We appreciate the proposed Work Program and the opportunity to share reflections on it. We welcome in particular the proposed Inclusive Conservation Initiative. As noted in the Work Program, an estimated 80% of the world’s biodiversity is held in areas and territories governed or managed by Indigenous peoples and local communities. Yet many Indigenous peoples and local communities lack secure rights and meaningful recognition and support for their customary institutions and actions to govern and manage their resources and conserved areas and territories.

We strongly encourage GEF to make the Inclusive Conservation Initiative Project Information Document available for review.

Based on the summary of the Initiative in the Work Program document, we recommend the following:

- The language describing the Initiative should consistently make clear that it pertains to Indigenous peoples and local communities.
- The Initiative should be firmly based on the leadership of Indigenous peoples and local communities, including in all related decision-making, planning, implementation, and monitoring and evaluation, and should recognize and appropriately support the continuation and enhancement of their self-determined collective action for conservation in their territories and areas.
- The 8 to 10 countries where the Initiative will be focused should collectively cover all regions.
- The proposed Agencies for the Initiative should address the partial compliance gaps identified in the GEF “…Assessment of GEF Agencies’ Compliance with Minimum Standards…” as a matter of urgency.

Regarding the process through which this and other GEF Work Programs are developed:

- It is critical that civil society, Indigenous peoples and local communities are engaged in development, implementation and monitoring of GEF projects at all stages, in order to utilize their capacity to provide support for effective, equitable project approaches and impacts. This requires clear, accessible information about project development processes and mechanisms.
- We also recommend that those developing and approving projects consider and build on the lessons from biodiversity conservation by indigenous peoples and local communities, and the results of other GEF projects in the area, including, in particular, the Small Grants Program.
- Finally, if the GEF CSO Network is to provide meaningful feedback on the Work Program, we request that it be posted online as far in advance of the Council meeting as possible, and no less than one month, so that we can meaningfully consult our networks.

We also have reflections on a number of other specific projects and impact programs within the Work Program:

- **Sustainable Cities Impact Program:** We recommend that the major elements of transformational change be more clearly defined and that the program more clearly address the rights of people in cities who are landless, homeless or poor.

- **Food, Land Use and Restoration Impact Program:** We appreciate that the project has a strategy for stakeholder engagement through horizontal and vertical dimensions, and recommend that it include a clear strategy to promote agro-ecology and the role of women in food production and land restoration.

- **Integrated Transboundary River Basin Management for the Sustainable Development of the Limpopo River Basin:** This is a critical project for water systems in the region. We recommend that it aim to address more strategic concerns that affect water availability and quality; include capacity building for community engagement in water resources management and land use planning at the community level, including through community rights and land-use mapping; and otherwise incorporate dedicated efforts to support communities as key actors in the management of the basin.

We will submit more detailed comments on the Work Program in writing for your consideration. Thank you.
Comments to be Submitted in Writing:

We appreciate the proposed Work Program and the opportunity to share reflections on it.

We welcome in particular the proposed Inclusive Conservation Initiative. As noted in the Work Program, an estimated 80% of the world’s biodiversity is held in areas and territories governed or managed by Indigenous peoples and local communities. Yet many Indigenous peoples and local communities lack secure rights and meaningful recognition and support for their customary institutions and action to govern and manage their natural resources and conserved areas and territories.

We note that the detailed project document was not yet available for review and we therefore are unable to provide feedback on that. We strongly encourage GEF to make it available so that we may do so.

Based on the summary of the Inclusive Conservation Initiative in the Work Program, we strongly recommend that GEF consider the following recommendations:

• The introductory language in Paragraph 8 should be amended to clarify that the program pertains to Indigenous peoples and local communities, as already reflected in the more detailed description in Paragraph 19 (c). (Currently, paragraph 8 refers only to “Indigenous peoples organizations”.)

• The Inclusive Conservation Initiative should be firmly based in the empowered leadership of Indigenous peoples and local communities themselves, in all project related decisions and activities, and should recognize and appropriately support the continuation and enhancement of their self-determined collective conservation action. Empowered partnerships with Indigenous peoples and local communities and women’s groups at the local level will be critical to the Initiative. We welcome the language that reflects this spirit, and encourage GEF to further strengthen this orientation in the summary description and ensure that it is fully reflected in the project documents and practice.

• The current summary specifies that the Inclusive Conservation program will include “substantial investments in 8 to 10 countries”. We would like more information about what these countries are and how they will be identified and we strongly encourage GEF to ensure they represent all regions.

• We welcome the reference to supporting protected areas co-management and encourage the Inclusive Conservation Initiative to also appropriately support Indigenous peoples and local communities’ governance and management of conserved areas in their own territories and areas. This should include recognition and support for action on the ground and for appropriate law and policy changes.

• Likewise, any “private sector options” (as mentioned in the summary language) should be clearly and definitively defined and led by Indigenous peoples and local communities.

• Finally, we note that the GEF “Report on the Assessment of GEF Agencies’ Compliance with Minimum Standards…” highlighted partial compliance gaps on the part of the proposed Inclusive Conservation Initiative Agencies, including regarding Indigenous peoples and stakeholder engagement. As it is critical that these gaps be addressed, we welcome the commitment to doing so reflected in the Agency Compliance report and encourage GEF follow up to ensure this is completed before the Initiative begins.

We also wish to share more general reflections and recommendations on the process through which this and other GEF Work Programs are developed:

• At this stage, when Council meets, projects are far along in their development. It is critical that Indigenous peoples, local communities, and civil society are engaged in development of GEF projects at all stages. There must be a transparent and accessible process that ensures their capacity to provide constructive support to help ensure the quality of projects and their impacts can be effectively incorporated. To enable this, Indigenous peoples, local communities, and civil society need access to detailed information about the process and content of proposals in their countries and regions at early stages and throughout the process.
This includes clear and meaningful information about how GEF projects (including those in the Work Programs) are developed, who and how many people they are meant to engage and benefit (disaggregated by Indigenous peoples, local communities, and gender), and how we can meaningfully participate in their development, implementation and monitoring.

- We further recommend that developing GEF projects (including medium and large scale projects) fully recognize and appropriately incorporate and build on the lessons and successes of conservation by Indigenous peoples, local communities, and civil society. This includes many Small Grants Program projects; they are the basis for protecting large-scale territories and their results account for greater community participation, which enhances project implementation and results. To enable this learning, it is important to enhance efforts to identify and appropriately document and share information about Indigenous peoples’ and local communities’ conservation contributions, including to serve as models that can inspire and be replicated. This requires time and dedicated resources, including training opportunities.

- Related to the point above, there is a wealth of experiences on biodiversity conservation within and across countries, many of which were GEF supported initiatives. It would be beneficial for new projects to take account of and build on the results of projects that have preceded them, including to enhance coordination and continuity.

- We also encourage GEF to focus on projects that have an integrated understanding of and approach to addressing the natural and social systems in which they are implemented.

- We recognize that these issues of meaningful engagement and project coordination and learning are broader than GEF projects. However, we also recognize that GEF has the opportunity and responsibility to play a leadership role in ensuring that its projects are effectively designed and implemented, including with meaningful engagement and leadership of Indigenous peoples and local communities.

- Finally, if the GEF CSO Network is to provide meaningful feedback on the Work Program, we request that the it be posted online as far in advance of the GEF Council meeting as possible, and no less than one month in advance, so that we can meaningfully consult our networks. Related to this, the CSO network needs resources to develop and maintain a mechanism for wide engagement in these efforts.

We also have reflections on a number of other specific projects and impact programs within the Work Program:

**Sustainable Cities Impact Program**

- Given their emphasis in the Program, the major elements of transformational change should be more clearly defined.

- While there is emphasis on investment, the program does not sufficiently address the critical issues of ensuring the rights of people in cities who are landless, homeless or poor.

**Food, Land Use and Restoration Impact Program**

- The program has identified a strategy for stakeholder engagement through horizontal and vertical dimensions. However, it is missing a clear strategy to promote agro-ecology and the role of women in food production and land restoration.

**Integrated Transboundary River Basin Management for the Sustainable Development of the Limpopo River Basin (GEF ID 10182)**

- This is a critical project for water systems in the region, as it affects the socioeconomic dynamics in the region. Therefore, the project shall aim to address more strategic concerns that affect water availability and quality.
• The projects need to clearly state what type of capacity building is aimed for. We recommend that capacity be built to ensure community engagement in management of water resources at the community level.

• The project shall focus on building capacity to support and monitor land use planning at community level, as it remains the major threat to the basin. This shall be complemented by mapping current communities land rights and current land use activities;

• The sustainability of the basin is clearly dependent on communities’ involvement in integrated natural resources management. Therefore, it shall be clear how dedicated efforts to support communities as actors in the management of the basin are considered in the project.