



**For Indigenous peoples,
for nature,
for all humanity**

Grievous Biodiversity Failure Fund:

How the new GBF Fund is failing to protect Indigenous people or to uphold the Global Biodiversity Framework

Updated 19th February 2025

Main points made in the briefing

- Survival International has analysed the documentation for all forty of the so-far approved Global Biodiversity Framework Fund (GBFF) projects and project concepts. We find overall that the current and immediate future program is grievously lacking in alignment with both the Fund's mandate to "support the human rights-based implementation" of the Kunming-Montreal Global Biodiversity Framework (KMGBF), and its "aspiration" that twenty percent of disbursements would go to Indigenous people and local communities (IPLCs).
- The funding mechanism for the GBFF – through the Global Environment Facility – is in itself highly problematic. First, the Fund lumps together Indigenous people with other 'local communities'. This reflects a similar conflation found in the KMGBF, but it does not reflect the very specific status of Indigenous people as set out in various international agreements. Second, in violation of multiple international laws and standards, the GEF does not apply a specific safeguard to ensure respect of the right to Free Prior and Informed consent to Indigenous People. Evidence of proper consideration of FPIC has been lacking in all the full projects so far approved. Technical assessment by the GBFF of proposed projects seems to involve no expertise in Indigenous or local community rights, tenure or livelihoods.
- In practice, the GBFF's project portfolio so far is dominated by UN agencies and a select handful of mostly US-based conservation organisations. Rather than representing any transformative solution to the biodiversity crisis, the GBFF so far seems mostly to represent a reinforcement of old and failing models of top-down, colonial conservation, especially through the establishment of National Parks and other reserves.
- Only one of the forty projects so far approved – the very first proposed, by the government of Brazil – will likely be of benefit to Indigenous people and is clearly directed to them. Following a project application template, all the projects make a 'tick-box' claim to have an allocation to IPLCs. If true, these would total more than thirty percent of the \$201 million for approved projects and concepts (and project

preparation grants) to date. But our analysis reveals that only one of the other thirty-nine programmes contains any *budgetary provision* for work with Indigenous people.

- In terms of funding, the one project involving Indigenous lands in Brazil represents about 4% (\$8 million) of the total so far approved or provisionally committed by the GBFF. This is less than the ‘proposer agency’ fees being paid to mostly UN agencies and international conservation organisations such as WWF simply for submitting proposals. Together, these fees alone come to more than 8% (\$17 million) of the total funds currently committed.
- The *total* fees to be paid to the proposer agencies - that is, above and beyond actual project activity costs, thus including project preparation grants, proposer fees, project management costs, ‘communications and knowledge management’ and ‘monitoring and evaluation’ costs - comes to 25% of the total funds available. The proportion of project funds staying within these agencies will likely be much higher still, taking into account staff costs etc.
- Of the proposing (and implementing) agencies, United Nations Development Programme (UNDP) has been the most successful in capturing funds. Its fourteen approved projects or concepts (including preparation grants) account for \$47 million, nearly a quarter of the total funding¹. The next most successful, the US chapter of WWF (WWF) and the UN Food and Agriculture Organisation (six and eight projects respectively) account for twenty percent and twelve percent of the total funds each. Together with US organisation Conservation International, these agencies will receive \$138 million, or more than two-thirds of total funding so far committed.
- One of the projects will fund (through WWF) Protected Areas in Africa which have long histories of dispossession of Indigenous people from their lands, and brutality against them by eco-guards. Others are likely to affect Indigenous lands and should be closely monitored to ensure they are only conducted with the Free Prior and Informed consent of Indigenous people.

1. Background to the GBFF

The question of how to finance the implementation of the Kunming-Montreal Global Biodiversity Framework was a key and controversial issue at the CBD COP in 2022 where the Framework was adopted after several years of discussion and negotiation. Many mostly Global South countries (where most biodiversity is found) argued for a new dedicated global fund to be set up, which could receive payments from rich country governments, or from companies, such as for the use of biological (especially genetic) resources found in the Global South. This was firmly rejected by most Northern countries. Instead, a new fund was set up under the Global Environment Facility (a collaboration between the World Bank, various UN agencies, and governments), called the Global Biodiversity Framework Fund

¹ UNDP and the World Bank have also had a joint project concept approved, the financing for which is included in the totals stated here.

(GBFF). The aim of the Fund is “to help countries achieve the Kunming-Montreal Global Biodiversity Framework goals and targets”.²

As of February 2025, around \$383 million had been committed to the fund, mostly from the governments of Canada (\$146m), Germany (\$98m), the UK (\$69m), Denmark (\$14.5m), Norway (\$14m) and New Zealand (\$12m)^{3,4}. This was vastly less than the kinds of figures stated by conservationists as required to halt biodiversity loss⁵. The overall objectives of the Fund state that it is “expected to support the human rights-based” implementation of the KMGBF⁶. In 2023, the GEF also set an “aspirational target” that 20 percent of GBFF disbursements would go to Indigenous People and Local Communities (IPLCs)⁷. Arguably, this was already an inadequate amount, given that Indigenous people alone occupy most of the world’s most biodiverse places.

2. The Global Environment Facility’s totally inadequate Indigenous safeguard policies

The choice of the Global Environment Facility to run the GBFF was already deeply unacceptable in terms of Indigenous rights. Crucially, the organisation does not universally require that Indigenous people have the right to Free Prior and Informed Consent (FPIC) over any projects it funds which may affect their lives, lands and rights. Such requirement for consent is only covered by the GEF’s ‘Principles and Guidelines for Engagement with Indigenous Peoples’ where the recipient country has ratified ILO Convention 169⁸. This is only the case for 24 countries worldwide (six of which are in Europe). Even then, the GEF stipulates that for its purposes, FPIC can be demonstrated through “(i) *the mutually accepted **consultation** process between the project proponent and affected indigenous communities and (ii) evidence of **agreement between the parties as the outcome of the consultations***”⁹ (emphasis added).

In other words, in most countries where GEF might fund projects through the GBFF, FPIC would not be required. Even in the few where it applies, the critical concept of *consent* (i.e., Indigenous people having the *right to decline* a project that affects them), is downgraded merely to project proponents having to demonstrate that *consultation* has been carried out.

3. How the Fund works

The Fund and its financial backers have stressed that it will be used to promote biodiversity protection in developing countries¹⁰. However, as with all GEF projects, proposals can only be submitted by one of the designated ‘GEF Agencies’. This is a group of 18 institutions comprised mostly of multilateral development banks such as the World Bank, UN agencies such as UNDP, the two conservation corporations WWF-US and Conservation International

² GEF, undated. Global Biodiversity Framework Fund. <https://bit.ly/3Y9t7Fz>

³ World Bank Group, Global Biodiversity Framework Fund (GBFF) <https://bit.ly/4drK2r8>

⁴ GEF, 2024. Joint statement on donors’ pledge of \$163 million and confirmation of support to the Global Biodiversity Framework Fun. <https://bit.ly/433lzqO>

⁵ See for example, TNC, 2020. Closing the Nature Funding Gap: A Finance Plan for the Planet. <https://bit.ly/47XtXbK>

⁶ GEF, 2023a Council Meeting June 2023. Establishment of a new Trust Fund: Global Biodiversity Framework Fund <https://bit.ly/47EPJRp>

⁷ GEF, 2023b. Programming Directions for the Global Biodiversity Framework Fund <https://bit.ly/3Bh0r11>

⁸ GEF, 2012. Principles and Guidelines for Engagement with Indigenous Peoples. <https://bit.ly/47OG4Yy>

⁹ GEF, 2012, *op cit*.

¹⁰ See for example, GEF, 2023c. New global biodiversity fund launched in Vancouver. <https://bit.ly/3TVivaO>

(both of which have long histories of complicity in human rights violations against Indigenous people), plus the International Union for Conservation of Nature (IUCN)¹¹. Applications are supposed to be prepared “at the request of and in consultation with relevant country institutions and other relevant partners”¹². Applications are also required to be ‘endorsed’ by the government of whichever country the project will take place in. But of course, as developing country governments and other potential applicants such as Indigenous people have been locked out of making applications themselves, the privileged GEF Agencies are in a uniquely powerful position to determine what is proposed and what not.

A ‘simplified’ application process is then followed where applicant agencies request funding to prepare a project application (ie. for a Project Preparation Grant, PPG). (These can be significant grants in their own right: WWF and CI each received \$327,000 dollars, including their ‘Agency Fees’, just to prepare a project). The remainder of the project application process is essentially contingent on the selection of PPGs – which is carried out entirely by the GEF Secretariat. Subsequent full project documents can later be challenged by the GEF Council (which comprises representatives of 14 developing country governments and 16 from developed countries) but only the projects originally selected (and subsequently approved by the CEO of the GEF) will ever reach this far. Hence the GBFF application and decision-making process is heavily centralized, and almost entirely in the hands of the GEF Agencies and GEF staff.

4. What is being funded?

As of the end of September 2024, four full projects had been approved, and 18 concepts. The GEF Agencies submitting these projects were as shown in Table 1:

Table 1: Allocation of the first 40 projects and approved concepts, by agency and breakdown of funding

| Agency | Number of projects | Project grants total (\$) | Preparation grants, agency fees & project mngmnt costs (\$) | TOTALS (\$) | % of total funding | Amount in project grants for comms and M&E (\$) |
|---------------|--------------------|---------------------------|---|--------------------|--------------------|---|
| UNDP | 14.5 | 39,474,925 | 7,733,642 | 47,208,566 | 23.1 | 3,889,805 |
| WWF-US | 6 | 36,203,632 | 5,959,551 | 42,163,183 | 20.6 | 4,629,359 |
| FAO | 8 | 21,585,910 | 4,251,997 | 25,837,907 | 12.6 | 4,899,662 |
| CI | 2 | 19,996,074 | 3,379,932 | 23,376,006 | 11.4 | 1,344,680 |
| CAF | 2 | 16,853,770 | 2,920,369 | 19,774,139 | 9.7 | 1,360,858 |
| IUCN | 2 | 10,878,550 | 1,953,450 | 12,832,000 | 6.3 | 645,881 |
| World Bank | 1.5 | 9,284,931 | 1,521,820 | 10,806,750 | 5.3 | 425,465 |
| Others | 4 | 19,484,543 | 3,132,936 | 22,617,479 | 11.1 | 100,000 |
| TOTALS | 40 | 173,762,334 | 30,853,696 | 204,616,030 | 100 | 17,295,710 |

As this shows, the three largest recipients are UNDP, WWF (though its US branch), and FAO. The first two have been associated with the establishment or management of protected areas involving serious abuses of Indigenous rights, territories or livelihoods¹³. Together with CI, they account for more than two-thirds of the funding approved so far.

¹¹ GEF, undated. GEF Agencies. <https://bit.ly/4erJcMv>

¹² GEF, 2024a. Global Biodiversity Framework Fund (GBFF) Project Cycle Policy. <https://bit.ly/4eN2bkh>

¹³ See for example, House Natural Resources Committee, hearing on Protecting Human Rights in International Conservation <https://bit.ly/3Bktdv8>

The various fees alone (i.e, above and beyond project activity costs) being paid to rich-country Agencies are more than the *total* grants being made towards projects of benefit to IPLCs, as indeed are the additional amounts being paid for items such as ‘communications’, ‘knowledge management’ and ‘monitoring and evaluation’. Taken together, Agency, management fees, and these latter ‘quasi-project costs’ come to a quarter of the total funding so far approved.

The types of projects being funded are also revealing. The GEF has divided the GBFF’s expenditure into eight ‘Action Areas’. Together these supposedly cover most of the 22 specific targets from the KMGBF, though some are missing. Among the KMGBF targets *not* covered by the GBFF is Target 21, which refers to the need to ensure that “*traditional knowledge, innovations, practices and technologies of indigenous peoples and local communities should only be accessed with their free, prior and informed consent*”. The distribution of funds by ‘Action Area’ is shown in Table 2.

Notable from Table 2 is that nearly half the funding is going towards KMGBF Targets 1-3, which concern the increase in spatial planning and ecosystem restoration, and the ‘30x30’ target to increase the extent of Protected Areas to 30 percent of the Earth’s land and seas by 2030. This latter target is of particular concern to Survival International because National Parks, wildlife reserves and other conservation areas are already one of the biggest threats to Indigenous peoples’ lands, rights and livelihoods. Such parks have almost always involved brutal evictions and exclusions, violence and destruction of Indigenous cultures. Such problems continue today, such as the horrifying eviction of thousands of Maasai people from the Ngorongoro Conservation Area in Tanzania. The near-doubling of the global extent of Protected Areas under the KMGBF Target 3 will undoubtedly intensify such atrocities against Indigenous people.

Table 2. GEF-GBFF funding by 'Action area' (USD, excludes project preparation grants)

| Action area | \$ | % of total |
|---|--------------------|--------------|
| 1. Biodiversity conservation, restoration, land/sea-use and spatial planning (KMGBF Targets 1, 2, and 3) | 86,389,061 | 45.8 |
| 2. Support to IPLC stewardship and governance of lands, territories, and waters (Targets 1,2, 3, and 22) | 52,654,432 | 27.9 |
| 3. Policy alignment and development (Targets 14, 15, 18) | 6,564,667 | 3.5 |
| 4. Resource mobilization (Targets 18 and 19) | 16,963,893 | 9.0 |
| 5. Sustainable use of biodiversity (Targets 5 and 9) | 7,122,468 | 3.8 |
| 6. Biodiversity mainstreaming in production sectors (Targets 7 and 10) | 14,482,237 | 7.7 |
| 7. Invasive alien species management and control (Targets 6). | 1,607,048 | 0.9 |
| 8. Capacity building and implementation support for biosafety, handling of biotechnology and access and benefit sharing (Targets 13 and 17) | 3,025,818 | 1.6 |
| | | |
| TOTAL | 188,809,624 | 100.0 |

Also seen from Table 2 is that more than a quarter of funding is supposedly going towards “Support to IPLC stewardship and governance of lands, territories, and waters”. The GEF-GBFF concept note application form requires entry of a figure for “Amount of resource allocated to support actions by IPLCs for the conservation, restoration, sustainable use and management of biodiversity”. This of course is a very broad heading which can include a multitude of proposed actions and spending which may or may not actually involve Indigenous people and local communities (IPLCs). If true, the figures entered for this would be even higher, at around thirty percent of the \$204 million for approved projects and concepts (and project preparation grants) to date. However, Survival has scrutinized the actual budgets of the approved projects and concepts and found that these figures appear to seriously misrepresent how much is really directed towards Indigenous people or local communities.

Only one of the forty projects so far approved – the very first proposed, by the government of Brazil – will likely be of benefit to Indigenous people and is clearly directed towards them. This project accounts for about 4% of the total allocated so far by the GBFF. It relates to “Biodiversity Conservation in Indigenous Lands”, principally through the mechanism of Territorial and Environmental Management Plans (PGTAs)¹⁴. However, a study of this mechanism has found that, of the resources invested to strengthen Indigenous peoples and traditional and local communities, only 17% is invested directly in organizations and networks led by Indigenous peoples or in projects that directly mention these organizations¹⁵.

Our analysis reveals that *only one* of the other 39 programmes contains any actual *budgetary provision* for work with Indigenous people, and even this is not totally clear. Only fourteen have provision for work with other local communities, and in only nine does this allocation represent more than a quarter of the overall project budget. Many proposals include clearly contrived project elements which purportedly involve IPLCs. Some of these are, at best, questionable, and in others seemingly fictitious. Because of the vagaries of the budgets, it is not possible to say exactly how much funding overall will be for the benefit of IPLCs, but it is certainly a long way short of 20 percent, per the GEF’s aspirational target.

On the basis of the evidence so far, the GBFF will do nothing to redress the well-documented imbalance of funding for biodiversity measures, wherein only a very small percentage is channeled through and to Indigenous or other local communities.¹⁶ Countries pledging to address this in 2021 included two of the key financial backers of the GBFF, the governments of Germany and the UK.¹⁷

Three Action Areas – #1, #2 and #4 - account for more than four-fifths of all the intended funding to all the 40 so-far approved concept notes and projects. In other words, the proposals submitted, by the proposers’ own descriptions, are mostly about planning, Protected Areas and generating still further conservation funding. Potentially transformational measures such as investment in new national policies to protect

¹⁴ GEF, 2024b, Biodiversity Conservation in Indigenous Lands, GEF-8 PPG REQUEST FOR GBFF PROJECTS, bit.ly/4dE2bC2

¹⁵ INESC and Rainforest Foundation Norway, 2023, Ampliar para preservar; Análise dos PGTA na retomada da Política Nacional de Gestão Ambiental e Territorial de Terras Indígenas no Brasil, <https://bit.ly/3YeqXLq>

¹⁶ See for example, Rainforest Foundations US, Norway and UK, 2022, Realising the Pledge: How Increased Funding for Forest Communities Can Transform Global Climate and Biodiversity Efforts. <https://bit.ly/3BACFjU>

¹⁷ UNFCCC, 2021. COP 26 IPLC Forest Tenure Joint Donor Statement, <https://bit.ly/3YfOQM5>

biodiversity, and ‘mainstreaming of biodiversity’ into existing government policies (Action Areas #3 and #6) come a very long way behind, with around 11% of funding between them.

Case study 1: ‘Strengthening transboundary conserved area management of the Sangha Tri-National (TNS)’ GBFF Project ID 11609, proposed by WWF-US

This project is at the stage of being an approved concept, and WWF-US has received nearly \$218,000 for preparing a full project application. The total cost of the project to the GBFF is \$7 million, of which about 11% is pure Agency Fees for WWF (for submitting the proposal which the GBFF has already paid for) and monitoring costs¹⁸.

The ‘Tri-National Sangha’ area consists of three adjacent strictly protected National Parks covering some 28,000 square kilometres: Nouabale-Ndoki in the Republic of Congo, Lobeke in Cameroon and Dzanga-Ndoki in the Central African Republic. At least two of the three have a history of dispossession and eviction of Indigenous people; human rights abuses inflicted on them by ‘eco-guards’ have been recorded in and around the parks in recent years.¹⁹

Most of the money (\$5.3 million) remaining after WWF’s share will go straight into an Endowment Fund (the ‘Sangha Tri-National Trust Fund’, FTNS), with another \$600,00 being used ‘enhance the capacity and procedures’ of the Fund. The FTNS is a highly opaque and unaccountable funding vehicle first established in 2007 and later registered as a charity in the UK. It has received multiple large endowments, including from the World Bank and German government, which are invested to generate a continual flow of funds which are then distributed to the three national parks. This structure means that it is able to circumvent any donor restrictions or safeguards (such as on respect of Indigenous rights, or purchase of weapons) because technically all the funds are unrestricted and not obtained directly from funding agencies. Its most recent annual accounts, for 2022, show that it already held reserves of EUR 64 million (about \$70.5 million at current exchange rates)²⁰. Its links with the human rights abuses occurring in the national parks which it serves to fund have been highlighted in the international media.²¹

In short, the GBFF will, through this project, be funding Protected Areas which have a known history of eviction of and conflict with Indigenous people and other local communities, through a mechanism which obscures exactly how the funding is being used, and which is already possessed of much larger funds.

5. More GBFF failures...

On top of these over-arching concerns about who and what is being funded through the GBFF, we have identified other systemic problems, including:

¹⁸ GEF, 2024c Strengthening transboundary conserved area management of the Sangha Tri-National (TNS) GEF-8 PPG REQUEST FOR GBFF PROJECTS. <https://bit.ly/3Bp4bkf>

¹⁹ See for example; Ayari I and Counsell, S, 2017. The Human Cost of Conservation in the Republic of Congo; Conkouati-Douli and Nouabale-Ndoki National Parks and their Impacts on the Rights and Livelihoods of Forest Communities, Rainforest Foundation UK <https://bit.ly/3XOB9IP>; Survival International, 2017. How will we Survive? <https://bit.ly/3YaF9ys>

²⁰ FTNS, 2023. Report and Financial Statements for the Year Ended 31 December 2022. <https://bit.ly/4gJYy0e>

²¹ McVeigh, K, 2019. UK charity knew of alleged abuse in Congo parks but did not act. The Guardian <https://bit.ly/2F3al8Z>

5.1 Transparency

At a basic level, the GBFF is fairly transparent. The project proposals, assessments by the GEF Secretariat and Technical Experts are all publicly available and easily located on the GEF project database²². On the other hand, none of the key project documents concerning respect of the relevant GEF safeguards, such as those concerning Indigenous people, are available. Figure 1 shows the list of such documents forming part of one of the approved full project applications.

Figure 1. Safeguard documents forming part of the project application ‘Mex30x30: Conserving Mexican biodiversity through communities and their protected areas’: none of these are publicly available²³

| Title |
|--|
| 20240423 CI-GEF GENDER MAINSTREAMING PLAN (GMP) |
| 20240423 Accountability & Grievance Mechanism (AGM) |
| 20240423 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) |
| 20240423 Community Health Safety and Security Plan (CHSSP) |
| 20240423 STAKEHOLDER ENGAGEMENT PLAN (SEP) |
| 20240423 Indigenous Peoples Plan IPP |
| 20240423 ESS Preliminary Screening Form |
| 20240423 CI GEF ESS Screening Report Mex30x30 |

In other words, it is impossible from the documentation made publicly available by GBFF to know how or if the relevant safeguards have been complied with. This is the case with all four of the full projects which have been approved, all of which potentially affect Indigenous people.

5.2 Lack of application of GEF FPIC safeguards

In addition to the above, three of the four approved full projects (as opposed to those which are approved concepts) are in countries which have ratified ILO 169 (Mexico and Brazil) and hence should comply with the GEF’s requirement to demonstrate respect of Free Prior and Informed Consent. Only one of the project documents attempts to describe how FPIC could have been taken into account in the project’s development. However, there is nothing in any of this project’s available documentation (such as the Technical Review) assessing whether this is really the case or which requires proper documentation of the FPIC process.

Two other of the four projects have been approved on the basis that the specific areas which they will eventually protect have yet to be identified. Hence, the proponents defer any future FPIC processes to when these areas have been determined. It is not clear what steps would or could be taken by the GBFF to ensure that proper and GEF-compliant FPIC has been sought when a project is already well underway and possibly much of the funding already disbursed. In the case of the fourth fully approved project, even though it claims to be “Conserving biodiversity through communities and their protected areas” in an ILO 169-

²² See <https://bit.ly/4gOtSLm>

²³ GEF, 2024d. “Mex30x30: Conserving Mexican biodiversity through communities and their protected areas”. GEF-8 Request for CEO Endorsement/Approval. <https://bit.ly/3XPEnW3>

ratified country (Mexico) with a very high Indigenous population, there is no reference whatsoever to FPIC in any of the project documentation.

In other words, combined with the lack of transparency on application of the full range of GEF safeguards, there is no evidence at all that FPIC, even to the limited extent required under the GBFF itself is being properly upheld.

5.3 Inadequate technical checks

Initial technical checks on Project Preparation Grant applications are carried out by the GEF Secretariat. The reports of these checks are available publicly, and they tend to indicate that fairly cursory examination is made of these early, but important, 'pre-applications'.

A further concern is over the technical assessment on the subsequent full project proposal. This is conducted by one of the members of the GEF Scientific and Technical Advisory Panel. All appraisals of the four full proposals so far approved (including that for the Brazilian Indigenous lands project) have been done by John Donaldson, who is a conservation biologist and between 2010-2020 was Chair of an IUCN Conservation Committee²⁴. There has been no scrutiny from, for example, expertise in Indigenous tenure or rights, or on such issues related to local communities. Indeed, none of the ten members of GEF Scientific and Technical Advisory Panel has such expertise. It does not appear that compliance with safeguards has fallen within the remit of the Technical Reviews; in the case of FPIC, the lack of clear demonstration of this in any of the four approved projects has not caused any comment from the Technical Advisor.

Case study 2: 'Mex30x30: Conserving Mexican biodiversity through communities and their protected areas', GBFF Project ID 11510, proposed by Conservation International

This is a fully approved project, which aims to put some 3.6 million hectares of terrestrial Protected Areas under "improved management effectiveness", along 22 million hectares of marine Protected Areas. CI received \$327,000 to develop the proposal. The total project cost is a little over \$18 million, of which CI will receive \$3.1 million in agency fees, project management costs, and communication and monitoring costs²⁵.

Whilst the project title suggests that it will all involve "communities and their protected areas", the content of the proposal suggests that only a limited portion of the project will involve actual community Protected Areas. The project includes activities targeted at community 'Areas Voluntarily Destined for Conservation' (ADVCs) but it is not possible to disaggregate these from the general component concerning the strengthening of Protected Areas. However, the ADVC areas concerned (in the Chimalapas region) constitute less than 9% of the total Protected Areas to be funded under this component. Therefore it can be assumed that it is a commensurately small funding element. Of the more detailed budget available for the project, only a few hundred thousand dollars' expenditure is clearly related to the ADVCs. Twelve million of the total \$18 million comprises 'endowment funds' for the 5 Protected Areas and the cluster of ADVCs, and again the proportion of this targeted at the ADVCs is not disaggregated. Hence the total amount targeted to supporting IPLCs could be

²⁴ GEF, undated b. Scientific and Technical Advisory Panel, John Donaldson, Panel Member on Biodiversity. <https://bit.ly/3N6W66z>

²⁵ GEF, 2024d, loc cit.

very limited, and certainly much less than the original \$12 million which the project concept claimed.

The project document states that there will be a call for proposals to CBOs/NGOs/IP orgs to implement some elements of the programme, though with no funding figures attached, and this of course might not result in any resources actually flowing to Indigenous peoples or local communities.

As noted earlier, the project documentation contained no mentions at all of any Free Prior and Informed Consent processes having been carried out, and this was not raised in any of the technical assessments.

6. Conclusions

The data from the so-far approved projects and concept notes points to a heavy bias towards projects concerning the establishment or strengthening of Protected Areas. Although the Indigenous and human rights problems associated with both this type of project and the specific organisations running them are well documented, there has been almost no attention given to ensuring that these do not recur in the new GBFF-funded projects. In this sense, the GBFF does not appear to be operating consistent with the 'safeguard' wording of some parts of the KMGBF (such as in Target 3). Its own safeguards concerning Indigenous people are weak, and are even then apparently not being properly upheld.

There appears to be a great deal of, at best questionable, and at worst plainly false, information being perpetuated about how much of the GBFF will actually reach or be of benefit to Indigenous people or local communities. The aspirational target of 20% going to IPLCS is certainly not being achieved in the first 40 approved projects and concepts. Meanwhile, the eligibility, agency fee and proposal preparation grant structures facilitate the capture of the mechanism by large institutions and conservation corporations with long histories of complicity in human rights violations, as well as incentivizing large scale top-down proposals and projects, rather than smaller-scale efforts likely of benefit to communities.

The support apparently already committed to projects such as that concerning the Tri-National Sangha suggest that the screening mechanisms for proposals to the GBFF are utterly negligent.

Rather than being a transformational initiative which could achieve the aim of supporting "human rights-based implementation" of the Kunming-Montreal Global Biodiversity Framework, it is so far simply repeating and entrenching previous patterns of resource use in biodiversity protection –particularly in terms of promoting top-down, government and international agency-driven colonial and racist programmes for planning and Protected Areas.
