as the Adaptation Fund and elaborate the Fund's own environmental and social safeguards drawing on the Adaptation Fund's environmental and social policy and based on the performance standards of the International Finance Corporation."* [20]

For now, the Green Climate Fund´s initial environmental and social safeguards include the following issues: compliance with the law; assessment and management of environmental and social risks and impacts; disadvantaged and vulnerable groups; human rights (stating that projects/programmes will respect internationally accepted human rights); labour and working conditions; protection of natural habitats; conservation of biological diversity; climate change;

[14] http://www.oxfam.org/en/pressroom/reactions/un-climate-summit-leaders-must-leave-new-york-voice-citizens-ringing-their-ears
[15] http://www.rtcc.org/2014/09/12/finance-finally-on-horizon-for-uns-green-climate-fund/
[16] http://www.rtcc.org/2014/09/12/finance-finally-on-horizon-for-uns-green-climate-fund/
[17] http://latest.com/2014/09/plenty-suspicion-todays-un-climate-summit-just-another-talk-fest/
[18] http://www.twnside.org.sg/title2/climate/info.service/2014/cc140506.htm
[19] http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B06_09_Guiding_Framework_for_Accreditation_fin_20140211.pdf
[20] http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B06_09_Guiding_Framework_for_Accreditation_fin_20140211.pdf

pollution prevention and resource efficiency; public health and safety and security; physical and cultural heritage; and land and soil conservation. [21]

There are three more safeguards that specifically focus on gender equity and women's empowerment*: "Projects/programmes will be designed and implemented in such a way that both women and men: a) Are able to participate fully and equitably; b) Receive comparable social and economic benefits ; and c) Do not suffer disproportionate adverse effects during the development processes."* [22]

a) Indigenous peoples

"Projects/programmes will be consistent with the rights and responsibilities set forth in the United Nations Declaration on the Rights of Indigenous Peoples and other applicable international instruments relating to indigenous peoples." [23]

And also important for vulnerable groups about Involuntary Resettlement,

"Projects/programmes will be designed and implemented in a way that avoids the need for involuntary resettlement (physical and economic displacement). When the limited involuntary resettlement is unavoidable, it should be minimized and ideally resolved through negotiated settlement and expropriation should be avoided. Due process should be observed so that displaced persons are informed of their rights, consulted on their options, and offered technically, economically and socially feasible resettlement alternatives or fair and adequate compensation (at replacement cost). If livelihoods are adversely impacted, they should be restored." [24]

Although it might be a temporary solution, the adoption by the GCF of the IFC standards has been criticised by CSOs claiming that they are too weak for this type of Fund.[25] In March 2014, various organisations wrote a joint submission to the GCF Accreditation and Safeguards Committee addressing the need for further improvement and strengthening of the safeguards and fiduciary standards initially adopted by the GCF. For instance, they mentioned the need to adopt, among other things, a 'do no harm' approach, the highest international standards possible (stating that the IFC standards do not represent international best practice), and standards on transparency, accountability and comprehensive and gender-responsive stakeholder engagement. They also

[21] http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B06_09_Guiding_Framework_for_Accreditation_fin_20140211.pdf
[22] http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B06_09_Guiding_Framework_for_Accreditation_fin_20140211.pdf
[23] http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B06_09_Guiding_Framework_for_Accreditation_fin_20140211.pdf
[24] http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B06_09_Guiding_Framework_for_Accreditation_fin_20140211.pdf
[25] http://www.forestsclimatechange.org/forests-climate-change-finance/forests-land-use-green-climate-fund/

emphasised the need to specify that the projects/programmes that have an impact on Indigenous Peoples will only proceed with their free, prior and informed consent, which must be obtained, documented and sustained.[26]

However, during the meeting in May 2014, the document on decisions of the Board still stated that the GCF *"will adopt, on an interim basis, the environmental and social Performance Standards (PS) of the International Finance Corporation*" and "*these will be used by the Fund in combination with the IFC's Guidance Notes, which provide more detail on each PS, until the Fund's own environmental and social safeguards (ESS) are fully developed".* Regarding the Fund´s environmental and social safeguards, the document also contains the decision *"to aim to complete the process of developing the Fund's own environmental and social safeguards (ESS), which will build on evolving best practices, within a period of three years after the Fund becomes operational, and with inclusive multi-stakeholder participation."* [27]

Moreover, the participation of stakeholders in the decision-making processes and functioning of the Fund has also been contested since the inception of the GCF. Three main concerns regarding participation and inputs have been identified: a) Observers' participation; b) The type of information that can be disclosed; and c) The means of disclosure.

b) Observer participation

The Fund recognises three types of observer organisations: civil society organisations (CSOs); private sector organisations (PSOs); and International entities.[28] The observers are divided into two categories namely, 'active' and 'other' observers. Regarding active observers, the provisions of the Fund establish that the Board would invite two representatives of civil society organisations to participate, as well as two representatives from the private sector (for both categories one representative from a developed country and another one from a developing country). The selection of representatives is made on an ad-hoc self-selection basis and their duty can last two years with a maximum of two consecutive terms. The 'other' observers´ category includes Parties and Observer States to the UNFCCC; implementing entities of the Fund; United Nations and other intergovernmental organisations; non-governmental organisations and private sector organisations (PSOs).[29] However, these other observers are allocated in an overflow room unless the Board expresses the wish to invite a few of them to sit at the back of the meeting room.

It is important to note that there are no dedicated participation slots for Indigenous Peoples Organisations, local communities or women. Although the provisions of the Fund states that "*the*

[26] http://www.ciel.org/Publications/Safeguards_CSOs_17Mar2014.pdf
[27] http://gcfund.net/fileadmin/00_customer/documents/MOB201406-7th/GCF_B07_Decisions_Seventh_Meeting_fin_20140619.pdf
[28] http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B05_Inf02_Activities_Interim_Secretariat_fin_20130917.pdf
[29] GCF/B.01-12/03 3 August 2012, http://gcfund.net/fileadmin/00_customer/documents/pdf/B1.01-12.03_Observers_participation_FINAL.pdf

Board will develop mechanisms to promote the input and participation of stakeholders, including private-sector actors, civil society organizations, vulnerable groups, women and indigenous peoples, in the design, development and implementation of the strategies and activities to be financed by the fund" there is a widely spread concern that the Fund is failing to achieve this and many criticisms have been levelled regarding the participation of stakeholders.

The fact that there are only two representatives of CSOs that can actively participate in the Board meeting has been addressed as insufficient by many, due to the large number and diversity of CSOs (and it is important to note most Indigenous Peoples do not identify as 'civil society' in the first place). They thus bring their own views, in addition to the already broad and diverse expertise of CSOs.

Furthermore, even though CSOs' opportunity to participate is minimal, since they only have two representatives, even this might not be very meaningful since they may not be allowed to talk or approach Board members.[30] In fact, active observers can only intervene after the invitation of the co-chairs and they are not allowed to ask for expert input for the Board´s discussions or propose items for the agenda.[31] Likewise, active observers are not allowed to participate in Board committees or panels unless there are some sort of special circumstances and it has been previously authorised by the Board.[32]

The need to have additional observers in the Board´s meeting room to support the active observers when needed has also been raised.[33] This is particularly important given the multiple constituencies that the active observers have to represent.

Another recent issue that is of great concern is the fact that the GCF decided to appoint CSO representatives to the Private Sector Advisory Group but instead of the people chosen by the coalition of CSOs observing the Fund, they were picked by the Secretariat,[34] once again undermining genuine participation. Another difficulty is that the Board is not currently providing finance to support the participation of observers from the South.

c) Information Disclosure

In regard to information disclosure the GCF will most likely adopt a policy based on a negative list approach. This basically means that all information would be disclosed with the exception of certain types of information that are specified in a list. In the proposed draft, categories included in the so-called negative list so far are in line with those normally restricted by most international

[30] http://www.aida-americas.org/en/blog/can-cop19-move-green-climate-fund-closer-reality
[31] Schalatek, Liane & Nakhooda, Smita. (2013). The Green Climate Fund. Climate Finance Fundamentals 11. Heinrich Böl Stiftung & ODI
[32] http://www.aida-americas.org/sites/default/files/GCFCSOparticipation%20letter_0.pdf
[33] http://www.aida-americas.org/sites/default/files/GCFCSOparticipation%20letter_0.pdf
[34] http://www.ips-dc.org/7_things_to_look_out_for_in_the_uns_green_climate_fund/

organisations.[35] The Secretariat is now in charge of developing a comprehensive draft to be considered by the Board in late 2014. However, the creation of a permanent information disclosure policy is on the work plan for June 2015. For now the GCF will continue operating under the 'Interim Information Disclosure Practice,' [36] which has already been explained above.

d) Means of disclosure

According to the provisions of the Fund there are three main ways of accessing information. Firstly the Fund´s website, which is described as the main vehicle for information disclosure. In addition to that, requests for information can be fulfilled or denied in accordance with the aforementioned negative list. Other means include the dissemination of relevant information for stakeholders through the use of 'appropriate channels'.[37] However, there is no mention about what the Fund would consider 'appropriate'. The provisions of the Fund also state that the timing of disclosure will vary depending on the nature of the information. For instance, annual reports will be published on the website once they are approved by the Board, while recorded videos of Board meetings can be found within three weeks of the date of the meeting.

These channels of information disclosure are insufficient and the logic behind their choice rather dubious. For instance, dissemination of information about the Board´s meetings has been a much contested topic since the inception of the Fund. Three options have been discussed: no webcasting at all; on-demand webcasting by registering on the Fund´s website and making the videos available three weeks after a meeting; and live webcasting. Since the Fund has claimed that it aims to be transparent and allow participation of stakeholders in an effective and efficient manner, the latter option would seem to be the best choice, possibly in combination with the second for those interested stakeholders that could not follow the live broadcasting. However, live broadcasting was rejected by the Fund on the basis that it is too costly. It also argued that live webcasting can have impacts on the nature of the negotiations. The Fund did approve some live webcasting but only in an overflow room, which means that only people with enough resources to fly to the meetings´ location will be able to follow live negotiations. In other words, those with insufficient resources that want to know exactly what happened during the negotiations will have to wait patiently for three weeks and then look for the videos online.

Box 2. Green Climate Fund key facts

- Interim Trustee: World Bank
- Money raised: $2.3 billion
- Safeguards: does not have its own safeguards yet. Adoption of IFC standards as a "lower standard". It will elaborate its own safeguards within 3 years drawing on the Adaptation Fund safeguards and based on performance standards of the IFC
- Participation: 2 CSOs representatives are allowed as observers in Board meetings

[35] For more information about these categories see http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B05_16_Disclosure_Practices_Fin_20130917.pdf
[36] http://www.freedominfo.org/2014/10/disclosure-policy-agenda-climate-fund/
[37] http://gcfund.net/fileadmin/00_customer/documents/pdf/GCF_B05_16_Disclosure_Practices_Fin_20130917.pdf

2. The Global Environment Facility and its Small Grants Programme

The Global Environmental Facility (GEF) was launched in 1991 as a pilot programme of the World Bank, with a view to offering economic support regarding the protection of the global environment and the promotion of environmental sustainable development. It brings different intergovernmental organisations together as 'GEF agencies' to implement GEF projects.[38]

Three years after it was established the GEF was restructured and became the financial mechanism for both the UN Convention on Biological Diversity and the UN Framework Convention on Climate Change (as well as other environmental conventions such as the Stockholm Convention on Persistent Organic Pollutants (POPs), the UN Convention to Combat Desertification (UNCCD) and the Minamata Convention on Mercury).[39]

The GEF has seven main areas of work: biodiversity, climate change (mitigation and adaptation), chemicals, international waters, land degradation, ozone layer depletion and sustainable forest management/REDD+(SFM/REDD+). However, is important to mention that the first two SFM/REDD+ projects under the GEF Incentive Mechanism for Forests were only approved in 2012.[40] Previously, projects focused on the protection and conservation of forests were to be found under other areas of work such as biodiversity and climate change. Over the last two decades the GEF spent approximately US$1.5 billion on forest-related projects[41] out of the US$12.5 billion in grants that it has raised since 1991 and leveraged US$58 billion in co-financing.[42] Co-financing is defined by the GEF as "*resources that are additional to the GEF grant and that are provided by the GEF Partner Agency itself and/or by other non-GEF sources that support the implementation of the GEF-financed project and the achievement of its objectives.*"[43]

The GEF's Small Grants Programme (SGP) was launched at the Rio Earth Summit in 1992 and founded by the Global Environmental Facility (GEF) and the United Nations Development Programme (UNDP). The aim of the SGP is to provide financial and technical support to projects that focus on the conservation and restoration of the environment while enhancing peoples´ livelihoods and well-being. The SPG has a broader remit than the GCF, focusing on climate change adaptation and mitigation projects but also on biodiversity, land degradation, international waters, chemicals and sustainable forest management.

2.1. Structure and Organisation

The GEF is mainly articulated through:

- The GEF Assembly, in which representatives from all member countries participate.

[38] http://www.thegef.org/gef/gef_structure
[39] http://www.thegef.org/gef/whatisgef
[40] http://climate-l.iisd.org/news/gef-approves-first-two-projects-under-the-sfmredd-window/
[41] http://www.thegef.org/gef/sites/thegef.org/files/publication/forestry.pdf
[42] http://www.thegef.org/gef/whatisgef
[43] http://www.thegef.org/gef/policy/co-financing

- The GEF Council, which is its primary decision-making body, with representatives from 16 developing countries, 14 developed countries, and two economies in transition.
- The GEF Secretariat.
- Ten GEF Agencies, which are mostly intergovernmental organisations such as the United Nations Development Programme (UNDP), the United Nations Environment Programme (UNEP), World Bank, the Food and Agriculture Organization (FAO), the International Fund for Agricultural Development (IFAD), the United Nations Industrial Development Organization (UNIDO) and various regional banks. It also includes the International Union for Conservation of Nature (IUCN) and two non-governmental conservation organisations, Conservation International and WWF-International.[44]
- A Scientific and Technical Advisory Panel (STAP).
- An Independent Office of Monitoring and Evaluation.
- The GEF Trustee, the World Bank.

Moreover, there are currently 183 country participants and in each country there is a GEF Political Focal Point (its main function is related to GEF governance). In addition to the GEF Political Focal Point, in recipient countries there is also a GEF Operational Focal Point (its main function is related to operational aspects). In 1995 the GEF also established the 'GEF NGO network' as the main mechanism for the involvement of civil society organisations (CSOs).[45]

The organisational structure of the GEF's SGP is quite decentralised, country-driven and straightforward. As mentioned it was founded by the GEF and UNDP and is implemented by the United Nations Office for Project Services (UNOPS). At the global level it is mainly articulated through its Central Programme Management Team and the UNDP Communities Cluster, and is further operationalised at the country and local levels through National Country Teams (a locally recruited National Coordinator and often a Programme Assistant), Country Programme Strategies and the National Steering Committee (this Committee embraces the majority of CSOs, Indigenous Peoples Organisations, academia, media, government representatives, UNDP and private sector representatives).[46]

One of the main eligibility criteria is that grants have to be provided mainly to Civil Society Organisations (CSOs), national and local NGOs, Community-Based Organisations (CBOs) and Indigenous Peoples Organisations (IPOs). However other not-for profit organisations like professional associations, unions and other civil society groups can also be the beneficiaries of GEF grants. The other main eligibility criterion is that the organisation making the request has to be located in a country that is part of the list of countries where the GEF SGP works.[47] The application for a grant has to be made through the SPG National Coordinator who will assist the organisation with the preparation of the project proposal and further improvements of the proposal when needed. The amount of money for a given project varies but there is a maximum of US$50,000 and

[44] http://www.thegef.org/gef/gef_agencies
[45] http://www.thegef.org/gef/gef_structure
[46] https://sgp.undp.org/index.php?option=com_content&view=article&id=98&Itemid=156
[47] https://sgp.undp.org/index.php?option=com_countrypages&view=countrypages&Itemid=152

the average is usually around US$25,000. The GEF SGP also offers a maximum grant of US$5,000 to groups that do not have the capacity to develop a Full Grant Proposal.[48]

Since its inception in 1992, the SGP has been through a pilot phase that lasted until 1995, and four operational phases with their respective independent evaluations. The fifth operational phase started in 2011 and is expected to end in 2014. According to the GEF SGP during the first 20 years, *"SGP has provided grants to over 12,000 grantees with 64 percent of grants channeled to NGOs, 34 percent to CBOs, and 2 percent to other not-for-profit organizations. More than 60 percent of projects have directly benefitted communities either through direct grants to CBOs or through other NGOs and CSOs working with communities."* [49] The SGP receives contributions from different sources including governments, the private sector, academia and Civil Society Organisations, and those contributions can be cash or in-kind contributions. Since it was launched it has raised more than $US900 million. However, the GEF itself is the main donor and it has contributed nearly $US600 million.[50]

Currently, there are some 125 countries listed as eligible for GEF SGP funding and the relevant webpages provide information about, among other things, the number of projects, the total amount granted, project documents and results achieved so far for each country.[51,52] For the period from 1992 to 2012, Latin America and the Caribbean regions hosted the highest number of funded projects. Under the GEF SGP, the focal areas that received most funding were biodiversity and climate change mitigation, with total grants amounting to US$248 and US$113 respectively.[5354]

2.2. *Safeguards and Participation*

Regarding safeguards related to Indigenous Peoples, local communities and women´s rights, the GEF has the 'GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards' which was revised and re-launched in 2011 after incorporating commentaries and feedback from Council members, the GEF NGO network, GEF agencies and CSOs. This document includes *"a set of principles that should be applied to GEF projects"* and *"eight minimum standards that all the GEF Partner Agencies will be expected to meet in order to implement GEF projects".*

The safeguards related to indigenous Peoples, local communities and women are those established in this document. The eight minimum standards derive from the World Bank's safeguards polices and address the following: environmental and impact assessment, natural habitats, involuntary resettlement, indigenous peoples, pest management, physical cultural resources, safety of dams and accountability and grievance systems.

[48] https://sgp.undp.org/index.php?option=com_content&view=article&id=274&Itemid=209#.U_OYHPl_tnE
[49] https://sgp.undp.org/index.php?option=com_content&view=article&id=98&Itemid=156#.UOeTvl_tnE.
[50] http://www.thegef.org/gef/sgp
[51] https://sgp.undp.org/index.php?option=com_content&view=article&id=98&Itemid=156#.VDZ6uvl_tnF
[52] https://sgp.undp.org/index.php?option=com_sgpprojects&view=projects&Itemid=154
[53] https://sgp.undp.org/index.php?option=com_areaofwork&view=summary&Itemid=170
[54] https://sgp.undp.org/index.php?option=com_areaofwork&view=summary&Itemid=176

More specifically the criterion for the minimum standard related to Indigenous Peoples states that "*established policies, procedures, and guidelines require the Agency to ensure projects are designed and implemented in such as way that fosters full respect for Indigenous Peoples' and their members' dignity, human rights, and cultural uniqueness so that they a) receive culturally appropriate social and economic benefits; and b) do not suffer adverse effects during the development process*" [55] (the minimum requirements for this criterion can be found in Annex I).

The GEF also elaborated a specific document focusing on the participation of Indigenous Peoples, entitled, 'Principles and Guidelines for Engagement with Indigenous Peoples in GEF Projects and Processes.' These provide seven additional guidelines, such as *"the GEF acknowledges that Indigenous Peoples play an important role in coordinating efforts with the GEF in fulfilling its mandate to protect the global environment"* and "*recognizes that Indigenous Peoples are valuable stakeholders, partners and rights-holders with an important role in the sustainable use, management and conservation of the global environment.*" [56,57]

In addition, in 2012 the GEF also developed a 'Policy on Gender Mainstreaming.' The GEF states that GEF Partner Agencies are required to establish *"policy or policies (this may include relevant laws, regulations, and guidelines), a strategy, or an action plan that requires the Agency to design and implement projects in such a way that both women and men (a) receive culturally compatible social and economic benefits; (b) do not suffer adverse effects during the development process; and that (c) fosters full respect for their dignity and human rights"* [58] when implementing GEF projects. It describes seven minimum requirements.[59]

The SGP is generally seen as one of the few successes regarding climate finance. It includes projects that focus on the conservation and protection of forests, and it is usually considered as being progressive and flexible, especially when compared to other GEF programmes. However, some criticisms and concerns regarding some of its components have been raised as well. For example, its safeguard policies have been heavily criticised by IPOs because they draw on outdated World Bank policies. Local communities and Indigenous Peoples Organisations have also complained about the procedures being too complex and on many occasions too lengthy. According to a paper elaborated by the Forest Peoples Programme, *"it seems that in some cases there are indications that SGP have been used to support government agendas even if these pass*

[55] http://www.thegef.org/gef/sites/thegef.org/files/documents/C.41.10.Rev_1.Policy_on_Environmental_and_Social_Safeguards.Final%20of%20Nov%2018.pdf

[56] http://www.thegef.org/gef/sites/thegef.org/files/documents/C.42.Inf_.03.Rev_.1_Principles_and_Guideline_for_Engagement_with_Indigenous_Peoples.Sept%2010,%202012.pdf

[57] For more detailed information on the guidelines see http://www.thegef.org/gef/sites/thegef.org/files/documents/C.42.Inf_.03.Rev_.1_Principles_and_Guideline_for_Engagement_with_Indigenous_Peoples.Sept%2010,%202012.pdf).

[58] http://www.thegef.org/gef/sites/thegef.org/files/documents/document/PL.SD_.02.Policy_on_Gender_Mainstreaming.05012012.Final_.pdf

[59] For detailed information on the minimum requirements see http://www.thegef.org/gef/sites/thegef.org/files/documents/document/PL.SD_.02.Policy_on_Gender_Mainstreaming.05012012.Final_.pdf

through NGOs as project executing agencies and grant recipients." [60] In some countries, there have also been criticisms regarding weak links between the National Steering Committees´ representatives and local communities or Indigenous movements. The fact that GEF policies only contemplate the need for free, prior and informed consent in countries that have ratified ILO Convention 169 has also been criticised by many IPOs.[61]

Box 3. Global Environment Facility facts

- Interim Trustee: World Bank
- Money raised: US$12.5 billion (plus leveraged US$58 billion in co-financing)
- Safeguards: GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards (the 8 minimum standards derive from World Bank safeguards policies) + Principles and Guidelines for Engagement with Indigenous Peoples in GEF Projects and Processes and Policy on Gender Mainstreaming
- 'GEF NGO network' as the main mechanism for the involvement of civil society organisations

3. The Forest Investment Program

The Forest Investment Program (FIP) became operational in 2009 and is a program of the Strategic Climate Fund (SCF), which is one of two funds under the World Bank-administered Climate Investment Funds (CIF). The FIP mainly aims at the mobilisation of funds for activities focused on the reduction of deforestation and forest degradation, and the promotion of sustainable forest management practices. These activities should lead to the protection of carbon sinks (only terrestrial sinks are considered) and the reduction of emissions. In other words, the FIP funds are oriented at supporting countries attaining their goals with respect to REDD+ projects and activities. FIP works in collaboration with other funds focused on REDD, such as the Forest Carbon Partnership Facility (FCPF), the Global Environmental Facility (GEF), and the UN-REDD Programme.

3.1. *Structure and Organisation*

The FIP is articulated through a FIP Sub-Committee that makes decisions about its operations and activities. This consists of 12 representatives, six from donor countries (Australia, Denmark/Spain, Japan, Norway, UK and US)[62] and six from recipient countries (currently Brazil, Democratic Republic of Congo, Ghana, Indonesia, Mexico and Peru). The representatives of the recipient countries and MDB Committee/Trustee (MDB stands for Multilateral Development Banks which aim to support effective and flexible implementation of country-led programs and investments of the Climate Investment Fund) can attend the FIP Sub-Committee as observers. Other permitted observers include two civil society representatives and two alternates, two Indigenous Peoples representatives, two representatives from the private sector, and one representative each from

[60] http://www.forestpeoples.org/sites/fpp/files/publication/2010/08/gefstudyjan05eng.pdf
[61] http://www.forestpeoples.org/topics/global-environment-facility-gef/news/2012/04/indigenous-peoples-call-global-environment-facil
[62] Briefing Sessions on Climate Funding Opportunities Organised by the ACP Secretariat / Intra-ACP Global Climate Change Alliance (GCCA) Programme Under the 10th EDF Intra-ACP Financial Framework

the FCPF secretariat, the GEF, the UNFCCC and the UN-REDD technical secretariat.[63] There is also an expert group established by the FIP Sub-Committee in charge of making recommendations about the selection of regional projects or countries. The World Bank constitutes the Administrating Unit and the Trustee of the FIP.

At the moment the FIP is working in eight pilot countries: Brazil, Burkina Faso, Democratic Republic of Congo, Ghana, Indonesia, Lao People's Democratic Republic, Mexico and Peru. At the time of writing a total of US$639 million had been pledged to this fund.[64] The implementing organisations for the investments made by the FIP are the World Bank Group, the African Development Bank, the Asian Development Bank, the European Bank for Reconstruction and Development, and the Inter-American Development Bank.

The FIP has a Dedicated Grant Mechanism (DGM) for Indigenous Peoples and Local Communities which is in addition to the FIP Investment Plans for each country. The DGM is meant to *"provide grants to indigenous peoples and local communities in country or regional pilots to support their participation in the development of the FIP investment strategies, programmes and projects."* [65] So far the DGM has raised $50 million.[66]

3.2. Safeguards and Participation

Regarding safeguards, the FIP has guidelines or criteria related to the inclusion of relevant stakeholders (including Indigenous Peoples, local communities and women) during the development of investment strategies, programmes and projects, and with respect to the transparency and need for public consultation by, among other things, making available all the projects´ documents. However, since the FIP's funds are controlled by the different Multilateral Development Banks, when it comes to the local level, the safeguards implemented are those that each of these banks establishes.[67]

The FIP follows the principles established by the Governance Framework of the Strategic Climate Fund (SCF). In addition, in the FIP´s design document, some additional principles and criteria were also developed that are intended to complement those set by the SCF. The *"Inclusive processes and participation of all important stakeholders, including indigenous peoples and local communities*" is among these criteria. They also state that:

"Consistent with relevant international instruments, obligations and domestic laws, FIP investment strategies, programs and projects at the country or regional level should be designed and implemented under a process of public consultation, with full and effective participation of all

[63] https://www.edf.org/sites/default/files/FCPF,%20FIP,%20UNREDD%20summary%20Oct%202012.pdf
[64] https://www.climateinvestmentfunds.org/cif/sites/climateinvestmentfunds.org/files/CIF_1.pdf
[65] http://www.brettonwoodsproject.org/2014/06/forest-investment-program-fip-2/
[66] http://www.forestcarbonpartnership.org/sites/fcp/files/Documents/tagged/3c.Results%20of%20the%20Mapping%20Exercise%20March%2022.pdf
[67] http://www.forestpeoples.org/topics/climate-forests/world-bank/forest-investment-programme-fip

Box 4. REDD+ Safeguards
An important milestone in REDD+ was the adoption of a list of nine safeguards at UNFCCC COP 16 in Cancun, in 2010:

a) That actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements;
b) Transparent and effective national forest governance structures, taking into account national legislation and sovereignty;
c) Respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws, and noting that the United Nations General Assembly has adopted the United Nations Declaration on the Rights of Indigenous Peoples;
d) The full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities, in the actions referred to in paragraphs 70 and 72 of this decision;
e) That actions are consistent with the conservation of natural forests and biological diversity, ensuring that the actions referred to in paragraph 70 of this decision are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits;
f) Actions to address the risks of reversals;
g) Actions to reduce displacement of emissions.

However, these safeguards are quite broad and national governments have to interpret and decided how to implement them.

relevant stakeholders on matters that affect their distinctive rights, including in particular groups that historically have tended to be marginalized such as indigenous peoples, local communities and women….. FIP financed activities should, moreover, be consistent with, and/or complement, national sustainable development plans and be based upon broad community support and effective collaboration between indigenous peoples and local communities, government ministries, private sector and financial institutions in planning and implementing investment strategies." [68]

Civil society and private sector actors have expressed concern about different issues. For instance, the criteria used to select the pilot countries have been criticised as being almost purely technical and not taking into account the governance capacity of recipient countries.[69] The differences between the safeguards among the Multilateral Development Banks have also led to confusion and in some occasions to problems in regard to guaranteeing accountability and standardising the safeguards.

Moreover, during the period for inputs and feedback on the FIP´s design, recommendations and suggestions made by civil society and Indigenous Peoples observers about the guidelines, regarding compliance with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the inclusion of Free, Prior and Informed Consent (FPIC) were rejected. Currently the FIP guidelines have no specific criteria regarding UNDRIP or FPIC. This is especially worrisome since the FIP established in its Program Design document that *"FIP investment strategies, programs and projects at the country or regional level should be designed and implemented under a process of*

[68] https://www.climateinvestmentfunds.org/cif/sites/climateinvestmentfunds.org/files/FIP_Design_Document_July_final.pdf
[69] http://www.brettonwoodsproject.org/2010/07/art-566530/

public consultation, with full and effective participation of all relevant stakeholders on matters that affect their distinctive rights…."[70,71]

For instance, in Peru, which is the most recently incorporated FIP pilot country, AIDESEP (a Peruvian Indigenous Peoples Association) and CONAP (the Confederation of Amazonian Nationalities of Peru) criticised the investment plan for Peru due to the lack of consultation, and because it did not comply with safeguards concerning indigenous rights and territories, meaning that it neglected their concerns regarding the strong support provided to private sector interests especially in the palm oil, plantation and logging sectors.

Similarly, the Alliance of Yogyakarta Civil Society protested against the FIP Investment Plan for Indonesia, again due to a lack of transparency and inclusion. In a letter sent to the Sub-Committee they claimed that the FIP *"will strengthen expropriation and marginalization of rights of indigenous and local communities and women in the governance of forest resources."* [72]

Box 5. Forest Investment Program key facts

- Interim Trustee: World Bank
- Money raised: US$639
- Safeguards: it has guidelines on "inclusion of relevant stakeholders" but at the local level the safeguards of each MDB are to be implemented. No recognition of FPIC
- In the FIP Sub-Committee meetings 2 civil society representatives and 2 alternates, and 2 Indigenous Peoples representatives are allowed as observers

4. The Forest Carbon Partnership Facility

The Forest Carbon Partnership Facility (FCPF) was launched at UNFCCC COP 13 in Bali in 2007, after two years of consultations between the World Bank and a number of countries and organisations. It became operational in June 2008. The FCPF is a global partnership which basically helps countries to get ready for REDD+. The FCPF created a framework that is used by countries to develop reference scenarios, design monitoring systems, and adopt and set REDD+ national strategies. In other words, the FCPF helps to build capacity in developing countries and provides performance-based incentives at the national level and for pilot programs regarding REDD+.

4.1 *Structure and Organisation*

The FCPC is operationalised through two funding mechanisms, the Readiness Fund and the Carbon Fund, and both of them have the World Bank as the administering Trustee. The Readiness Fund

[70] https://www.climateinvestmentfunds.org/cif/sites/climateinvestmentfunds.org/files/FIP_Design_Document_July_final.pdf

[71] For detailed information on the FIP´s design document see https://www.climateinvestmentfunds.org/cif/sites/climateinvestmentfunds.org/files/FIP_Design_Document_July_final.pdf

[72] *http://www.brettonwoodsproject.org/2013/10/forest-investment-program-fip/*

"supports tropical and sub-tropical developing countries in preparing themselves to participate in a future, large-scale, system of positive incentives for REDD+. This includes: adopting national REDD+ strategies; developing reference emission levels (RELs); designing measurement, reporting, and verification (MRV) systems; and setting up REDD+ national management arrangements, including proper environmental and social safeguards." [73] The Carbon Fund aims to remunerate countries that have made significant progress in their REDD+ readiness endeavours.

In the FCPF there are three different categories of participants: REDD+ country participants (developing countries that participate in and receive funds from the Readiness Fund, currently 44 countries);[74] donor participants (countries that contribute to the Readiness Fund);[75] and carbon fund participants (participants that contribute to the Carbon Fund, which can be the public sector but can also include the private sector and NGOs).[76]

The FCPF is mainly articulated through the Participants Assembly and the Participants Committee. The former is comprised of all the countries and organisations that participate in the FCPF. The latter is formed by 14 REDD+ countries and 14 financial contributors (whether these are public, private or NGOs) as well as observers from the UN-REDD Programme, the UNFCCC Secretariat, the private sector, indigenous peoples and CSOs. The Participants Committee constitutes the day-to-day decision making body of the FCPF. During the meetings of the Participants Committee, observers are allowed and they can express their views on the issues that are being discussed. However, observers are not allowed to vote in decision-making processes.[77] In addition, there are ad hoc Technical Advisory Panels made up of individual experts to advise the FCPF on specific issues. The World Bank is the Trustee of both the Readiness and Carbon Funds.[78]

The FCPF has 15 financial contributors, including developed countries, private sector participants and one NGO. At the time of writing, the FCPF has raised a total of US$825 million from which US$360 million has been allocated to the Readiness Fund and US$465 million to the Carbon Fund.[79]

4.2. Safeguards and Participation

The World Bank plays a very substantial role in the functioning of the FCPF since it assumes, among other things, the functions of both Secretariat and Trustee. As explained above, the World Bank has developed a series of safeguards policies classified under the following categories: environmental assessments, natural habitats, forests, physical cultural resources, involuntary resettlement and indigenous peoples. The safeguard related to Indigenous Peoples reads as follows:

[73] https://www.forestcarbonpartnership.org/readiness-fund-0
[74] https://www.forestcarbonpartnership.org/redd-country-participants
[75] https://www.forestcarbonpartnership.org/donor-participants#overlay-context=donor-participants-0
[76] https://www.forestcarbonpartnership.org/carbon-fund-participants
[77] https://www.forestcarbonpartnership.org/official-observers
[78] https://www.forestcarbonpartnership.org/participants-page
[79] https://www.forestcarbonpartnership.org/about-fcpf-0

"to design and implement projects/strategies with the full and effective participation of Indigenous Peoples in a way that fosters full respect for Indigenous Peoples' dignity, human rights, traditional knowledge, and cultural uniqueness and diversity and so that they: (i) receive culturally compatible social and economic benefits; and (ii) do not suffer adverse effects during the development process." [80]

These safeguards should serve as guidelines for all the World Bank funded projects in their identification, preparation and implementation. However, this does not mean that these safeguards have to be applied to FCPF REDD+ readiness activities and there has been a lot of confusion around this issue. The World Bank has argued that *"REDD readiness is not a World-Bank funded project but rather financial assistance from a multi-lateral fund for capacity building and therefore safeguards cannot be applied in the traditional sense.*" [81]

Therefore, and as a way of trying to ensure uniformity in the set of safeguards, the FCPF Readiness Fund developed the 'Common-Approach to Environmental and Social Safeguards for Multiple Delivery Partners.' The goal of these safeguards and related policies is "*to avoid, mitigate, or minimize adverse environmental and social impacts of projects and strategies, and to implement projects and strategies that produce positive outcomes for people and the environment". The Delivery Partners can follow their own "fiduciary framework, regulations, rules, policies, guidelines and procedures in administering the funds transferred by the Trustee".* However, in following this Common Approach, Delivery Partners *"shall achieve substantial equivalence which means equivalence to the material elements of the WB's environmental and social safeguard policies and procedures applicable to the FCPF Readiness Fund ("Substantial Equivalence") during the administration of the FCPF Readiness Preparation grant agreement and by complying with FCPF requirements that are in place at the time of signing of their respective Transfer Agreement."* [82] Requirements for Strategic Environmental and Social Assessments (SESAs) and Environmental and Social Management Frameworks (ESMFs) and Guidelines on Stakeholder Engagement in REDD+ Readiness are all FCPC requirements and were developed under the Common Approach.

Related to Indigenous Peoples, the Environmental and Social safeguards in the FCPF Readiness Fund reads as follows: "*To design and implement projects/strategies with the full and effective participation of Indigenous Peoples in a way that fosters full respect for Indigenous Peoples' dignity, human rights, traditional knowledge, and cultural uniqueness and diversity and so that they: (i) receive culturally compatible social and economic benefits; and (ii) do not suffer adverse effects during the development process.*"

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[80] http://www.forestcarbonpartnership.org/sites/forestcarbonpartnership.org/files/Documents/PDF/Nov2011/FCPF%20Readiness%20Fund%20Common%20Approach%20_Final_%2010-Aug-2011_Revised.pdf

[81] http://www.bicusa.org/wp-content/uploads/2013/01/SESA+informational+doc+for+PC6.pdf

[82] http://www.forestcarbonpartnership.org/sites/forestcarbonpartnership.org/files/Documents/PDF/Nov2011/FCPF%20Readiness%20Fund%20Common%20Approach%20_Final_%2010-Aug-2011_Revised.pdf

Moreover, the main goal of a SESA assessment is "*to ensure that environmental and social concerns are integrated into the national REDD+ strategy process and that the FCPF readiness activities comply with applicable safeguards.*"

The resulting ESMF framework constitutes an output of the SESA assessment, and its main goal is to *"provide a framework for managing and mitigating the potential environmental and social impacts and risks related to policy changes, investments and carbon finance transactions in the context of the future implementation of REDD+."* However, concerns have been raised by many, arguing that the SESA is a weak model for mitigation and assessment that can be used in place of other more stringent safeguards. There also seems to be a lack of clarity in regard to accountability and decision-making.[83] In addition, SESA has been criticised because although it seems that it could constitute a tool for Indigenous Peoples to provide inputs, on many occasions their eligibility to participate in both SESA and ESMF processes has not been clear.[84]

Under the 'Common Approach to Environmental and Social Safeguards for Multiple Delivery Partners', there are also safeguards related to Stakeholder Engagement in REDD+ Readiness and Disclosure of Information.

Regarding stakeholder engagement, the FCPC and UN-REDD Programme elaborated the 'Guidelines on Stakeholder Engagement in REDD+ Readiness' jointly. These guidelines have a focus on Indigenous Peoples and other forest-dependent communities. They guidelines state that FCPF activities that affect Indigenous Peoples are governed by the 4.10 World Bank Operational Policy which aims to "*ensure that the development process fully respects the dignity, human rights, economies, and cultures of indigenous peoples.*" It also states that "*the Bank provides financing only where free, prior, and informed consultation results in broad community support to the project by the affected indigenous peoples.*" [12] It also states that if the policies of the Delivery Partner related to this issue are more stringent than those set by the World Bank, then the Delivery Partner should implement its own safeguards.

The so-called "Guidance on Disclosure of Information" (also included under the Common Approach as mentioned above) also provides for additional guidance for disclosure of FCPF-related documents under the FCPF Readiness Fund in line with the World Bank's policy on Access to Information, IDB's Access to Information policy, and UNDP's Information Disclosure policy. [85]

Overall, the disclosure media is the website and the time of disclosure varies depending on the type of document. For some documents such as the Draft R-PIN (Readiness Plan Idea Note) or the R-PP (Readiness Preparation Plan) the time is 14 days prior to the relevant Participants Committee

[83] http://www.bicusa.org/wp-content/uploads/2013/01/SESA+informational+doc+for+PC6.pdf
[84] http://www.forestpeoples.org/topics/forest-carbon-partnership-facility-fcpf/news/2013/04/safeguards-redd-financing-schemes
[85] http://www.forestcarbonpartnership.org/sites/forestcarbonpartnership.org/files/Documents/PDF/Jun2011/Attachment%203%20Disclosure%20Guidance%20June_3_2011.pdf

meeting, for other documents such as the R-PP Assessment it is 30 days after the signature of the grant agreement.[86]

The FCPF has been frequently criticised for several reasons. One of them is that its safeguards do not sufficiently address human rights and are not fully consistent with international human rights obligations.[87] Another common criticism is the failure of the FCPF implementing safeguards related to the consultation and participation of Indigenous Peoples and forest-dependent communities.[88] For instance, in 2012 in Honduras the Indigenous Peoples Confederation of Honduras (CONPAH) wrote a letter to the government asking for the withdrawal of the R-PP due to the lack of consultation and participation of Indigenous Peoples.[89]

The Forest Peoples Programme (FPP) and FERN elaborated a report that exposes some of the failures of the FCPF and World Bank, which have been experienced in many countries. This includes a failure to address land rights, lack of respect for indigenous rights, and inadequate and insufficient consultation processes with CSOs and IPOs. This report also mentions that many proposals made by Indigenous Peoples, local communities and civil society have been ignored (eg. in Peru).[90]

Box 6. Forest Carbon Partnership Facility key facts

- World Bank as Administering Trustee
- Money raised US$825 million
- Safeguards: for REDD+ readiness activities the FCPF developed the 'Common-Approach to Environmental and Social Safeguards for Multiple Delivery Partners' which includes safeguards related to Stakeholder Engagement and Disclosure of Information
- For other projects funded by the FCPC (like those that fall under the Carbon Fund) the World Bank safeguards policies are to be implemented.
- In the Participants Assembly and Participants Committee observers from CSOs and IPs are allowed but with no right to vote

5. UN-REDD Programme

UN-REDD stands for United Nations collaborative initiative on Reducing Emissions from Deforestation and forest Degradation in developing countries. It was launched in 2008 as a partnership between the Food and Agriculture Organization (FAO), the United Nations Development Programme (UNDP) and the United Nations Environment Programme (UNEP). The UN-REDD Programme aims to support national REDD+ readiness efforts following a rights-based

[86] For more detailed information see http://www.forestcarbonpartnership.org/sites/fcp/files/Documents/tagged/Attachment%203%20Disclosure%20Guidance%20June_3_2011.pdf
[87] http://www.climatefundsupdate.org/listing/forest-carbon-partnership-facility
[88] http://www.forestpeoples.org/topics/climate-forests/world-bank/forest-carbon-partnership-facility-fcpf
[89] http://www.redd-monitor.org/2012/02/29/world-banks-fcpf-fails-to-consult-with-indigenous-peoples-inhonduras/
[90] http://www.forestpeoples.org/sites/fpp/files/publication/2011/03/smokeandmirrorsinternet.pdf

approach. Currently there are 56 UN-REDD partner countries of which 21 are receiving support for their national REDD+ programmes.[91]

5.1. Structure and Organisation

The UN-REDD Programme is articulated through a Policy Board in charge of approving financial allocations and providing strategic support to guarantee the success of the Programme. The Policy Board is formed of representatives from partner countries, donors to the Multi-Partner Trust Fund, civil society, Indigenous Peoples and the three Participating UN organisations (FAO, UNDP and UNEP). The Board is co-chaired by a representative of either FAO, UNDP or UNEP and a representative from a UN-REDD pilot country (which changes every year). Regarding Indigenous Peoples, there is one representative that is chosen by the UN Permanent Forum on Indigenous Issues. There is another representative for CSOs. Moreover, there are also three observers that represent Indigenous Peoples and three more for CSOs, as well as selected observers from UNFCCC, GEF and the FCPF. These observers are invited by the co-chairs to take part in some of the Board deliberations.[92]

To date, a total of US$215.2 million has already been raised by UN-REDD Programme. Currently, Denmark, the European Union, Japan, Luxembourg, Norway and Spain are the UN-REDD Programme's main donors and according to UN-REDD, 91% of the donations have already been allocated to assist partner countries in their REDD+ readiness activities.[93]

5.2. Safeguards and participation

The UN-REDD Programme has developed 'Social and Environmental Principles and Criteria' which aim to avoid negative impacts derived from REDD+ implementation. This basically consists of seven overarching principles and 24 specific criteria. In addition these principles and criteria *"draw on, are consistent with, and seek to help countries meet their commitment to, inter alia, the following international agreements"*: United Nations Framework Convention on Climate Change (UNFCCC), Convention on Biological Diversity (CBD), Non-Legally Binding Instrument on all Types of Forest (NLBI), Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), International Labour Organization Convention 169 (ILO 169), United Nations Convention Against Corruption (UNCAC), United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), United Nations Convention on the Elimination of All Forms of Racial Discrimination (UNCERD) and the Millennium Development Goals (MDGs).[94]

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[91] http://www.un-redd.org/Partner_Countries/tabid/102663/Default.aspx
[92] http://www.unredd.org/ProductsandPublications/UNREDDProgrammeEngagementofIndigenousPeople/tabid/616/language/en-US/Default.aspx)
[93] http://www.un-redd.org/Donors_and_Partners/tabid/102612/Default.aspx.
[94] http://www.unredd.org/Multiple_Benefits_SEPC/tabid/54130/Default.aspx

Box7. International Tropical Timber Organization (ITTO)

Another organisation that is worth mentioning briefly is the International Tropical Timber Organization (ITTO). This is an intergovernmental organisation that was created in 1986 due to growing concern about forests. It is primarily concerned with the industry and trade of tropical timber, but also pays attention to the management of natural resources. ITTO mainly develops internationally agreed policy documents regarding sustainable forest management and forest conservation, and assists countries to adapt and implement those policies. Since 1987, the year in which it became operational, more than 800 projects, pre-projects and activities have been funded by ITTO, at a cost of approximately US$300 million. In addition to sustainable forest management, ITTO also has a window for climate change which has a Thematic Programme on Reducing Deforestation and Forest Degradation and Enhancing Environmental Services (REDDES) which aims to reduce deforestation and forest degradation, enhance environmental services and help improve the livelihoods of forest dependent communities through conservation and sustainable use of tropical forest resources, forest restoration and other related activities in a landscape planning approach. (http://www.itto.int/climate_change/).

UN-REDD's seven overarching principles are the following: democratic governance; stakeholder rights; sustainable livelihoods; contribution to low-carbon sustainable development policies; climate-resilient sustainable development policy; protection of natural forest from degradation and conversion; maintenance/enhancement of forest functions; and the avoidance of adverse impacts of non-forest ecosystem services.

Related to Indigenous Peoples, local communities and women, Principle 2 reads as follows, "*Respect and protect stakeholder rights in accordance with international obligations."* The specific relevant criteria are:

> *"Criterion 7 – Respect and promote the recognition and exercise of the rights of indigenous peoples, local communities and other vulnerable and marginalized groups to land, territories and resources, including carbon*
>
> *Criterion 8 – Promote and enhance gender equality, gender equity and women's empowerment*
>
> *Criterion 9 – Seek free, prior and informed consent of indigenous peoples and respect and uphold the decision taken (whether consent is given or withheld)*
>
> *Criterion 10 – Ensure there is no involuntary resettlement as a result of REDD+*
>
> *Criterion 11 – Respect and protect traditional knowledge, and cultural heritage and practices"*

In addition, the UN-REDD Programme (jointly with the FCPF, as explained above) has developed a set of 'Guidelines on Stakeholder Engagement in REDD+' which focus on the participation of Indigenous Peoples and other forest-dependent communities. These reiterate the commitment to UN Development Group Guidelines on Indigenous Peoples Issues[95] and UNDRIPs, including the right to Free, Prior and Informed Consent. In fact, the UN-REDD Programme took a step further and, based on the 'Guidelines on Stakeholder Engagement in REDD+', launched 'Guidelines on Free, Prior and Informed Consent' in 2013. In this second set of guidelines, the UN-REDD

[95]The UN Development Group Guidelines on Indigenous Peoples Issues can be found via http://www2.ohchr.org/english/issues/indigenous/docs/guidelines.pdf

Programme adheres to the definition of FPIC endorsed by the United Nations Permanent Forum on Indigenous Issues (UNPFII) at its Fourth Session in 2005, which is the following:

- Free: "*refers to a consent given voluntarily and absent of coercion, intimidation or manipulation. Free refers to a process that is self-directed by the community from whom consent is being sought, unencumbered by coercion, expectations or timelines that are externally imposed.*"
- Prior: *"means consent is sought sufficiently in advance of any authorization or commencement of activities. Prior refers to a period of time in advance of an activity or process when consent should be sought, as well as the period between when consent is sought and when consent is given or withheld. Prior means at the early stages of a development or investment plan, not only when the need arises to obtain approval from the community."*
- Informed: *"refers mainly to the nature of the engagement and type of information that should be provided prior to seeking consent and also as part of the ongoing consent process."*
- Consent: *"refers to the collective decision made by the rights-holders and reached through the customary decision-making processes of the affected peoples or communities. Consent must be sought and granted or withheld according to the unique formal or informal political-administrative dynamic of each community."*

The 'Guidelines on Free, Prior and Informed Consent' document is meant to provide a framework for the full and effective participation of Indigenous Peoples, local communities and women (including through effective information disclosure and the establishment of appropriate channels to disseminate information among stakeholders in a timely manner). However, the implementation of safeguards and guidelines has still been problematic and UN-REDD lacks effective mechanisms to enforce the rules and commitments made.

A notorious and recent case was that of Panama's Indigenous Peoples Coordinating Body (COONAPIP) withdrawing from the UN-REDD Programme in 2013. This organisation claimed that *"UN-REDD "does not currently offer guarantees for respecting indigenous rights [nor for] the full and effective participation of the Indigenous Peoples of Panama."* [96] This happened shortly after the release of the UN-REDD Guidelines on Free, Prior and Informed Consent.

The UN-REDD Programme has also admitted that in Vietnam the FPIC processes were weak and failed to explain to the communities the risks and costs of REDD+.[97] Indigenous Peoples Organisations have argued that in several countries REDD+ activities have not complied with FCIP and that in ten countries with REDD programmes, FPIC has been violated.[98]

[96] http://www.redd-monitor.org/2013/03/06/coonapip-panamas-indigenous-peoples-coordinating-body-withdraws-from-un-redd/
[97] http://www.forestpeoples.org/topics/forest-carbon-partnership-facility-fcpf/news/2013/04/safeguards-redd-financing-schemes
[98] http://firstpeoples.org/wp/does-un-redd-help-or-hurt-indigenous-peoples/

Box 8. UN-REDD Programme key facts

- Multi-partnered Trust Fund
- Money raised : US$215.2 million
- Safeguards: 'Social and Environmental Principles and Criteria' + 'Guidelines on Stakeholder Engagement in REDD+ (same guidelines as for the FCPF)+ 'Guidelines on Free, Prior and Informed Consent'
- 1 CSOs and 1 IPs representative in the Policy Board plus 3 observers from each of these groups

Conclusions

Global funds aimed at combating climate change and the conservation and protection of forests have been present in the international arena for several years. However there are significant questions about the governance and relevance of these funds, including whether they provide sufficient and appropriate economic or in-kind support for Indigenous Peoples, local communities, women and other vulnerable groups.

Of particular concern are the various—and generally weak—safeguards and participation mechanisms that have been developed by the funds. Without comprehensive and enforceable mechanisms there is a significant risk that the initiatives the funds support might trample the territorial and other rights of Indigenous Peoples, local communities and women.

For example, REDD+ initiatives can significantly increase the value of forest land, thereby increasing the risk that they will trigger so-called 'green land grabbing', as they become more economically attractive to potential carbon brokers and other actors, who may have little interest in existing customary and other land tenure rights. These actors want to acquire the rights to manage forest land so that they can sell the carbon credits derived from those lands.

The various global funds have different sets of participation and safeguards mechanisms. Those with weak safeguards and participation mechanisms are more likely to finance projects triggering human rights violations than those with stronger safeguards.

However, our analysis shows that even though many of these funds have been functional for many years they all still fail to a greater or lesser degree when it comes to ensuring respect for the rights and need of Indigenous Peoples, local communities and women.

While all the funds analysed do have, to some extent, participation and safeguard mechanisms, these are highly variable and their actual enforcement has been weak and even non-existent in some projects. Throughout this paper it has been shown that these funds have been heavily critiqued by CSOs and IPOs on many occasions due to a range of different issues relating to these vulnerable groups.

It is remarkable that even when funds have social safeguards concerning the importance of adhering to international human rights conventions, the language used is usually weak and some of them fail to specifically mention vulnerable groups such as local communities and women (although they do speak of Indigenous Peoples). In this regard, the GCF might provide a positive surprise. For instance, in its policy documents it has acknowledged from the beginning the relevance of mainstreaming gender aspects in all of its activities and projects. Yet the safeguards adopted by the GCF are still provisional and we will have to wait three years to know the final decision adopted on this issue.

In addition to the generally weak commitment to and language about ensuring and respecting vulnerable groups' rights and needs, there is a lot of confusion about what type of safeguards should be applied in a given project. This fact can be clearly seen, for instance, in the World Bank's FCPF Readiness Fund and Forest Investment Program (FIP), where safeguards and guidelines for participation are established internationally but when it comes to the local level the Delivery Partner can apply its own safeguards if they are more stringent (although in the policy documents it is not clear what is and what is not consider to be more or less stringent).

Similarly, safeguards were established for REDD+ in UNFCCC COP 16 in Cancun in 2010, but these are voluntary and when it comes to the national level, governments are supposed to interpret them and implement them according to their own "reading" of the safeguards.

Overall it is clear from our analysis that some climate finance funds have stronger safeguards than others. For instance, while the FIP establishes that at the local level Multilateral Development Banks should implement their own safeguards (whatever those safeguards are), others like the UN-REDD Programme have developed their own "Guidelines on Free, Prior and Informed Consent." However, when it comes to the actual and effective implementation of these guidelines, we find once again that problems have arisen with those affected by the funded projects (see COONAPIP example in Section 5). This shows, as has already been argued by many, that in addition to defining strong safeguards, appropriate means of implementation and enforcement are essential.

On the positive side, it seems that the Global Environment Facility's (GEF) Small Grants Programme (SGP) has been somewhat more successful in this respect. Although GEF safeguards are based on the World Bank´s policies (meaning that they are applied to the Small Grants Programme projects as well), this grant programme works in a rather decentralized manner and provides cash or in–kind contributions directly to communities and civil society organisations. Indeed, it has been identified by many not only as one of the most progressive GEF programmes, but as one of the more successful within the current international financial arena. In addition, some of the SGP projects specifically focus on the needs of women, which add more value to this programme.

However, this does not mean that the GEF SGP is a panacea that should be exactly replicated. As has been discussed above (see section 2), some CSOs and IPOs have expressed concerns with some of the programme's procedures. Although it seems to be taking the rights and needs of

Indigenous Peoples, local communities and women into account more seriously, we still need to be cautious and ensure that new safeguards are even stronger and more effectively enforced than those of the SGP. Therefore, the GCF could perhaps learn from and to a certain extent follow the model and functioning of the SGP in order to make a substantial contribution to the climate change agenda, while ensuring that vulnerable groups are not threatened and their voices are heard.
Moreover, the meaningful and effective participation of Indigenous Peoples, local communities, women and other vulnerable groups in the decision-making processes is very limited. The relevance of the participation mechanisms for these groups is evident since in most of cases they will be the ones affected by the activities financed by the funds. Yet, the opportunities for these groups to engage in decision-making process and provide inputs are very scarce and, even when they are allow to participate, the established mechanisms for this are dubious regarding its effectiveness. A clear example of this lack of meaningful participation mechanisms is the GCF, where only two civil society representatives are allowed to participate and Board meetings can only be followed live in an overflow room. In addition there are no specific slots for Indigenous Peoples, local communities and women. Regarding the allocation and effective distribution of money, funds generally place much more emphasis (and resources) on mitigation than on adaptation, and the private sector usually plays a big role. The involvement of the private sector in climate finance have been rightfully criticised due to, among other things, the general trend of this sector to leverage money for middle-income countries and mitigation projects where there may be more profitable investments. This also means that if the private sector plays a big role in these funding mechanisms, adaptation activities will most likely be left aside or receive less money, because they do not usually generate economic profits.

It is also remarkable that the World Bank plays, to different extents, a role in all of the analysed funds. For most of the funds it constitutes the Interim (e.g. GEF, FIP) or administrative (e.g. FCPF) Trustee and in some occasions it also has advisory functions. As a consequence the safeguards and participation mechanism of many of the funds draw on World Bank safeguards policies, which as it has been argued throughout this paper, are considered by, among others, CSOs and IPOs, as weak and insufficient.

In addition, there is a long track record of fossil fuel projects that have been promoted and funded by the World Bank, a fact that is worrisome, since such projects not only clearly contradict the main goals of the analysed funds but generally also pose threats for the livelihoods of Indigenous Peoples, local communities and women, and the protection and conservation of forests and other ecosystems where the projects take place. In other words, they run against the overall objective of combating climate change. With the GCF, we can see how the World Bank once again acts as Interim Trustee, with the consequent risks of making the same mistakes in terms of respecting the rights and needs of Indigenous Peoples, local communities and women.

ANNEX I. GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards. Minimum Standard 4: Indigenous Peoples

Criteria

"Established policies, procedures, and guidelines require the Agency to ensure projects are designed and implemented in such a way that fosters full respect for Indigenous Peoples' and their members' dignity, human rights, and cultural uniqueness so that they (a) receive culturally appropriate social and economic benefits; and (b) do not suffer adverse effects during the development process."

Minimum Requirements

"Screen early for the presence of Indigenous Peoples in the project area, who are identified through criteria that reflect their social and cultural distinctiveness. Such criteria may include: self-identification and identification by others as Indigenous Peoples, collective attachment to land, presence of customary institutions, indigenous language, and primarily subsistence-oriented production."

"Undertake free, prior, and informed consultations with affected Indigenous Peoples to ascertain their broad community support 34 for projects affecting them and to solicit their full and effective participation in designing, implementing, and monitoring measures to (a) ensure a positive engagement in the project (b) avoid adverse impacts, or when avoidance is not feasible, minimize, mitigate, or compensate for such effects; and (c) tailor benefits in a culturally appropriate way."

"Undertake the environmental and social impact assessment, with involvement of Indigenous Peoples, to assess potential impacts and risks when a project may have adverse impacts. Identify measures to avoid, minimize and/or mitigate adverse impacts".

"Provide socioeconomic benefits in ways that are culturally appropriate, and gender and generationally inclusive. Full consideration should be given to options preferred by the affected Indigenous Peoples for provision of benefits and mitigation measures".

"Make provisions in plans, where appropriate, to support activities to establish legal recognition of customary or traditional land tenure and management systems and collective rights used by project affected Indigenous Peoples".

"Where restriction of access of Indigenous Peoples to parks and protected areas is not avoidable, ensure that affected Indigenous Peoples fully and effectively participate in the design, implementation, monitoring and evaluation of management plans for such parks, protected areas, and species and share equitably in benefits from the parks and protected areas".

"Refrain from utilizing the cultural resources or knowledge of Indigenous Peoples without obtaining their prior agreement to such use".

"For those projects where the environmental and social impact assessment identifies adverse effects on Indigenous Peoples, Agency policies require that the project develop an Indigenous Peoples plan or a framework that (a) specifies measures to ensure that affected Indigenous

Peoples receive culturally appropriate benefits and (b) identifies measures to avoid, minimize, mitigate or compensate for any adverse effects, (c) includes measures for continued consultation during project implementation, grievance procedures, and monitoring and evaluation arrangements, and (d) specifies a budget and financing plan for implementing the planned measures. Such plans should draw on indigenous knowledge and be developed in with the full and effective participation of affected Indigenous Peoples".

"Disclose documentation of the consultation process and the required Indigenous Peoples plan or framework, in a timely manner, before appraisal formally begins, in a place accessible to key stakeholders, including project affected groups and CSOs, in a form and language understandable to them".

"Monitor, by experienced social scientists, the implementation of the project (and any required Indigenous Peoples plan or framework) and its benefits as well as challenging or negative impacts on Indigenous Peoples and address possible mitigation measures in a participatory manner".

Guidance for Applicability/Inapplicability

"Any Agency that desires to implement projects with activities in regions inhabited by Indigenous Peoples would need to meet this standard. The GEF Council or Accreditation Panel will only find this policy inapplicable if the Agency has not and most likely will not implement projects with activities in regions inhabited by Indigenous Peoples"

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