



43rd Board Meeting of the Green Climate Fund

October 27-30, 2025, Songdo, Incheon, Republic of Korea

GCF Observer Network of Civil Society, Indigenous Peoples, and Local Communities

Intervention on

FP284: Amazonia Viva Program

Access the document: <https://www.greenclimate.fund/document/gcf-b43-02-add18>

Thank you, co-chair.

We recognize the importance of allocating adequate climate funds to the conservation of the Amazon biome, including by recognizing and supporting the vital role that Indigenous Peoples play as stewards for Amazon forest and biodiversity conservation. However, we are deeply concerned about the fundamental flaws in this programme, particularly regarding the significant shortfalls in its engagement of and support for Indigenous Peoples.

First, as the Independent Technical Advisory Panel (ITAP) highlighted, the efficiency and appropriateness of this programme is questionable, as it channels a large amount of scarce highly concessional GCF resources through the World Bank for activities that could, in principle, be implemented directly by the GCF network of direct access entities, as two of the executing entities are national direct access entities. Instead, there will be at least two levels of administrative cost recovery. Also, the additionality that GCF resources are supposed to ensure is not guaranteed as many of the sovereign investment loans by the World Bank would likely have happened anyway under a funding initiative that is already well established with World Bank, IFC and IDB engagement. The real benefit seems to be bragging rights for the GCF to claim a large amount of co-financing, while the World Bank profits from the higher concessionality that the GCF offers to prop up its investment loans.

Secondly, Component 1 is based on the deployment of sovereign loans to governments and investment loans to financial intermediaries, reinforcing a credit-based approach that risks deepening reduced fiscal space and debt vulnerabilities of countries that are already facing fiscal and debt burdens. In addition, while said approach is argued to serve smallholders, this design ultimately favors financial intermediation and investments in an “enabling environment.” This enabling environment is designed for uptake of future, mostly non-concessional credits through local financial intermediaries by some of the most vulnerable actors.

Furthermore, during initial consultations with national Indigenous Peoples’ organizations, the World Bank stated its intention to facilitate direct access for Indigenous Peoples. However, this dedicated facility, the basis of gaining initial support, did not materialize in the final proposal. All that is left is a vague and unconvincing reference that “[t]he program may also consider dedicating a portion of resources in each country to locally-led climate action...” In fact, it is glaringly evident that there is zero allocation explicitly dedicated for direct access by Indigenous Peoples. The proposal relies heavily on traditional MDB models that prioritize

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government and financial intermediary channels, which inherently marginalize the communities it claims to serve. Moreover, although an Indigenous People's Plan was reportedly prepared, it is notably missing from the annexes that were provided for public scrutiny. These references to affected and vulnerable people seem to provide a cover for business-as-usual lending approaches.

Indeed, the Gender Assessment was apparently developed solely from desk research, missing any consultations with local women's organizations. We are additionally concerned that the AE with all its capacity and claimed expertise was only able to present an "Indicative Gender Action Plan", which is not what the Gender Policy requires, instead of an actual programme-level Gender Action Plan.

Finally, we note that within the so-called innovative financial instruments introduced, there is little clarity on the extent to which the program may facilitate carbon and biodiversity credits, which are mentioned only tangentially in the proposal; the responses provided during the technical session and in writing recognize the discretion of executing entities to convert emissions reductions to carbon credits.

In our view, this programme proposal fails on several fronts, not the least by treating local communities and Indigenous Peoples in the Amazon biome as a verbal embellishment for traditional loan operations. Should the Board decide to approve this programme despite our concerns, as a minimum condition for approval, we call for at least 20% of the funding to be allocated for direct access by Indigenous Peoples, including through Indigenous Peoples-led funds in the region. However, such a funding allocation at programme or project level cannot replace, nor is it an alternative for a dedicated direct access window for Indigenous Peoples in the GCF, as repeatedly recommended by the recent IEU evaluation.

Further, the proposal must include a dedicated seat for Indigenous Peoples within the Project Management Unit (PMU) to ensure their meaningful participation in decision-making processes at the national and subnational levels. Lastly, before the FAA comes into effect, the Accredited Entity must present, in a manner that is acceptable to the secretariat, documentation showing how Free, Prior and Informed Consent (FPIC) of affected communities has been obtained. Only through such conditions can the project truly deliver its promises of equitable, just, inclusive and sustainable development to the Amazon people and ecosystems.