

Submission to the GCF 3rd Updated Strategic Plan for 2028-2031

22 May 2026

A submission by the following organisations:

International Work Group for Indigenous Affairs (IWGIA)

Nepal Federation of Indigenous Nationalities (NEFIN)

Pastoralist Indigenous NGOs Forum (PINGO's Forum)

Inter Mountain Peoples Education and Culture in Thailand Association (IMPECT)

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This submission reflects the advocacy and views of the submitting organisations and their networks engaged in the Green Climate Fund, also documented in dedicated annual articles of The Indigenous World ([IWGIA 2026](#)). The submission also draws substantially on the [Independent Evaluation of the Green Climate Fund's Approach to Indigenous Peoples](#) and its accompanying Annexes, with relevant in-text references. We address all eleven questions of the invitation, providing recommendations in each of them.

1. Please share experience and feedback on the design and implementation of the GCF's 2nd Updated Strategic Plan (2024-2027), including its focus areas and targets.

The USP-2, while referencing Indigenous Peoples as "agents of change" and committing to "integrating" Indigenous Peoples' knowledge, establishes commitments that remain largely aspirational and lack measurable targets, dedicated financing, or accountability mechanisms.

The IEU's Independent Evaluation of the GCF's Approach to Indigenous Peoples (2025) confirms this gap: the GCF's approach under USP-2 has been primarily compliance-driven and "do-no-harm" oriented, with no portfolio-level indicators tracking IPs-related outcomes, no disaggregated data on Indigenous beneficiaries, and no specific financing window for Indigenous Peoples (Finding 14; Finding 7). Accredited Entities (AEs) frequently experience the Indigenous Peoples Policy and related safeguards as a "tick-box" compliance exercise, duplicative with Environmental and Social Safeguards requirements and disproportionately burdensome in documentation rather than implementation. This dynamic risks reducing Indigenous Peoples' rights to procedural compliance rather than substantive participation, consent and governance.

Key concerns from implementation experience include:

- **Recognition without operationalisation:** Indigenous Peoples are recognised in the Paris Agreement, the IPCC AR6, and the GCF Governing Instrument (para. 71), yet the USP-2 makes only modest commitments to access or benefit-sharing for Indigenous Peoples.
- **Safeguards not fully implemented:** FPIC documentation is incomplete in the majority of relevant projects (only 16 of 35 projects submitted complete FPIC documentation), too frequently operationalised as enhanced consultation rather than as a genuine self-determined consent process and often treated as one-off procedural steps occurring after project design rather than as iterative processes linked to key decision-making stages throughout the project cycle, including the possibility of refusal, redesign or withdrawal of consent. Indigenous Peoples Plans (IPP) or Indigenous Peoples Planning Frameworks (IPPF) are often generic outlines (Annex 7).
- **No disaggregated data:** The precise number of Indigenous beneficiaries cannot be determined, nor can finance directed to them be estimated (Finding 8). This makes

accountability impossible. Beyond the absence of disaggregated beneficiary data, the GCF also lacks systematic portfolio-level monitoring of Indigenous Peoples-related outcomes. Only a very limited proportion of Indigenous-relevant projects include Indigenous-specific indicators, Indigenous Peoples are rarely integrated into theories of change, and co-benefits for Indigenous Peoples are neither consistently identified nor monitored across the portfolio.

- **Direct access remains structurally blocked:** The NDA-centred, accreditation-based model systematically excludes Indigenous Peoples and Indigenous Peoples' Organisations (IPOs) from accessing GCF resources directly (Finding 6). The current institutional incentives further reinforce exclusion. Because programming involving Indigenous Peoples often entails heightened procedural scrutiny without corresponding strategic prioritisation, financial incentives or operational support, AEs may be discouraged from engaging in projects involving Indigenous Peoples or may minimise the visibility of Indigenous-related components – particularly under simplified approval modalities and private sector operations
- **Readiness support underutilised:** Only 20% of relevant readiness grants partially, or not, supported Indigenous-related activities (Finding 12).
- **Lack of support for Indigenous-led solutions:** The GCF has no mechanism to finance Indigenous-led initiatives in Indigenous territories.

Recommendations:

1. **Target setting:** Increase ambition and include measurable targets for Indigenous Peoples' engagement and benefit-sharing, recognising the differentiated realities, priorities and governance systems of Indigenous Peoples across regions and contexts.
2. **Direct access:** Prioritise Indigenous-led initiatives. Provide direct access pathways for Indigenous Peoples, including through dedicated windows or programmes. Simplify the funding application procedures for Indigenous peoples.
3. **FPIC and safeguards:** Concretise the implementation of FPIC and strengthen the monitoring of safeguards. A group of Indigenous Peoples organisations in Peru have concretely proposed set stages for FPIC procedures throughout the entire project cycle ([IWGIA 2022c](#)).
4. **Disaggregated data:** Mandate the collection of Indigenous-disaggregated data across the portfolio.
5. **Engagement in readiness activities:** Ensure Indigenous Peoples' meaningful engagement in readiness activities.

2. Which global, regional and national trends and evolving country needs and priorities should the GCF take into account in the development of its Updated Strategic Plan? How can it better adopt to and align with those trends to ensure country ownership and enhanced direct access to climate finance for developing countries?

Several critical global trends must inform USP-3:

- **Normative evolution:** The international recognition of the role of Indigenous Peoples in climate policy has advanced significantly since the GCF adopted its Indigenous Peoples Policy in 2018. UNFCCC COPs 29 and 30 recognised Indigenous Peoples' contributions, the Kunming-Montreal Global Biodiversity Framework places Indigenous Peoples at the centre of biodiversity action, and the Facilitative Working Group of the Local Communities and Indigenous Peoples Platform (LCIPP) continues to generate guidance that the GCF is yet to fully incorporate.
- **IPCC AR6 confirms that Indigenous Peoples'** knowledge systems and land stewardship deliver cost-effective mitigation and adaptation outcomes – deforestation rates in Indigenous territories are up to 50 times lower than in unregulated lands ([IWGIA 2022a, 2022b](#)).
- **NDCs and NAPs exclude Indigenous Peoples:** Less than half of NDCs in countries with GCF Indigenous-relevant projects mention Indigenous Peoples.¹ Country ownership, as currently operationalised through National Designated Authorities (NDA), does not reflect Indigenous Peoples' priorities. In many countries, Indigenous Peoples remain partially recognised, or entirely unrecognised, under national legal frameworks. USP-3 should therefore reaffirm self-identification, consistent with the GCF Indigenous Peoples Policy and international human rights standards, as a sufficient basis for application of the Indigenous Peoples Policy independent of formal state recognition.

Recommendations:

1. **Redefine country ownership to include Indigenous Peoples' ownership**, not only NDA or government ownership. Enhanced direct access must extend beyond NDAs to Indigenous Peoples. The processes should be inclusive and a holistic based approach.
2. **Rights-based approach:** USP-3 must be guided by environmental, social and cultural integrity. Climate action that produces harms and violates rights – including dispossession, cultural erosion, exclusion from decision-making or forced relocation in the name of mitigation or adaptation – contradicts both the Governing Instrument and evolving COP guidance. Without a genuinely rights-based approach, climate finance interventions risk generating long-term social and ecological reversals, undermining sustainability and legitimacy.

¹ A mapping of NDCs and their recognition of Indigenous Peoples: [IWGIA 2025](#).

3. **Indigenous-led climate action is key to sustainability and scale:** Evidence consistently shows that when Indigenous Peoples and IPOs are meaningfully integrated into climate activities, outcomes are highly positive.
4. **Align with UNFCCC COP guidance:** USP-3 must reflect UNFCCC COP guidance on promoting Indigenous Peoples' knowledge and working with Indigenous Peoples.
5. **Flexible and innovative frameworks:** Build on the Readiness and Preparatory Support Programme (RPSP), Project Preparation Facility (PPF), Project-specific assessment approach (PSAA), Requests for Proposals (RfP), and dedicated windows to strengthen Indigenous Peoples' access. Avoid frameworks that concentrate resources in intermediaries with misaligned interests.
6. **Give priority to Indigenous Peoples' needs:** Country needs and priorities must include Indigenous perspectives, not be limited to NDA or government perspectives.

3. What should be the primary programming priorities and focus areas for the GCF in its next programming period to maximize its climate impact?

Meaningful partnerships with Indigenous Peoples contribute towards the climate objectives and maximising impact.

Recommendations:

1. **Locally led adaptation:** Financing must reach Indigenous communities directly, not only through international intermediaries. The IEU evaluation found that only 9.3% of IPs-relevant projects involved IPs in co-creation of funding proposals.
2. **Indigenous-led initiatives:** Indigenous Peoples' stewardship, grounded in traditional ecological knowledge, delivers superior conservation outcomes. GCF programming should actively seek and finance Indigenous-led approaches. This should include systematic engagement of Indigenous Knowledge Systems, customary governance institutions and territorial stewardship approaches into adaptation planning and mitigation strategies. Indigenous knowledge should be treated as a central, legitimate source of climate expertise and long-term sustainability.
3. **Reaching Indigenous Peoples directly:** The GCF's country-driven model has failed to reach Indigenous Peoples on the ground. A more proactive approach, including Requests for Proposals targeting Indigenous Peoples, is needed. The new GCF regional offices should be given mandates to closely working directly and support to Indigenous Peoples on the ground
4. **Diverse, innovative and distinct approaches to climate action:** Both direct (e.g., Indigenous-led conservation territories) and indirect (e.g., promotion of Indigenous governance, worldviews and knowledge systems) approaches to climate action must be financed. The Project Preparation Facility should be utilised to explore these approaches beyond conventional "bankable" project logic (Finding 11). This includes approaches that strengthen Indigenous governance systems, cultural continuity, territorial

stewardship and relationships with nature as integral dimensions of long-term climate resilience.

5. **Forestry and land use:** 36% of Indigenous-relevant projects already focus on forestry and land use. This must be deepened with genuine Indigenous Peoples governance roles, backed by legal recognition and community-led models, including strengthened territorial governance, customary land rights recognition, and long-term community-led stewardship arrangements.
6. **Gender and intersectionality:** Indigenous women are not systematically targeted. Proactive empowerment – beyond capacity-building – must be a programming priority (Finding 17).

4. How should the GCF evolve its operational processes and institutional capacities to maximise efficiency, access and impact, and become a partner of choice for developing countries, Accredited Entities, in particular Direct Access Entities, and other partners?

Recommendations:

1. **Rebalance internal expertise:** The GCF currently has two full-time Indigenous Peoples specialists - one focusing on policy and the other on investment, project design and implementation. This is not enough, given the diversity and complexity of Indigenous issues across 128+ relevant projects. USP-3 must commit to onboarding adequate and proportionate levels of safeguards expertise, human rights expertise, Indigenous expertise and thematic expertise, including Indigenous specialists, across divisions and within the Secretariat, including for monitoring and evaluation.
2. **Mainstream the Indigenous Peoples Policy:** The Indigenous Peoples Policy is insufficiently integrated into operational frameworks. This must be corrected (Finding 3). USP-3 should explicitly require integration of Indigenous-related considerations into the Integrated Results Management Framework, Monitoring and Accountability Framework, evaluation systems and annual performance reporting. This should include mandatory Indigenous-related reporting sections for projects operating in or near Indigenous territories, Indigenous-disaggregated beneficiary data wherever applicable, and portfolio-level indicators tracking governance, participation, knowledge systems and territorial outcomes.
3. **Strengthen the IPAG:** The Indigenous Peoples Advisory Group is relevant but remains under-resourced and insufficiently linked to Board decision-making, AEs and NDAs. Its institutional linkages must be formalised, including through a clearer advisory role vis-à-vis the Secretariat, NDAs, AEs and the Board, as well as strengthened participation in the review and monitoring of Indigenous-relevant funding proposals and portfolio implementation.
4. **Reduce compliance burden without weakening safeguards:** The compliance-driven approach disincentivises AEs from developing meaningful Indigenous-focused projects

(Finding 10). Simplified processes, technical support, and additional funding for IPs engagement should be introduced as incentives.

5. **Define exit strategies:** The GCF currently lacks a predetermined approach for responsibly exiting Board-approved projects. This creates risks for Indigenous Peoples when projects are terminated (Finding 19). Also, it is important to ensure channels and mechanisms for monitoring and assessing impact after project completion.
6. **Improve grievance mechanisms:** Grievance redress mechanisms at the project level are inconsistently functional. The IRM has addressed some Indigenous-related grievances, but access barriers remain significant (Findings 18–19), including barriers related to language, geographic remoteness, lack of culturally appropriate procedures, information asymmetries and unequal power relations between project implementers and Indigenous communities. Existing reporting mechanisms may also under-report grievances experienced by Indigenous Peoples. That said, the termination of FP146 Bio-Clima in Nicaragua as result of an IRM review on violations against Indigenous Peoples rights and other non-compliance issues ([C0006](#)), sets an important precedent ([IWGIA 2026](#)).

5. Which operational modalities, financial instruments, and/or innovative approaches should the GCF implement or scale up to enhance its impact in the next strategic period?

Recommendations:

1. **Grants, not loans, for Indigenous Peoples:** USP-3 should prioritise grant financing for Indigenous Peoples. Equity and loan instruments have historically favoured short-term economic benefits without adequately accounting for sustainability and long-term impact. Debt burdens must not be imposed on already impoverished communities. Operational modalities should prioritise long-term environmental and social sustainability over short-term financial returns.
2. **Direct access without excessive administrative costs:** A significant proportion of GCF resources is lost in administrative layers between the Fund and ultimate beneficiaries. Streamlined direct access for Indigenous Peoples must minimise these costs.
3. **Small and medium-scale entities and DAEs:** Prioritise working with entities with demonstrated environmental and social accountability and track records of meaningful IPs engagement.
4. **Indigenous-specific programme:** The IEU evaluation's Recommendation 4 calls for operationalising the IPs Policy's provision that GCF "may allocate funds to support IPs if required" (p.22). A dedicated programme should: allocate a portion of the GCF resources; leverage the social capital of trusted IPOs; accommodate smaller ticket sizes, longer timeframes, and greater flexibility; and include resources for FPIC throughout the project cycle. The GCF is currently the only major multilateral climate fund without a specific mechanism or commitment to support Indigenous Peoples.

5. **Indigenous guidance for Project-specific assessment approach (PSAA) and Simplified approval process (SAP):** These modalities do not sufficiently integrate Indigenous Peoples' considerations. SAP projects actively avoid Indigenous Peoples to prevent safeguard triggers; PSAA risks leaving unforeseen Indigenous Peoples impacts unaddressed post-approval (Finding 11). Both require specific Indigenous Peoples guidance and strategic focus.

6. How can the GCF strengthen its Readiness and Preparatory Support Programme (RPSP) to more effectively build institutional capacities and foster enabling environments for climate investment?

The RPSP is one of the most promising but underutilised modalities for Indigenous Peoples. Only 20% of relevant readiness grants partially supported Indigenous activities, and only 22 of 108 completion reports mentioned Indigenous Peoples.

Recommendations:

1. **Foundation for genuine country ownership:** RPSP must support countries in establishing institutional architectures that include Indigenous organisations and institutions as recognised rights-holders and governance actors in climate finance governance – not merely as consultees.
2. **Full and effective participation of Indigenous Peoples:** RPSP grants must support Indigenous Peoples' full participation in decision-making, climate finance architecture, and the development of concept notes and proposals reflecting Indigenous approaches and perspectives.
3. **Implement the Indigenous Peoples Policy's own commitments:** The Indigenous Peoples Policy (para. 97) commits the GCF to supporting specific capacity-building for Indigenous Peoples through RPSP, including consultation, advocacy, institutional building, and engagement in proposal formulation and M&E. This commitment must be operationalised systematically.
4. **Guidance for delivery partners:** The Indigenous Peoples Policy and Operational Guidelines do not specify delivery partners as responsible for implementing the Policy. The new readiness strategy's competitive DP selection process risks overlooking Indigenous Peoples. Clear guidance must be developed.
5. **Readiness Results Management Framework:** Must be updated to monitor Indigenous Peoples' engagement and contribution (Recommendation 2).
6. **Paradigm shift:** RPSP should set the foundation for long-term positive impact for people and the environment.

7. How can the GCF strengthen its Project Preparation Facility (PPF) to more effectively support the development of a robust pipeline of high-quality, bankable climate projects?

A critical observation must be stated at the outset: the GCF is a fund, not a bank. The concept of "bankable climate projects" risks distorting the Fund's mandate and spirit, particularly with respect to Indigenous Peoples, whose climate action often does not conform to conventional investment logic.

Recommendations:

1. **Recognition of Indigenous Peoples knowledge:** The PPF should explore both direct and indirect approaches to climate action. Indirect approaches, such as promoting Indigenous values, governance structures, worldviews and knowledge systems that regard nature as sacred, can deliver more durable climate outcomes than conventional investments, including purely infrastructure-based climate interventions. The IEU evaluation confirms that the engagement of Indigenous knowledge enhances project relevance and sustainability (Finding 13).
2. **Indigenous-specific PPF support:** Only 12 of 100 PPF activities provided clear evidence of being used for FPIC-related purposes. PPF must be explicitly directed to support FPIC processes, IPP/IPPF development, and IPs community outreach at the initiation of project design (Recommendation 2).
3. **Explore diverse investment criteria:** The PPF should assess projects against both direct and indirect climate action pathways, recognising that Indigenous-led conservation territories, governance systems, and knowledge transmission are legitimate and evidence-based climate interventions.
4. **Resources for meaningful engagement:** PPF must allocate resources for the time and trusted relationships required to engage Indigenous Peoples meaningfully.

8. What strategies or approaches should the GCF adopt to mobilize private sector capital for climate action at scale?

Recommendations:

1. **Private sector should contribute to, not extract from, the GCF:** Private sector actors should primarily contribute finance to the GCF rather than disproportionately relying on concessional support from it. Their responsibility to invest in climate action should not be contingent on economic return.
2. **Rights-based approach:** All private sector engagement must be guided by a rights-based approach. Environmental and social concerns must take precedence over economic return.

3. **Full information disclosure:** Complete disclosure of information about private sector projects must be ensured, particularly where Indigenous territories or resources are involved. The IEU evaluation found that private sector projects are significantly less likely to include Indigenous-related FAA conditions than public sector projects (Annex 6, Box A-6.1). This is a concerning asymmetry given that private sector AEs are often identified as most in need of safeguarding improvements.
4. **Concessional incentives for Indigenous Peoples engagement:** Where private sector actors do engage with Indigenous Peoples, concessional finance should be offered as an incentive to meet the full aspirations of the Indigenous Peoples Policy, including FPIC and benefit-sharing (Recommendation 2).
5. **No perverse incentives:** The current model creates perverse incentives for AEs – including private sector entities – to avoid programming with Indigenous Peoples to circumvent compliance costs (Finding 10). This must be addressed structurally.

9. What strategies or approaches should the GCF adopt best support the most climate vulnerable countries and communities?

Recommendations:

1. **Reframe the vulnerability narrative and recognise Indigenous Peoples leadership:** Indigenous Peoples and communities, LDCs and small island states are not inherently or passively vulnerable. Their heightened vulnerability is deeply linked to historical and ongoing processes of colonisation, dispossession, marginalisation, unequal access to resources and decision-making, and disproportionate exposure to climate impacts despite having contributed least to the climate crisis. At the same time, they are active agents of climate action and holders of irreplaceable knowledge, governance systems and stewardship practices essential for addressing climate change. USP-3 must reflect this full reality. Their climate action is grounded in diverse lifeways, territorial relationships and governance systems that contribute uniquely to mitigation and adaptation efforts.
2. **Ensure direct access for Indigenous Peoples:** The challenge Indigenous Peoples face in accessing GCF resources is often insurmountable under current arrangements. Framework innovations – including RPSP, PPF, PSAA, RfP, specific windows, and dedicated access modalities – must be developed to reach Indigenous Peoples and communities directly.
3. **Acknowledge historical responsibility and capability:** Vulnerability narratives must be accompanied by recognition of historical responsibility and differential capability. This demands genuinely concessional, grant-based support without conditionalities that replicate colonial power dynamics.
4. **Adopt an intersectional approach:** Indigenous women, youth, elders and persons with disabilities face compounded vulnerabilities. Targeted support must go beyond generic gender mainstreaming to address these intersecting dimensions (Finding 17).

10. Considering the evolving climate finance landscape and other sources of climate finance available, what should the GCF focus on to deliver the greatest impact over the next strategic period 2028-2031?

The GCF must clearly articulate what makes it a unique climate finance institution, and live up to that distinctiveness.

Recommendations:

1. **Rights-based, CBRD-aligned, with equal representation:** The GCF should clearly articulate and demonstrate what makes it a unique climate finance institution through its governance structures, funding approaches and operational strategies. Its alignment with the principle of common but differentiated responsibilities, equal representation of developed and developing countries, and growing rights-based commitments, together with commitments to transparency and strong social and environmental accountability, distinguish it from traditional multilateral development banks. USP-3 should demonstrate this distinctiveness in practice, including through a rights-based approach to Indigenous Peoples.
2. **Transformative change, not compliance:** The IEU evaluation concludes that the GCF has not contributed to a paradigm shift for Indigenous Peoples. Its contributions remain confined to financial resources and safeguarding. USP-3 must shift this: policy change, depth of change, sustainable impact and knowledge-sharing can promote transformative change.
3. **Close the gap with other climate funds:** The GCF is the only major multilateral climate fund without a specific mechanism or commitment to support IPs (Finding 7). This is unacceptable, and USP-3 must address this gap.
4. **Leverage the LCIPP and IPAG:** The GCF should use its prominent position to set standards for good faith negotiations and empowerment of Indigenous Peoples, working in active collaboration with the LCIPP FWG and strengthening the IPAG's institutional role (Recommendation 5).
5. **Social and environmental accountability:** Transparency, accountability, and robust environmental and social standards must be non-negotiable features of all GCF investments.

11. Are there any other comments or considerations for the development of the GCF's 3rd Updated Strategic Plan?

IPs should be recognized not merely as "participants or beneficiaries", but as equal partners, "co-creators, and rights-holders" in climate governance and action. The USP-3 should move beyond consultation-based approaches toward shared decision-making, where Indigenous Peoples are actively involved throughout the full project cycle from priority setting and project design to implementation, monitoring, and evaluation.

The GCF should strengthen support for Indigenous-led climate solutions by creating dedicated funding windows, simplifying direct access, and recognizing Indigenous governance systems and institutions as legitimate partners for climate finance delivery. Indigenous knowledge systems should be treated as equally valuable alongside scientific knowledge and integrated into climate strategies and monitoring frameworks.

A rights-based approach must remain central, including respect for self-determination, land and territorial rights, and Free, Prior and Informed Consent (FPIC) as an ongoing process rather than a procedural requirement. Success indicators should also move beyond financial and carbon metrics to include Indigenous leadership, governance, cultural continuity, and long-term territorial stewardship.

Ultimately, Indigenous Peoples are not only among the most affected by climate change, they are essential strategic partners in delivering sustainable and transformative climate action.

Recommendations:

1. **Continuous and meaningful engagement of Indigenous Peoples.** Indigenous Peoples and civil society organisations should be continuously and meaningfully engaged throughout the development, finalisation, implementation and monitoring of USP-3, rather than consulted only at discrete input stages. IPAG should play a formal and adequately resourced advisory role throughout USP-3 implementation, including in relation to monitoring, operational guidance and policy coherence.
2. **Commit to a timely review and strengthening of the Indigenous Peoples Policy:** The IEU benchmarking analysis (Annex 3) demonstrates that, while the GCF Indigenous Peoples Policy was relatively advanced at the time of its adoption in 2018, evolving international standards and comparator institutions – including IFAD (2022 update), AfDB (2023 ISS update), FAO and UNDP – have since advanced further in areas including self-determination, sustainability of Indigenous knowledge systems, FPIC as genuine consent rather than consultation, and direct access to finance. USP-3 should therefore commit to a timely review and strengthening of the Indigenous Peoples Policy in alignment with evolving international standards and Indigenous Peoples’ priorities and perspectives.
3. **Avoid conflation of Indigenous Peoples with generic vulnerability categories:** Indigenous Peoples are distinct collective rights-holders under international law. The interchangeable use of terms such as “vulnerable”, “disadvantaged” and “Indigenous Peoples” across GCF frameworks risks erasing Indigenous Peoples’ distinct rights, governance systems, identities and political status (Annex 4). USP-3 should commit to resolving these conceptual and operational inconsistencies across policies and programming frameworks.

References

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