

July 12, 2019

**The Secretariat
Green Climate Fund
G-tower, Songdo-daero
Incheon, Republic of Korea**

Dear Sirs and Madams,

With the following note and Annex, we submit our comments to the draft Operational Guidelines of the GCF Indigenous Peoples policy. We commend the Secretariat for this further step towards implementation of the Policy. In the meantime, the Secretariat has hired the Indigenous Peoples Specialist/focal point, and we would like to take this chance to welcome this further important step towards operationalizing the Policy.

First of all, we wish to recognize the hard work put by the Secretariat on developing this important tool. The Indigenous Peoples Advocacy Team have revised the guidelines and received important advice and comments from allies such as Indigenous Work Group on Indigenous Affairs (IWGIA) and Forest Peoples Programme (FPP). We believe that the adoption of the GCF indigenous peoples Policy of the Green Climate Fund on February 2018 shows the Fund's intention not only to avoid harm but also to do good and uphold international best standards. Since then, we have observed some important improvements such as the inclusion of the Policy as a benchmark for ITAP's assessment of funding proposals in B 23. We also think that the Operational Guidelines offer an important occasion to clarify crucial matters related to FPIC in the light of the recent IRM opinion on the Profonampe case, and to further refine aspects related to the recognition of the indigenous peoples' proactive contributions and key role of the knowledge of indigenous peoples to the Fund's goals.

Indeed, some further work will be required to provide clarity and guidelines on how the policy would assist entities and governments in its operationalization at the national and subnational levels. We therefore welcome the call for open submissions of board members, AEs and NDAs and CSOs as an opportunity to enrich and clarify the draft guideline as well as develop a strong sense of ownership that is key for a successful application and compliance.

We have also been sharing our views on this important document with our allies in the CSOs constituency and we fully support and endorse their submission.

Thanking for the attention, and looking forward to further collaboration and opportunities for constructive dialogue.

Sincerely Yours,
Helen Bingalen-Magata
on behalf of the IP Advocacy team

**INDIGENOUS PEOPLES' COMMENTS ON THE DRAFT INDIGENOUS PEOPLES'
POLICY OPERATIONAL GUIDELINES**

Para 4. (page 1) The Guidelines also are supplemented by the following:

- a. *Other guidance notes and interpretation notes currently established and/or will be developed in relation to the ESMS, environmental and social safeguards (ESS) and other relevant policies;*
- b. *General and sector environmental, health and safety (EHS) guidelines;*
- c. *Good practice notes (i.e., stakeholder engagement, grievance redress, resettlement planning, and other thematic notes) that are developed by GCF or other institutions that may be relevant to GCF activities;*
- d. *GCF Operations Manual for the Project and Programme Lifecycle; and*
- e. *Forms, templates, questionnaires for due diligence.*
- f. *(page 1)*

COMMENT: IP policy guidelines should be supplemented also by parameters and indicators for due diligence

- (e) *Supporting the establishment of the Indigenous Peoples Advisory Group (IPAG) to assist with implementing, developing and raising awareness of the Policy; (page 1)*

COMMENT: IPAG should also be supported not only established

- (g) *Collecting baseline data, and to (i) determine how the GCF can improve its response to the needs of indigenous peoples; (ii) identify the drivers of change in order to achieve (page 1)*

COMMENT: Collection of data should not only relate to needs but also priorities for Indigenous Peoples

- (k) *Engagement with UNFCCC Local Communities and Indigenous Peoples Platform; (page 2)*

COMMENT: and strive to mainstream the knowledge of indigenous peoples' traditional knowledge in GCF supported programmes and policies recognizing indigenous peoples' positive contribution to the GCF goals and to climate mitigation and adaptation as a whole

In assisting the accredited entity to meet the requirements of the Policy, GCF will take into account variables such as host country context, the scale and complexity of project impacts, and the associated cost-benefit considerations, as well as those of project performance beyond the level required in the Policy. (page 2)

COMMENT: GCF should be expected also to ensure that AEs comply with IP policy in accordance with relevant international standards, norms and practices. In case government legislation is inconsistent with IP policy requirements, AE should ensure that it complies with IP policy without contravening national law but in any case – as also prescribed in the IP Policy – “without contravening the applicable laws or the obligations of the state directly applicable to the activities under relevant international treaties and agreements”.

The overall objective of the Policy is to provide a framework for ensuring that GCF activities are developed 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. (page 3)

COMMENT: Clarify that the overall objective of the IP Policy spans across all GCF processes and programs

16. Where potential impacts on indigenous peoples have been identified, accredited entities with indigenous peoples will prepare an Indigenous Peoples Plan (IPP) or, if specific activities or locations have not yet been determined, an Indigenous Peoples Planning Framework (IPPF). The scope and scale of the Plan or Framework will be proportionate to the potential risks and impacts of the project.

(page 3)

COMMENT: Scope of IPP proportionate to risks but also benefits for IPs and IPP should be prepared for any activity planned in IP lands or related with IPs not only in case of potential impacts to IPs

1. The GCF recognizes that key United Nations (UN) human rights instruments form the core of international instruments that provide the rights framework for members of the world's indigenous peoples. The following is a list of UN instruments that are relevant to indigenous *peoples' issues*:⁴

(a) Convention against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment
Convention on the Elimination of All Forms of Discrimination against Women;

(b) Convention on the Rights of the Child;

(c) International Covenant on Civil and Political Rights;

(d) International Covenant on Economic, Social, and Cultural Rights;

(e) International Convention on the Elimination of All Forms of Racial Discrimination; and

(f) UN Declaration on the Rights of Indigenous Peoples.

(Page 5)

COMMENT: ILO169 to be included in list of instruments relevant to IP issues

The Policy also provides a framework for the GCF to endeavor to do good and ensure indigenous peoples benefit from the activities of the GCF. (page 5)

COMMENT: IP policy should indeed provide a framework to do good, ensuring that IPs benefit from GCF activities, but also recognize that IPs can actively contribute to GFC goals and support IP plans for integral management and protection of IP lands, territories and resources, such as Plans of Life, Planos de Vida or equivalent

In making this determination, the accredited entity should undertake a number of activities, including investigation of the applicable national laws and regulations (including obligations reflecting host country obligations under international law), archival research, ethnographic research (including documentation of culture, customs, institutions, customary laws, etc.) and participatory appraisal approaches with the indigenous peoples

(Page 6)

COMMENT: AEs should also carry out ethnographic research on self-governing, self-identification and collective customs of IPs

b) Groups that do not live on the lands affected by the project, but who retain ties to those lands through traditional ownership and/or customary usage, including seasonal or cyclical use;

(page 6)

COMMENT: Identification of collective attachment should also be extended to cultural and spiritual attachment

11. There is no hierarchy to the four characteristics and that all of them need to be present in varying degrees. "Varying degrees" (page 7)

COMMENT: Do they all need to be present?

12. The Policy is applicable to indigenous peoples who, by virtue of their economic, social, and legal status and/or their institutions, custom, culture and/or language may be characterized as distinct from mainstream society and who may be disadvantaged in the development process as a result of their identity

(page 7)

COMMENT: IP Policy is applicable to IPs also because they have been excluded and discriminated in development processes

14. The specialists should have proven familiarity with social science research methods, extensive knowledge and working experience with the subject of indigenous peoples in the country or region. Projects affecting indigenous peoples may also benefit from ongoing input from appropriate specialists, for example, in assisting an understanding of the characteristics (page 7)

COMMENT: IP specialists should be prioritized when deciding to engage specialists to provide technical advice and assistance regarding the application of the policy. IP governing institutions should also have a role in the process of identification and of assessment of vulnerabilities

15. The screening phase of the environmental and social risks and impacts assessment process should identify the existence of indigenous peoples in the project's area of influence that may be potentially affected by the accredited entity's project. If the screening identifies indigenous peoples, further analysis should be undertaken to collect baseline data on those communities, covering key aspects that may be affected by the project. The analysis should also identify the impacts and potential benefits of the project to indigenous peoples and consider ways to enhance them.

(page 8)

COMMENT: Screening of Social and environmental risks should identify impacts to IPs, consider ways to enhance potential benefits but also facilitate positive contributions from IPs

17. A key aspect of the assessment is understanding the relative vulnerabilities of the affected indigenous peoples and how the project may affect them. There needs to be a participatory process to define vulnerability and its criteria, such as a questionnaire or other tools developed in such a way that is understood and usable by communities. Training for trainers' session should also be envisaged. The analysis of vulnerability will include consideration of indigenous peoples':

(page 8)

COMMENT: Process of identification of vulnerabilities should be supported by providing resources to AE, NDA and be led by IPs

22. Accredited entities should prepare an Indigenous Peoples Plan (IPP) outlining the actions to avoid, minimize and/or compensate for adverse impacts in a culturally appropriate manner.

(page 9)

COMMENT: IPPs should also harness positive contributions of IPs and include relevant resource allocation and an assessment of and support to customary and traditional IP governing structures

23 (g) Tenure arrangements. Describe who has rights over the targeted project land, both in state laws and under customary law and how the legal status of the land will change under the project and what effect this has on rights-holders. (Page 10)

COMMENT: When dealing with tenure arrangements, take into account that in many cases IPs do not have documented rights over their lands

(h)... The grievance redress mechanism should provide for fair, transparent and timely redress of grievances without costs to those who raise grievances, and if necessary provide for special accommodations for women, youth and the elderly. (page 10)

COMMENT: When dealing with access to grievance mechanisms the GCF should ensure a zero-tolerance approach to any possible threat or retaliation to claimant (s), the same should apply for meaningful consultation. On the need for a GCF Human Rights Defenders policy see below

“Participatory monitoring such as community-based monitoring and information systems should be considered and supported. (page 10)

COMMENT: recognition of possible role for CBMIS should be accompanied by identification of modalities to ensure IP direct access to funding , the same applies for promotion of capacity building activities developed and implemented by IPs

In such circumstances, accredited entities should seek ways to comply with the requirements and to achieve the objectives of the Policy, without contravening applicable laws. (page 11)

COMMENT: "without contravening applicable laws or the obligations of the state directly applicable to the activities under relevant international treaties and agreements" (Note: this is the IP policy adopted formulation)

15. The screening phase of the environmental and social risks and impacts assessment process should identify the existence of indigenous peoples in the project’s area of influence that may be affected by the accredited entity’s project. If the screening identifies indigenous peoples, further analysis should be undertaken to collect baseline data on those communities, covering key aspects that may be affected by the project. (page 11)

COMMENT: Integral to the process of FPIC is the establishment, as early as possible, of collaborative and good faith relationships with the potentially impacted indigenous peoples. This ideally occurs at the screen stage, where indigenous peoples are actively engaged in validating the identification of them as potentially impacted by the project, and therefore potential interlocutors and/or partners in project activities. Early analysis of both impacts and potential benefits, and importantly ways to enhance benefits, should be undertaken in a participatory and partnered manner. It is therefore at this stage of project planning that consultative approaches should be introduced (i.e. ‘as early as possible in the project cycle’).

17. A key aspect of the assessment is understanding the relative vulnerabilities of the affected indigenous peoples and how the project may affect them. There needs to be a participatory process to define vulnerability and its criteria, such as a questionnaire or other tools developed in such a way that is understood and usable by communities (page 11)

COMMENT: vulnerability assessment should also incorporate assessment of indigenous peoples’ potential contribution and positive role in a project proposal, particularly those related to climate actions.

19. In certain circumstances, project benefits, such as enhancing access to roads, healthcare, and education, can have unintended adverse impacts on indigenous peoples due to their particular circumstances or vulnerabilities. These impacts may include loss of language and cultural norms, undermining of traditional governance structures, the creation of internal conflict, increased pressures and encroachment on lands, and pressures on or contamination of natural resources. The assessment identifies the potential for, and scale of, such adverse impacts and ways to avoid, mitigate or compensate for these impacts. (page 11)

COMMENT: The identification on culturally specific impacts can only be effectively done by the owners and practitioners of that culture. Impact assessments, if taking place at this early stage of project design, need to have built into them consultative exchanges and validation by the potentially impacted peoples and persons of the scope and nature of potential impacts, particularly those related to the exercise of cultural life.

22. If adverse impacts are unavoidable, accredited entities will minimize and/or compensate for these impacts in a manner commensurate with the nature and scale of impacts and the vulnerability of the indigenous peoples and in a gender-responsive and culturally appropriate manner acceptable to the indigenous peoples affected. Accredited entities must prepare an Indigenous Peoples Plan (IPP) outlining the actions to avoid, minimize and/or compensate for adverse impacts in a culturally appropriate manner. Depending on local circumstances, a standalone IPP may be prepared, or it may be a component of a broader community development plan where indigenous peoples exist in the same area with other similarly affected communities or where the indigenous peoples are integrated within a larger affected population. In all cases, evidence of the agreement for, and opportunities for input into, such plans by the potentially impacted indigenous peoples should be provided, as detailed below. (page 12)

COMMENT: evidence of the engagement of indigenous peoples in establishing the plan, and their agreement with its contents, should be required at the earliest opportunity. This may only be contingent support at this stage, as conditions for proceeding may be outlined by the peoples concerned. At this stage the contents of an IPP, of any form, should not be unknown to the potentially impacted peoples.

32. Eligibility for compensation may either be individual or collectively-based, or a combination of both. For example, with regard to land and natural resources, eligible indigenous peoples may include community members with hereditary rights of resource ownership (page 12)

COMMENT: IPs eligible for compensation should include community members with customary rights of resource ownership

23. The IPP is prepared in a flexible and pragmatic manner, and its level of detail varies depending on the specific project and the nature of the effects to be addressed. In general, and where appropriate, an IPP should include the following elements:

(a) Baseline information (from independent and participatory environmental and social risks and impacts assessment process) (page 13)

COMMENT: When developing an IPP relevant baseline information should also include information and data retrieved from Human Rights Impact Assessments

23 (e) Result of consultations (during environmental and social risks and impacts assessment process), the free, prior and informed consent and future engagement plans. Describe the process of information disclosure, consultation and informed participation and where relevant the FPIC process, including good faith negotiations and documented agreements with the indigenous peoples, and how issues raised have been addressed. The consultation framework for future engagement should clearly describe the process for ongoing consultations with, and participation by indigenous peoples (including women and men), in the process of implementing and operating the project. (page 13)

COMMENT: Even in the absence of a FPIC trigger, engagement and consultation plans are a critical piece of evidence for the strength of the local partnership and positive relationship with the concerned peoples.

23 (g) Tenure arrangements. Describe who has rights over the targeted project land, both in state laws and under customary law and how the legal status of the land will change under the project and what effect this has on rights-holders. (page 13)

COMMENT: Best practice in engagement with indigenous peoples in the context of an externally initiated project intervention (whether climate actions, development, conservation or other) is the potentially positive role a project proponent can play in securing insecure tenure. The current World Bank ESS7 requires that where tenure may be impacted, that the project proponent aid in securing formal recognition of customary tenure where possible. This may be considered also in the GCF implementation of the Indigenous Peoples Policy.

23 (h) (...) The grievance redress mechanism should provide for fair, transparent and timely redress to those who raise grievances, and if necessary provide for special accommodations for women, youth and the elderly, and other vulnerable groups within the community, to make their complaints. (page 13)

COMMENT: suggesting using ‘indigenous persons’ and ‘indigenous peoples’ to clarify when and where the singular individual rights are being referenced, and when collectively held and exercised rights area being referenced.

38. Accredited entities should adopt meaningful consultation approaches that build upon existing customary institutions and decision-making processes utilized by the indigenous peoples (page 13)

COMMENT: AEs should adopt meaningful consultations approaches together with IPs

technical support for local municipal authorities in facilitating community engagement and strengthening. (page 13)

COMMENT Technical support to local municipal authorities should also be extended to traditional IP governing structured and institutions

39. (...) in many cases, community elders or leaders, who are not necessarily the elected officials of these communities, play a key role. Furthermore, some segments of the community such as women, youth, and the elderly (page 14)

COMMENT: Vulnerable categories should include healers, preachers, spiritual leaders

Promote capacity building activities designed by indigenous peoples and indigenous peoples involvement (page 14)

COMMENT: Support IPs to identify issues and share their contribution in climate actions and projects

41. (f) Any engagement processes should aim to ensure that the entire population of indigenous peoples is aware of and understands the risks and impacts associated with project development; (page 14)

COMMENT: Consultation process should be accompanied by awareness raising and capacity building support to ensure that IPs can interact with AE

46. It is recognized that the definition and practices related to FPIC are evolving. FPIC comprises a process and an outcome. The process builds upon the requirements for meaningful consultation (which include requirements for free, prior and informed consultation and participation) and additionally requires good faith negotiation between the accredited entity and indigenous peoples. The outcome, where the good faith negotiation process is successful, is an agreement and evidence thereof. Good faith negotiation involves:

- (a) Willingness to engage in a process and availability to meet at reasonable times and frequency;
- (b) Provision of information necessary for informed negotiation;
- (c) Exploration of key issues of importance;
- (d) Use of mutually acceptable procedures for negotiation;
- (e) Willingness to change initial position and modify offers where possible; and
- (f) Provision of sufficient time for decision making. (page 15)

COMMENT: It is increasingly common to find among indigenous peoples self-established and determined protocols for consultation and for consent. Where these exist, they should be respected, explicitly referenced and used to determine appropriate consultation forms, schedules and requirements. This should be referenced both in the general ‘meaningful consultation’ section of the guidance, and in this section describing the requirements of ‘good faith consultation’.

48. Over and above the requirement for meaningful consultation for projects adversely affecting indigenous peoples, projects are required to facilitate a process of FPIC with the indigenous peoples with regard to project design, implementation and expected outcomes if these are associated with any of the following effects: (page 16)

COMMENT: FPIC should be sought for not only in case of adverse impact (Risk mitigation tool) but rather in case of any activity planned to take place in IP lands (principle of self-determination), and not only at initial stage of project development but throughout the project cycle, including project implementation

48 (c) Impacts on cultural heritage that is essential to the identity, cultural, ceremonial, or spiritual aspects of indigenous peoples lives, including natural areas with cultural or spiritual values such as sacred groves, sacred bodies of water and waterways, sacred trees, and sacred rocks; or (page 16)

COMMENT: FPIC to apply in case of impacts over land, territories and resources, for tangible and intangible impacts on cultural heritage, sacred spaces and on IP knowledge, skills and innovations

Any engagement processes should aim to ensure that the entire population of indigenous peoples is aware of and understands the risks and impacts associated with project development; (page 17)

COMMENT: IPs should be made aware of potential risks but also benefits associated with project development

50. In certain cases, it may not be possible to define all aspects of the activity and its locations, identify affected communities (including indigenous peoples) and review project environmental and social assessment and related mitigation plans before decisions are taken about project design aspects (e.g., programmatic approaches). In the absence of these elements, achieving FPIC prior to approving a project may not be feasible or considered meaningful because the determination should be closely related to the defined impacts of a known project on indigenous peoples. The appropriate sequencing of achieving FPIC is generally to first agree on key principles through an overall

framework, and then consult on specific aspects once designs are further advanced and locations are determined. Documents that are required to be submitted in the process of achieving FPIC should, in almost all cases, include a framework agreement on engagement and consultation and agreements demonstrating FPIC. The absence of such a framework agreement would need to be carefully justified. (page 17)

COMMENTS: Understanding that FPIC is both a process and an outcome, documents submitted regarding an FPIC process must include the framework agreement for the process element of this requirement. There may be limited cases in which this is not necessary, but these should be rare and justified on a case-by-case basis.

55. FPIC entails consent for specific activities, impacts and mitigation measures as anticipated at the time when consent is given. While the agreement should be valid for the duration of the project, for projects with an extended operational lifespan, it is good practice to monitor the Policy or similar action plans and be flexible in adapting them as needed if circumstances change, while maintaining the overall principles, commitments, and mutual accountabilities outlined in the agreement. (page 18)

COMMENT: It should be clarified that FPIC is a decision-making process in which indigenous peoples holds the authority to define and decide their plans, and to have a meaningful participation in development and or in a project. Free, Prior and Informed Consent (FPIC) is not a one-off process; instead it is an ongoing process of dialogue and decision making of indigenous peoples. It maintains a good faith cooperation between indigenous peoples and a Company to operate a project. The cooperation depends on the gradual fulfillment of commitments, with the understanding that it may be revoked if the commitments are not followed.

56. Achieving FPIC requires that the accredited entity address both process (i.e., good faith negotiations) and outcome (i.e., evidence of agreement). The accredited entity should document (i) the mutually accepted engagement and negotiation process between the accredited entity and indigenous peoples; and (ii) evidence of an agreement between the parties regarding the outcome of the negotiations. Impacts on vulnerable groups within the indigenous peoples should be adequately addressed during the negotiation and in the relevant documentation. (page 18)

COMMENT: In FPIC process AE should also document (iii) awareness raising and consultation plan, and (iv) the IPPs should be the basis of agreement. It should be accompanied by Implementation Framework Agreement. Only then, IPs may grant consent on the given conditions/ commitments to implement the IPP.

The possibility of unacceptable practices (including bribery, corruption, harassment, violence, retaliation and coercion) (page 18)

COMMENT: include threats, intimidation, criminalization. GCF should adopt a policy of zero tolerance against attacks to defenders as the IFC has done for instance. IFC policy states that it will “*not tolerate any action by IFC client that amounts to retaliation – including threats, intimidation, harassment or violence – against those who voice their opinion regarding the activities of the IFC or its clients*”.

(b) Environmental, social and cultural impact management (including land and resource management);

(page 19)

COMMENT: FPIC agreement documentation should also include awareness raising activities and consultation plan and processes, the IPP plan and clarify that agreement should be the outcome

54. *The FPIC process and outcome does not require unanimous support from all members of affected communities of indigenous peoples. (...) Further, FPIC should not be a process through which traditional and customary decision-making processes are undermined or excluded, and explicit inclusion of, and respect for the decisions of, such processes should be ensured. Page 17-18.*

COMMENT: In order for FPIC to strengthen and not undermine indigenous peoples' own autonomy and decision-making processes, it will be important for this section to reference and respect such decision-making processes. Where an authentic and self-recognised indigenous governance system exists with a mandate to speak on behalf for the affected people and communities, such authority should not be undermined. This does not change the responsibility to consult widely, but should explicitly be linked to, and supportive of, traditional decision-making processes, including but not restricted to where indigenous governance systems have outlined FPIC and consultation protocols.

Have the individuals identified as legitimate leaders of the indigenous communities involved been met and consulted? (page 21)

COMMENT: FPIC should not only engage individuals recognized as legitimate representatives of IPs but the community as a whole

61. *The agreement between parties should include requirements to develop time-bound and appropriately resourced implementation plans such as a community development plan or an IPP. Examples of agreements include a memorandum of understanding, a letter of intent, and a joint statement of principles. (page 22)*

COMMENT: resourcing for the delivery of an IPP and/or community development plan is critical, with independence in the financial resourcing built in where possible (i.e. funds held in escrow or separately from other project funds to minimise opportunities for state or other forms of corruption or the exercise of undue influence in the disbursement of funding.

69. *The following provides a brief and simple list of questions that accredited entities can use to assess FPIC for any project:*

- (a) Does the project staff have the knowledge and competence to work with indigenous peoples in a culturally appropriate manner?*
- (b) Has the project staff been trained on how to interact with indigenous peoples?*
- (c) Has a consultation and engagement strategy been developed, in agreement with the concerned indigenous peoples, and taking into account their own mechanisms, languages and locations?*
- (d) Have the individuals identified as legitimate leaders of the indigenous communities involved been met and consulted?*
- (e) biz. Where relevant, have consultation and/or FPIC protocols developed by the potentially impacted indigenous peoples been respected, and incorporated into the processes of meaningful consultation and FPIC?*
- (e) Have the involved communities had sufficient time to get independent expert advice on the project?*
- (f) Have sufficient resources been provided for the community to be effectively engaged (e.g., obtain independent expert advice on the project)?*
- (g) Have adequate mechanisms and procedures for effective participation in the FPIC process been established?*

COMMENT: Some edits needed to highlight FPIC/consultation protocols and their potential importance for defining these processes where relevant, and appropriate resourcing and independence for external advice

71. *The priority objective of the assessment process is to identify measures to avoid adverse impacts on these lands, waters, resources, and indigenous peoples use. (page 22)*

COMMENT: Assessment process should be related also to impacts on territories and resource of IPs while its objective should also include the promotion, support and safeguarding of IP direct contribution

(f) Facilitating partnerships among the government, indigenous peoples organizations, CSOs, and the private sector to promote indigenous peoples' development programs. (page 26)

COMMENT: When facilitating partnerships with CSOs , governments and IPs, opportunities should be provided to offer direct access to funding to IPs

The Readiness and Preparatory Support Programme provides a good opportunity to ensure that the indigenous peoples issues and the role is fully acknowledged and realized. It is important that through Readiness support developing countries better understand and describe indigenous peoples specific risks and opportunities, and the potential to maximize the development impact of GCF programming for indigenous peoples in line with the Policy. (page 27)

COMMENT: The whole list contained in earlier drafts and related to Readiness-related activities NDAs should do to mainstream and implement IP policy should be reinserted