

## FP001 Building the Resilience of Wetlands in the Province of Datem del Marañón (PROFONANPE), Peru

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*CSO comments on the project given as intervention during the 11<sup>th</sup> GCF Board Meeting, November 2015*

We believe is important to look at this project carefully, as it impacts indigenous peoples, their lands, and their livelihoods; over 21,000 indigenous peoples in 120 communities will be impacted.

While the proposal includes information about PROFONANPE's **efforts to consult** with communities, **there are several concerns** that we would like to raise about the consultation process:

On consultation:

1. The project proposal mentions that the project will ensure full respect for indigenous peoples. It will be implemented in indigenous territories where activities **can only be carried out with Prior Informed Consent**. (pag 51)
2. There is some conflicting information about whether the proposal will be carried out in areas where some communities have rejected the possibility of the project being implemented in their territory. **We have received communications expressing concerns** about an apparent lack of adequate consultation. Based on the project information provided, **it is not clear** whether all **affected communities have been consulted**. There is simply not enough evidence that all representatives from communities have been consulted. **More information is needed to confirm that all the communities have been involved in the consultation process** for the project to be implemented in their territories. We are talking about Fundamental rights here.
3. The Government of Peru is obliged by international law and standards and its law of public consultation, to obtain **free, prior, informed consultation** from IP communities, which is consistent with international law (UNDRIP and ILO 169, in particular).
4. Due to **little evidence** that adequate consultation requirements have been met for the project and the bad precedent that its pre-mature approval by the Board at this time would set for future projects involving Indigenous Peoples, we think is important to **delay the decision to allow further investigation in order to ensure that all required standards** have been met.

FINALLY On other matters:

5. A Proper Grievance mechanism- The project mentions the use of a web platform for monitoring and evaluation and grievances. However, a lot of the communities do not have access to the internet and in some cases would need two days to travel to the nearest location with the internet. For a web platform to work, there needs to be funding for dedicated staff to collect data in communities that can be later uploaded onto the web platform. The question is if this is good enough to address grievances that may arise. This is very particularly important given that the GCF accountability mechanisms are not yet up and running.
6. On Gender. While it is good the project proposal mentions the need for the consideration of the special role of women in particular in connection with bio business development and training activities, but there is no clarity on how this will work. It seems no thorough social and gender assessment as required by the GCF gender policy was done for this project.

We urge **no decision on this proposal** at this meeting until more information and clarity is available regarding consultation issues with indigenous communities, which could have potentially huge reputational impacts for the fund. It is fundamental for the GCF to respect indigenous decision-making mechanisms, this is essential to the legitimacy of any engagement with indigenous peoples.