FP019: Priming Financial and Land-Use Planning Instruments to Reduce Emissions from Deforestation (UNDP), Ecuador

CSO comments on the project given as intervention during the $14^{\rm th}$ GCF Board Meeting, October 2016

- While acknowledging the potential adverse impacts on human rights, the project document doesn't provide concrete measures for mitigating such impacts. Instead it indicates its intentions to rely on the country's UNFCCC safeguards information system, which is still being formulated.
- Free, Prior, and Informed *Consultation* is listed as a human right and basic enabler for the recognition and protection of the human rights of affected population, and that "when needed', the UNDP/UN-REDD-developed Free, Prior, and Informed *Consent* guidelines will be applied. It is therefore not clear under which conditions FPI-Consultation, as opposed to FPI-Consent, will be applied, as well as who determines which is to be applied.
- On stakeholder engagement, the project is overly reliant on consultations previously undertaken under the process related to development of the Ecuadorian REDD+ Action Plan. However, the issues under consideration in the GCF project could be fundamentally different from those associated with REDD+ action planning, especially given the potential for community displacement with reviewing of Indigenous Peoples' life plans. This point is also in line with ITAP's comment on stakeholder engagement.
- On gender, the project commits to the promotion of equal participation of men and women throughout the entire project cycle with little evidence of strategies to make this happen. The project lacks a real gender strategy; the existence of a regulatory framework on gender inclusion is not enough to guarantee gender-responsive implementation. The Board should condition the project's funding on the provision of a meaningful strategy.
- Overall, livelihood- and ecosystem (including forests)-oriented interventions are increasingly coming to the GCF for
 consideration for funding. Consequently Indigenous Peoples and local communities whose livelihoods are heavily
 dependent on nature-based resources are potentially adversely impacted. This demonstrates the urgent need for
 the GCF to expeditiously develop its own environmental and social management system and consider a stand-alone
 Indigenous Peoples policy.
- Sub-component 3.2, Strengthen mechanisms for integrated water resource management (IWRM) in the watersheds located within prioritized areas, includes support for conservation and restoration projects undertaken by Water Funds (WF). Activities include reforestation and conservation in the upper river basins that will reduce costs associated with the sedimentation of hydroelectric facilities (pg. 5). Our concern lies in the lack of clear identification of the dams that would be favored by the restoration of watersheds. Without knowing which or how many will be favored, GCF resources could eventually be misused. Favored dams should be already existing and functioning dams, not planned or under construction dams that have yet to cause socio-environmental damage. Further, recent scientific studies have shown that large dams actually contribute to climate change due to substantial amounts of GHG emissions, particularly in tropical rainforests, in addition to other serious environmental and social harm.