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Submission to the Standing Committee on Finance (SCF)

Call for Evidence for the Seventh Biennial Assessment and Overview of Climate Finance Flows

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1. Introduction

This submission responds to the Standing Committee on Finance (SCF) call for evidence for the preparation of the Seventh Biennial Assessment and Overview of Climate Finance Flows. It contributes methodological considerations, evidence from existing assessments and reports, and recommendations relevant to the preparation of the Seventh Biennial Assessment, including the section informing the first report on progress towards achieving the New Collective Quantified Goal on Climate Finance (NCQG).

In this context, paragraph 26 of Decision 1/CMA.6 (NCQG) urges Parties to promote the inclusion of, and extend the benefits of climate finance to, Indigenous Peoples, among others. This highlights the importance of methodologies capable of assessing climate finance relating specifically to Indigenous Peoples.

This submission therefore examines existing approaches to tracking climate finance relating to Indigenous Peoples, identifies methodological limitations in current reporting and assessment practices, and proposes considerations that could strengthen future assessments of climate finance relating to Indigenous Peoples by the SCF, including for the preparation of the first report on progress towards achieving the NCQG.

2. Existing evidence and methodological gaps

2.1 Existing methodologies provide only limited visibility of climate finance relating to Indigenous Peoples

Existing tracking and reporting methodologies do not provide sufficient information to determine how climate finance reaches Indigenous Peoples. Studies consistently identify the same limitation: current reporting systems do not transparently identify whether climate finance is accessed by Indigenous Peoples, through which delivery pathways it is channelled, or whether Indigenous Peoples receive funding through their own institutions, or through intermediary organizations, multilateral or national implementing entities, or broader programmes.

This limitation is evident in early efforts to quantify climate finance relating to Indigenous Peoples. Rainforest Foundation Norway found that only around 0.13% of climate-related Official Development Assistance (ODA) mentioned an Indigenous Peoples' (or *local community*) organization in the project implementation description. Because the available donor reporting did not identify whether Indigenous Peoples' organizations actually received funding, the study used references to Indigenous organizations in project implementation descriptions as a proxy indicator. It also found that most funding was channeled through multilateral institutions and large international intermediaries, limiting the ability to determine how much funding ultimately reached Indigenous Peoples or their own organizations.[1]

The latest *State of Funding for Tenure Rights* report finds that although funding for Indigenous Peoples' (and for *local communities*) tenure rights has increased significantly following the COP26 Forest Tenure Pledge, funding pathways have not fundamentally changed. Bilateral and multilateral providers continue to rely predominantly on intermediaries, while direct support to Indigenous Peoples' organizations remains limited. The report therefore demonstrates that existing reporting systems remain insufficient to determine how much funding ultimately reaches Indigenous Peoples.[2]

The assessments reviewed above primarily focus on funding for Indigenous Peoples' land tenure rights and forest management. Although these areas make an important contribution to climate action, they provide only a partial picture of climate finance relating to Indigenous Peoples across mitigation, adaptation, loss and damage, and just transition.

IIED's report *Locally Implemented or Locally Led? Tracking Finance for Community Climate Action* found that only around 0.7% of reported climate finance records mentioned the keyword "Indigenous". Even this figure cannot be interpreted as an estimate of climate finance relating to Indigenous Peoples, as keyword searches do not distinguish whether Indigenous Peoples are the intended beneficiaries, one of several beneficiary groups, or whether the term is used in a different context altogether (e.g., referring to *Indigenous or endogenous technologies*, without referring to legal, social, and political term *Indigenous Peoples*).[3]

Further, IIED's analysis of locally led climate finance concludes that existing reporting systems do not provide sufficient information to distinguish between locally implemented and locally led finance. Rather than relying solely on financial volumes, the study develops an analytical framework to classify different relationships between finance and local actors. This

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[1] Rainforest Foundation Norway. (2021). Falling Short: Donor Funding for Indigenous Peoples and Local Communities to Secure Tenure Rights and Manage Forests in Tropical Countries (2011–2020). https://www.regnskog.no/uploads/documents/Publikasjoner/Andre-rapporter/RFN_Falling_short_2021.pdf; Gjefsen, T. (2021). Indigenous people get less than 1% of climate funding? It's actually worse (commentary). Mongabay, 19 November 2021. https://news.mongabay.com/2021/11/indigenous-people-get-less-than-1-of-climate-funding-its-actually-worse-commentary/

[2] Rights and Resources Initiative and Rainforest Foundation Norway. (2025). State of Funding for Tenure Rights: Donor Funding for Indigenous Peoples, Local Communities, and Afro-descendant Peoples (2011–2024). https://rightsandresources.org/wp-content/uploads/2025-State-of-Funding_v5.pdf

[3] Treichel, P., Joshi, R., Taylor, E. N., Ridout, M., Mitchell, P., and Acuda, A. (2025). Locally Implemented or Locally Led? Tracking Finance for Community Climate Action. International Institute for Environment and Development. https://www.iied.org/22674iied

illustrates that improving transparency increasingly requires methodologies capable of distinguishing different forms of finance, rather than simply measuring overall funding volumes.

Taken together, these studies demonstrate that existing methodologies face multiple limitations in tracking climate finance relating to Indigenous Peoples. Proxy indicators, keyword searches and aggregate beneficiary categories provide only limited information on whether climate finance is specifically intended for Indigenous Peoples, how it reaches them, and the role of Indigenous Peoples in its design and implementation, as well as their benefits for Indigenous Peoples.

2.2 Existing methodologies do not adequately capture accessibility, governance and the distinct needs and circumstances of Indigenous Peoples

The methodological limitations identified above are particularly significant in light of Decision 1/CMA.6. Existing reporting systems primarily identify financial commitments or beneficiary groups, but provide comparatively little information on the accessibility of climate finance, the pathways through which finance reaches Indigenous Peoples, the governance arrangements under which climate finance is designed and implemented, or the extent to which Indigenous Peoples exercise decision-making, or benefit from climate finance.

These limitations have been identified across multiple assessments. The Independent Evaluation of the Green Climate Fund's Approach to Indigenous Peoples concludes that, although the GCF has established a robust Indigenous Peoples Policy and has been effective in strengthening safeguards, existing information remains insufficient to determine whether climate finance effectively reaches Indigenous Peoples or delivers culturally appropriate benefits.[4]

These methodological limitations are particularly relevant because Indigenous Peoples have a distinct legal status under international law. Unlike broad beneficiary groups or vulnerable populations, Indigenous Peoples are collective rights-holders with internationally recognized rights relating to self-determination, self-government, legal and juridical systems, right to representation and participation in decision-making, free, prior and informed consent, and ownership and control over their lands, territories and resources. These distinct characteristics and circumstances of Indigenous Peoples provide the basis for developing methodologies capable of assessing not only whether climate finance reaches Indigenous Peoples, but also how it is accessed, governed and implemented through their own representative institutions and governance systems.

A further methodological limitation concerns the beneficiary categories used in existing reporting systems. Many climate finance reports, assessments and databases aggregate Indigenous Peoples with the term *local communities* (e.g., through the use of the combined term *Indigenous Peoples and local communities* or the abbreviation *IPLCs*) or broader categories such as *vulnerable groups* or *marginalized communities.*

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[4] Green Climate Fund Independent Evaluation Unit. (2025). Independent Evaluation of the Green Climate Fund's Approach to Indigenous Peoples. https://ieu.greenclimate.fund/evaluation/IP2024

Such conflation undermines the distinct, internationally recognized rights and status of Indigenous Peoples,[5] and prevents the effective assessment of climate finance relating specifically to Indigenous Peoples.

In this regard, the United Nations Permanent Forum on Indigenous Issues (UNPFII), in its twenty fifth session, *urges financing mechanisms to adopt an approach based on distinctions, without conflating Indigenous Peoples with local communities or other social groups, and to refrain from invoking the absence of national legal recognition to exclude Indigenous Peoples from the application of safeguards.*[6]

This is particularly important because the term *local communities* does not have an agreed legal definition and might be used to refer to a wide range of actors, groups, or communities, depending on the context. Finance reported as benefiting the combined term *Indigenous Peoples and local communities*, might, for instance, refer to benefits to the general population or community in any given area, without distinction to the unique rights, status, territories and governance system of Indigenous Peoples.

Consequently, reporting through the use of such conflated terminology does not allow determination of the extent to which climate finance reaches Indigenous Peoples, nor does it permit assessment of climate finance relating to Indigenous Peoples as contemplated in paragraph 26 of Decision 1/CMA.6.

In sum, existing reporting methodologies remain insufficient both to accurately quantify climate finance relating to Indigenous Peoples and to assess important characteristics of that finance, including the intended beneficiaries of climate finance, delivery pathways, governance arrangements, accessibility, outcomes, the extent to which it delivers culturally appropriate benefits, and its alignment with Indigenous Peoples' self-determined priorities.

2.3 Different ways in which climate finance may relate to Indigenous Peoples

Existing evidence also demonstrates that climate finance may relate to Indigenous Peoples in different ways. Those may be characterized as follows:

2.3.1 Indigenous Peoples as one of several indirect beneficiaries in broader programmes Existing assessments indicate that climate finance relating to Indigenous Peoples is predominantly identified through broader programmes in which Indigenous Peoples are one of several intended beneficiary groups. IIED, for example, found that many GEF projects targeted towards Indigenous Peoples identified them as indirect beneficiaries,

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[5] Joint statement by the United Nations Permanent Forum on Indigenous Issues, Special Rapporteur on the Rights of Indigenous Peoples, and the Expert Mechanism on the Rights of Indigenous Peoples, July 2023.
https://social.desa.un.org/issues/indigenous-peoples/news/joint-statement-by-the-un-mechanisms-of-indigenous-peoples

[6] United Nations Economic and Social Council (ECOSOC). (2026). Report of the 25th session of the Permanent Forum on Indigenous Issues. UN Doc. E/2026/43-E/C.19/2026/6.
https://digitallibrary.un.org/record/4115854?v=pdf

rather than direct recipients of funding, meaning that project-level estimates do not reflect the actual amounts of funding reaching Indigenous Peoples.[7]

2.3.2 Climate directed towards supporting actions led by Indigenous Peoples. A second category concerns finance supporting actions led by Indigenous Peoples through their own representative institutions and governance systems. This approach has been adopted by the Global Biodiversity Framework Fund (GBFF), which distinguishes actions *by* Indigenous Peoples, emphasizing self-determined priorities, representative institutions and implementation led by Indigenous Peoples.[8] The approach has also recently been adopted across the GEF through the GEF-9 Policy Directions, which introduce a 20% target relating to directing funds towards Indigenous Peoples (and local communities).[9]

At the same time, independent analysis of the first GBFF portfolio found that projects reporting allocations towards this target frequently did not demonstrate corresponding budget allocations or evidence of implementation led by Indigenous Peoples. It finds that the amounts reported as supporting actions by Indigenous Peoples (and *local communities*) substantially overstated the extent to which funding was actually directed towards Indigenous Peoples. The analysis concluded that only one of the first 40 approved projects was clearly directed towards Indigenous Peoples, while only one other project contained any identifiable budget allocation for work with Indigenous Peoples.[10]

2.3.3 Climate finance disbursed to Indigenous Peoples' own institutions and organizations.

A third category concerns climate finance that is disbursed to Indigenous Peoples' representative institutions, organizations or Indigenous-led funding mechanisms, enabling Indigenous Peoples to manage financial resources through their own governance systems. This category is distinct from climate finance supporting actions led by Indigenous Peoples, as it focuses on who ultimately receives and manages the financial resources. Existing assessments indicate that most funding relating to Indigenous Peoples continues to be channelled through multilateral institutions, international NGOs and other intermediary organizations, with little funding ultimately reaching Indigenous Peoples' own organizations.[11]

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[7] International Institute for Environment and Development. (2025). Limited GEF Finance for Nature Reaching the Local Level: Key Findings and Recommendations from IIED Research for Funders of Nature and Climate Finance, Specifically the Global Environment Facility. https://www.iied.org/sites/default/files/pdfs/2025-05/22637iied.pdf

[8] Global Environment Facility (GEF). (2025). Guidelines on Actions by Indigenous Peoples and Local Communities. Council document GEF/GBFF.5/Inf.04. https://www.thegef.org/sites/default/files/documents/2025-12/EN_GEF.GBFF_.C.05.Inf_.04_Guidelines%20on%20Actions%20by%20IPLCs.pdf

[9] Global Environment Facility (GEF). (2026). Policy Directions for GEF-9. Council document GEF/R.9/Inf.14. https://www.thegef.org/council-meeting-documents/gef-r-09-inf-14

[10] Survival International. (2025). How the Global Biodiversity Framework Fund Fails Indigenous Peoples and Local Communities. London: Survival International. https://assets.survivalinternational.org/documents/2673/original-54b1d89df8931704423ecfe0661cf423.pdf

[11] Rights and Resources Initiative and Rainforest Foundation Norway. (2025). State of Funding for Tenure Rights: Donor Funding for Indigenous Peoples, Local Communities, and Afro-descendant Peoples (2011–2024). https://rightsandresources.org/wp-content/uploads/2025-State-of-Funding_v5.pdf

Separately, the Forest Tenure Funders Group (FTFG), the coalition of bilateral and philanthropic donors behind the US$1.7 billion Indigenous Peoples and Local Communities Forest Tenure Pledge announced at COP26 in Glasgow in 2021, reports that direct funding to Indigenous Peoples and *local community* organizations as part of the Pledge, increased from 2.9% in 2021 to 7.6% in 2024.[12] The report notes that some indicators rely on donor estimates, cover only a portion of reported funding, and should be considered approximations. It also aggregates Indigenous Peoples with term *local communities* within a single reporting category, limiting the ability to assess funding relating specifically to Indigenous Peoples.

3. Implications for future climate finance tracking under the NCQG: An analytical framework to track climate finance as it relates to Indigenous Peoples

The evidence presented above demonstrates that existing reporting methodologies do not provide sufficient information to fully assess climate finance relating to Indigenous Peoples. While progress has been made in improving transparency regarding climate finance flows, important methodological limitations remain concerning how climate finance relating to Indigenous Peoples is identified, how it reaches Indigenous Peoples, and the role of Indigenous Peoples in its governance and implementation.

An analytical framework for improving tracking of climate finance relating to Indigenous Peoples could therefore consider three complementary dimensions.

- **Purpose:** Whether climate finance includes Indigenous Peoples among several intended beneficiary groups, is directed to support actions led by Indigenous Peoples, or intended to directly support Indigenous Peoples' own representative institutions or organizations.
- **Delivery:** The pathways through which climate finance reaches Indigenous Peoples, including directly through Indigenous Peoples' own representative institutions or organizations, or indirectly through intermediary organizations, multilateral or national implementing entities, or broader programmes.
- **Governance:** The governance arrangements through which climate finance is designed, implemented and managed, including the extent to which Indigenous Peoples exercise decision-making through their own representative institutions and governance systems.

Considering these dimensions would provide a more comprehensive understanding of climate finance relating to Indigenous Peoples. It would also strengthen future assessments of accessibility, effectiveness and transparency while providing a more robust evidence base for understanding how climate finance supports Indigenous Peoples.

4. Proposed recommendations for consideration by the Standing Committee on Finance

[12] Forest Tenure Funders Group. (2025). Indigenous Peoples and Local Communities Forest Tenure Pledge: Annual Report 2024–2025. https://www.tenurepledge.org/ftfg-annual-report-2024.pdf

Recommendation 1: Reflect the evidence and methodological considerations presented in this submission in the Seventh Biennial Assessment. The evidence presented in this submission identifies important information and methodological considerations relating to existing approaches to tracking climate finance. The Seventh Biennial Assessment provides an opportunity to reflect these findings, as appropriate, particularly in the discussion of methodological issues, the assessment of climate finance effectiveness, accessibility and outcomes, and the section informing the preparation of the first report on progress towards achieving the New Collective Quantified Goal on Climate Finance.

In doing so, the report should use clear and consistent terminology by referring to *Indigenous Peoples*, in line with Decision 1/CMA.6, paragraph 26, rather than combining or aggregating the term with broader stakeholder categories.

Recommendation #2: Apply the proposed framework in this submission to existing information sources. While this submission draws on evidence from existing assessments and reports, it has not itself analysed the broad range of information sources, such as information reported through the UNFCCC Enhanced Transparency Framework and Biennial Transparency Reports, the OECD Development Assistance Committee Creditor Reporting System (OECD DAC CRS), and other sources.

The SCF may therefore wish to consider applying the framework proposed in this submission to these and other relevant sources of information, with a view to strengthening assessments of climate finance relating to Indigenous Peoples and informing future reports on progress towards achieving the NCQG.

Recommendation #3: Encourage climate finance providers and data aggregators to strengthen methodologies to track climate finance as it relates to Indigenous Peoples. The SCF may also wish to consider including the following recommendation among the recommendations arising from the Seventh Biennial Assessment:

> *Encourages climate finance providers, multilateral climate funds, multilateral development banks, bilateral providers and data aggregators to strengthen methodologies for tracking climate finance relating to Indigenous Peoples, including by improving the availability and transparency of information on intended beneficiaries, delivery pathways, governance arrangements, accessibility and benefits, as they relate to Indigenous Peoples.*

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