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Indigenous First Nation Advocacy South Africa
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15th April 2026

IFNASA STRATEGIC ADDITIONS & ENHANCEMENTS

1. Reframe Indigenous Peoples as *Delivery Partners*, not Beneficiaries

We are currently engaging some of the big accountings firms in South Africa in making sure that they assist us with developing capacity so that we too become an accredited '*Implementing Agency*', so it's important that our Indigenous Peoples rethink being 'Beneficiaries Exclusively' to ***Delivery Partners***. The current text positions Indigenous Peoples largely as *recipients* of finance. This is politically safe but strategically limiting.

IFNASA addition:

Indigenous Peoples (IP) should be recognized not only as *recipients* of climate finance, but as **primary delivery partners and co-implementing institutions** of climate action. Evidence across multiple ecosystems demonstrates that Indigenous territorial governance systems deliver measurable outcomes in biodiversity protection, carbon sequestration, and climate resilience. Climate finance architecture should therefore be reoriented to contract directly with Indigenous institutions as implementing entities, rather than treating Indigenous Peoples as downstream beneficiaries.

Why this matters:

- Shifts power from NGOs/intermediaries → Indigenous institutions
- Aligns with performance-based finance logic (results-based climate finance)
- Positions IP's as an institutional actor, not simply an advocacy body



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2. Introduce an “Indigenous Climate Finance Window” (Concrete Mechanism)

Looking at this mechanism, the submission calls for access but does not specify a **financial instrument design**.

Add a concrete proposal:

The work programme should explore the establishment of a **dedicated Indigenous Climate Finance Window** under existing financial mechanisms (including the Green Climate Fund and Global Environment Facility), or as a standalone facility.

This window should:

- Provide **direct access accreditation pathways** for Indigenous institutions
- Operate primarily through **grant-based finance**
- Support **territorial-scale, long-term programming (10–20 years)**
- Include **Indigenous governance structures** in funding decisions
- Ringfence allocations specifically for Indigenous Peoples

Why this matters:

- Moves from principles → institutional architecture
- Mirrors successful vertical funds in climate finance
- Makes the submission actionable for negotiators

3. Strengthen the Legal Argument (Beyond UNDRIP)

The reference to United Nations Declaration on the Rights of Indigenous Peoples is critical, but we should deepen the legal weight.



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Add:

Let's think about it, climate finance delivery must be consistent with binding and interpretive international legal frameworks, including:

- International Covenant on Civil and Political Rights (self-determination)
- International Covenant on Economic Social and Cultural Rights (livelihoods, development rights)
- International Labour Organization Convention 169 (where applicable)

Failure to align climate finance with these frameworks' risks exposing financing entities and implementing partners to **legal, reputational, and fiduciary risks**.

Why this matters:

- Speaks to lawyers, not just policymakers
- Introduces **risk language** (which finance institutions respond to)

4. Add an African & First Nations Gap (Critical Missing Layer)

Our African context and the contestation of Indigenous Peoples demand that we pay extra focus. The current submission is global, but not regionally grounded. IFNASA would like to insert a **continental reality check**.

Add:

In the African context, and particularly for First Nations such as the San, Khoekhoe and Masai Peoples including others, structural exclusion from land ownership, legal recognition, and formal governance systems creates **compound barriers to climate finance access**.

These include:

- Lack of formal land tenure recognition
- Limited recognition of Indigenous governance institutions
- Ineligibility for sovereign-backed financing channels



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The work programme must therefore address **pre-financing conditions**, including legal recognition and institutional eligibility, without which Indigenous Peoples remain structurally excluded regardless of reforms to finance architecture.

Why this matters:

- Links climate finance to land justice (our core work)

5. Introduce “Intermediary Cost Leakage” (Quantify the Problem)

The submission mention intermediaries, but not in financial terms.

Add sharper framing:

Current climate finance delivery models are characterized by **intermediary cost leakage**, where a significant proportion of allocated finance is absorbed at multiple institutional layers before reaching Indigenous territories.

The work programme should assess:

- Percentage of funds lost to intermediaries
- Time delays in disbursement
- Reduction in programmatic effectiveness due to layered delivery

Why this matters:

- **Efficiency loss metrics**



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6. We would like to Push for FPIC as a *Financing Condition*, not Safeguard

As things stand, FPIC is framed as a safeguard. Respectfully, that's weak.

Proposed upgrade:

Free, Prior and Informed Consent (FPIC) should be established as a **precondition for the approval and disbursement of climate finance**, rather than as a downstream safeguard.

Financing mechanisms should require demonstrable FPIC compliance prior to project approval, with independent verification mechanisms.

Why this matters:

- Moves FPIC from ethics → enforceable gatekeeping mechanism

7. We would like to add a Results-Based Climate Finance Angle

This is a gap in the current submission.

We would like to add:

The work programme should explore **results-based climate finance models** that recognize and reward Indigenous Peoples' contributions to:

- Carbon sequestration
- Biodiversity protection
- Ecosystem stewardship



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Such approaches must ensure that benefits flow directly to our Indigenous communities and do not create new forms of commodification or external control over our Indigenous territories.

Why this matters:

- Aligns Indigenous priorities with global climate finance trends
- Opens access to larger funding pools

8. Strengthen the Participation Argument (Governance Power)

The submission argues for participation, push further into **decision-making authority**.

Proposed upgrade language:

Participation should evolve into **shared governance**, including:

- Indigenous representation on funding boards
- Co-decision authority on allocation priorities
- Veto mechanisms where Indigenous rights are at risk

9. Add a Closing Strategic Paragraph (High Impact)

The submission currently ends procedurally. It should end politically.

Suggested closing:

Climate finance reform represents a structural nuance point. Without deliberate correction, existing systems will continue to reproduce exclusion, inefficiency, and rights violations.



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Indigenous Peoples are not marginal stakeholders in this process; we are central to the success of global climate action. Ensuring that climate finance reaches our Indigenous territories directly, equitably, and in alignment with Indigenous governance systems is not only a matter of justice, but a prerequisite for effectiveness.

The work programme must therefore move beyond incremental adjustments and deliver **structural transformation** in how climate finance is accessed, governed, and implemented.

Yours sincerely,

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