



Analysis of the IP Tracker Data on the GCF's Efforts to Benefit Indigenous Peoples

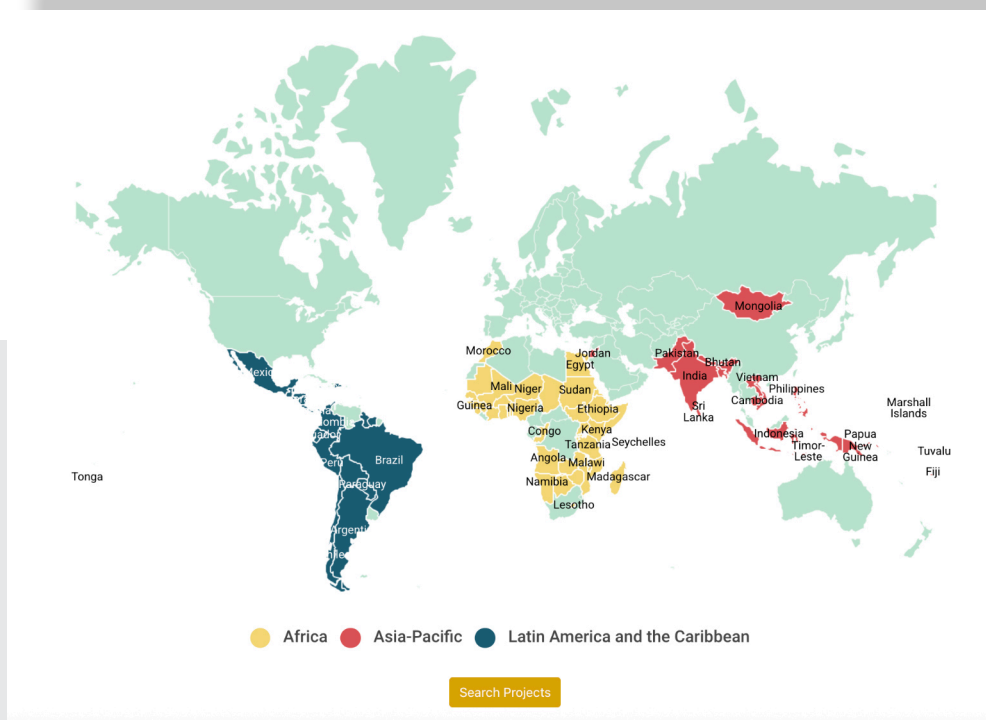
1 Introduction to Indigenous Peoples Tracker on GCF Projects

The Indigenous Peoples Tracker on GCF Projects (Tracker) is an initiative of Tebtebba and Elatia to establish a baseline information on and analysis of GCF approved projects that will potentially impact Indigenous Peoples positively or negatively.

This Tracker aims to monitor GCF projects that are and will be implemented and will impact Indigenous Peoples - the GCF IP Policy including the GCF IP Policy Toolkit, as reference points.

It uses the UN Declaration on the Rights of Indigenous Peoples as a standard for assessment and draws on the GCF Indigenous Peoples Policy (IPP) and the GCF Indigenous Peoples Policy Toolkit.

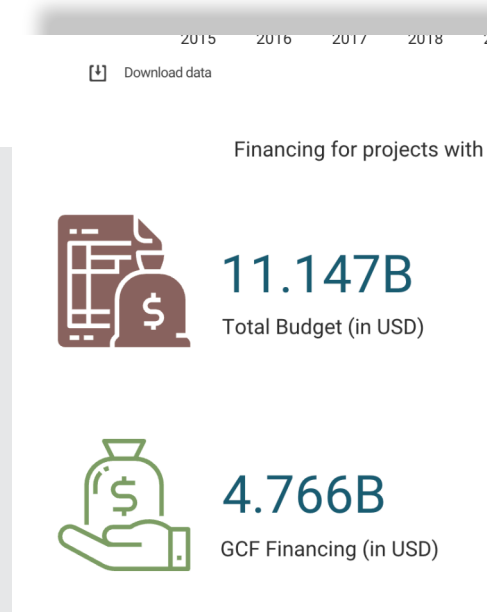
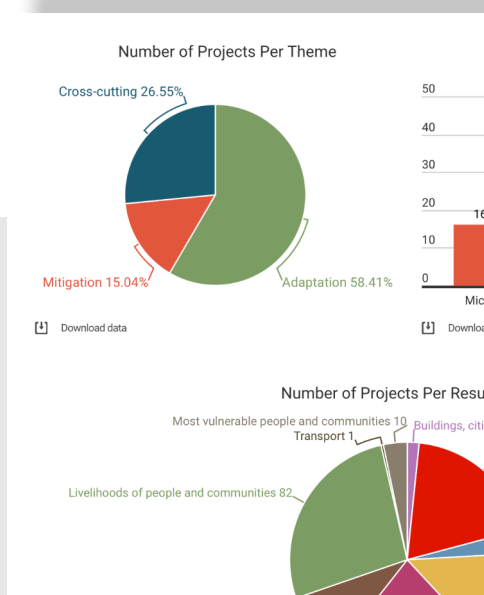
The Tracker focuses on GCF Funded Projects (FPs) and Simplified Approval Process (SAP) projects and does not include Readiness projects, Project Preparation Facility (PPF) grants, and Project-Specific Assessment Approaches (PSAAs) in its database, although it also monitors these modalities.



2 Methodology and Limitations

The Tracker is based on a detailed desktop review of publicly available documents, including project proposals, Indigenous Peoples' Plans, stakeholder engagement plans, environmental and social assessments, gender action plans, budgets, and Secretariat assessments. Additional sources also include the Annual Performance Reports (APRs), Independent Evaluation Unit (IEU) evaluations, the Open Data Library, Independent Redress Mechanism (IRM) cases, and Sectoral Guides.

However, it is important to acknowledge the limitations of the Tracker. It relies solely on document reviews, without the benefit of surveys, interviews, case studies, or field verification. Furthermore, there is a notable absence of required Indigenous Peoples-specific targets or indicators within the GCF projects, limited monitoring and reporting obligations concerning Indigenous issues, and a reliance on second-level due diligence by the GCF. APRs are largely self-reported, and the application of Free, Prior and Informed Consent (FPIC) is often treated as a one-time event rather than a continuous process. Risks of traditional knowledge (TK) misappropriation persist, the portfolio is still relatively immature, and identifying Indigenous Peoples and assessing their needs require specialized expertise. Additionally, the context and manner of project implementation can significantly affect the realization of Indigenous Peoples' rights and benefits.



3 Key Findings from the Tracker

Despite these limitations, the Tracker has yielded important insights. As of February 2025, approximately 113 GCF projects—representing 40.65% of the total GCF portfolio—have been identified as potentially affecting Indigenous Peoples, with a collective funding volume of USD 4.7 billion, or 29% of total GCF financing. These projects span across 90 countries, with notable regional distributions in Latin America and the Caribbean (38 projects in 24 countries), Africa (53 projects in 41 countries), and Asia-Pacific (37 projects in 23 countries).¹

One striking finding is that no Indigenous Peoples' organizations have been accredited as GCF entities, nor have they applied for accreditation. Organizations with the capacity to pursue accreditation have refrained from doing so, citing the burdensome process, uncertain outcomes, and difficulties in generating sufficient projects to justify the investment. Similarly, there are no Indigenous-led executing entities across the GCF project portfolio.

Resources dedicated to supporting Indigenous Peoples engagement in projects—such as translation services, community stakeholder engagement, iterative Free, Prior and Informed Consent (FPIC) implementation, appointment of Indigenous experts, and targeted gender and grievance mechanisms—appear sparse or non-existent. This lack of explicit resource allocation suggests that Indigenous Peoples are often treated as passive beneficiaries rather than active partners in GCF projects, undermining both project quality and sustainability.

Moreover, few projects include specific outputs, outcomes, or impact indicators focused on Indigenous Peoples. The APR process also fails to track or report on Indigenous Peoples' participation or benefits systematically. While there have been some promising examples of Readiness support geared toward Indigenous Peoples—notably through FAO's initiative in Nicaragua and Funbio's project in Colombia—these cases remain the exception rather than the rule.

The GCF Readiness and Preparatory Support Programme (Readiness Programme) is designed to build the institutional capacities of countries to access and manage GCF resources effectively. It provides grants to enhance strategic frameworks, strengthen National Designated Authorities (NDAs), support



¹ There are projects which are spread out in multiple countries and regions, hence the difference in the total number of projects.



Targeted Readiness support would also align with additional commitments under the GCF Indigenous Peoples Policy (IPP). Paragraph 98 of the IPP provides that the GCF will give consideration to activities that are tailored to meet the needs and priorities of Indigenous Peoples and to support their initiatives and efforts for climate change mitigation and adaptation actions. Paragraph 99 further states that the GCF may target funds to support Indigenous Peoples initiatives if it is necessary to correct for climate change-exacerbated inequalities or if Indigenous Peoples are not adequately benefiting from GCF support. Finally, Paragraph 100 provides that the GCF Board may consider giving additional weight to activities that promote Indigenous Peoples' engagement and benefits. Collectively, these provisions reinforce the strong foundation within existing GCF policies for significantly expanding targeted Readiness support to Indigenous Peoples, an opportunity that remains underdeveloped.

It is increasingly clear from the Tracker's findings that the existing GCF mechanisms are not sufficient to ensure meaningful participation and tangible benefits for Indigenous Peoples. Without a dedicated approach, Indigenous Peoples remain at the margins of GCF-funded climate action, unable to fully realize the benefits intended by the Fund. A dedicated Indigenous Peoples' window would directly address this challenge by establishing mechanisms tailored to Indigenous contexts, allowing for simplified and flexible access to funding, culturally appropriate project design, and sustained engagement throughout project cycles. Such a window could facilitate the allocation of targeted resources for capacity-building, ensure continuous application of FPIC, embed Indigenous knowledge systems into climate solutions, and foster leadership opportunities for Indigenous women and youth. This approach would also enable the development of specific monitoring indicators to measure impacts and benefits for Indigenous Peoples, thereby acknowledging their leadership from passive recipients to active architects of climate resilience and low-carbon development. Without such structural changes, Indigenous participation will remain tokenistic and fragmented, and the GCF will fall short of fulfilling its commitment to inclusivity and equity.

4 Broader Institutional Awareness and Evaluation Findings

In addition to the Tracker's findings, institutional evaluations have echoed many of these concerns. In 2024, the GCF's Independent Evaluation Unit (IEU) conducted a comprehensive evaluation of the GCF approach to Indigenous Peoples. The outcomes of this evaluation broadly corroborated the findings of the Tracker and provided an independent confirmation of the systemic issues affecting Indigenous engagement within the GCF.

The IEU evaluation revealed significant gaps in monitoring and tracking Indigenous Peoples' outcomes, highlighted the barriers created by the GCF's National Designated Authority (NDA)-centered and accreditation-based model, and noted that the GCF's alternative access modalities (such as SAPs and PSAAs) do not adequately integrate Indigenous Peoples' considerations. Moreover, the evaluation emphasized that Readiness Programme support, while potentially effective, has so far been deployed opportunistically rather than systematically to advance Indigenous priorities.

The findings showed that the GCF's commitment to Indigenous Peoples is often limited by national contexts and that FPIC is too frequently treated as a procedural requirement at project origination, rather than as an ongoing negotiation process through implementation. Overall, the evaluation concluded that inconsistencies in oversight after project approval made it difficult to assess the actual effectiveness of the Indigenous Peoples Policy.

Crucially, the IEU's Recommendation 4—to establish an Indigenous Peoples-specific window or programme—directly addresses these structural barriers. Without a targeted and dedicated mechanism, Indigenous Peoples will continue to struggle to benefit fully from GCF initiatives, despite their central role in effective climate action.

In response to these evaluations and findings, the GCF Indigenous Peoples Advisory Group (IPAG) has strongly endorsed the need for fundamental reforms. IPAG's statement to the GCF Board emphasized that operationalizing a dedicated Indigenous Peoples-specific window is not merely desirable, but essential. While mainstreaming Indigenous engagement across GCF activities remains important, it cannot substitute for dedicated, intentional, and focused support mechanisms that specifically respond to the unique circumstances, needs, and aspirations of Indigenous communities.



IPAG stressed the need for the development of clear targets, indicators, disaggregated data, and specific resources to support continuous FPIC processes. Furthermore, it emphasized the necessity of greater integration of Indigenous knowledge into project development and implementation, and called for a shift from generic capacity-building initiatives toward programs that proactively empower Indigenous women in leadership, decision-making, and livelihood opportunities.

A wide range of studies and high-level platforms — including the last three COP presidencies, the UN Permanent Forum on Indigenous Issues (UNPFII), successive reports from the UN Special Rapporteurs on the Rights of Indigenous Peoples (notably Victoria Tauli-Corpuz and José Francisco Calí Tzay), the Forest and Climate Leaders' Partnership (FCLP), the Climate Champions Global Data Study, and the Rights and Resources Initiative (RRI) — have repeatedly drawn attention to the persistent gaps in climate finance reaching Indigenous communities. Collectively, these initiatives have underscored the urgent need for the Green Climate Fund (GCF) to establish a dedicated Indigenous Peoples' window to ensure equitable access to and effective participation in climate finance mechanisms.

Indigenous Peoples

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for GCF Projects

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List of GCF Projects with potential impact to indigenous peoples

(All projects included in this tracker are based on GCF-Approved Funding proposals as of December 31, 2021)

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[FP001 - Peru] Building the Resilience of Wetlands in the Province of Datem del Marañón, Peru

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[FP004 - Bangladesh] Climate-Resilient Infrastructure Mainstreaming (CRIM)

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5 Conclusions

Indigenous Peoples have invaluable and critical contributions to make in addressing climate change around the world. The Tracker, the IEU evaluation, and IPAG's responses converge on a clear and urgent conclusion: while GCF support and leadership in promoting Indigenous engagement have made commendable strides, significant structural and systemic changes are still required. The establishment of a dedicated Indigenous Peoples window is not only an acknowledgment of these shortcomings but a crucial step toward ensuring real and lasting inclusion, empowerment, and partnership. Indigenous Peoples are ready to play their role; it is now essential that the GCF implements the recommendations of the Evaluation and ensures that Indigenous rights, priorities, and knowledge are fully integrated into its operations.

Without the establishment of a dedicated Indigenous Peoples' window, the GCF risks perpetuating a cycle where Indigenous Peoples are marginalized within climate finance structures that are meant to empower them. A fundamental shift is needed to ensure that Indigenous Peoples are not only included but are key partners and actors in the fight against climate change.

