



Re: Programme Committee Meeting on June 11, 2024

Subject: *Danish Contribution to the Global Biodiversity Framework Fund*

Consultation response from International Work Group for Indigenous Affairs (IWGIA) on the (draft) Danish contribution to the Global Biodiversity Framework Fund

IWGIA welcomes the commitment to the newly established Global Biodiversity Framework Fund (GBFF) from Denmark of DKK 100 million. Further, IWGIA welcomes the decision to dedicate 20 percent of the project budget for Indigenous Peoples and would like to emphasize the importance of Indigenous Peoples access to funding and financial resources.

We have additionally some comments and concerns that we in this response would like to address for consideration. Overall, these relate to the rights of Indigenous Peoples being explicitly included throughout the project document for the Danish Contribution to the GBFF. Furthermore, IWGIA would like to propose some text alterations in section 2. Our inputs are provided under the sections of the draft project document below.

2.1 Background

In the first paragraph, it is recommended to enter “*inter alia*”, after “Biodiversity provides us”, due to the reason, that the mentioned functions and contributions of biodiversity are not exhaustive.

In the second paragraph, it is mentioned that there are five main direct drivers of biodiversity loss, and that expansion of infrastructure poses an increasing critical driver of land-use change. Here IWGIA recommends adding that the extraction of resources, including fossil fuels, mining, logging, and other extractive activities are continuously posing fundamental threats to biological diversity, ecosystem integrity and human well-being. Indigenous Peoples are systematically confronted with the threats of resource extraction for commercial use, as these activities often takes place within their lands and territories. Therefore, Indigenous Peoples rights, (as stipulated, *inter alia*, in the UNDRIP and ILO Convention 169) should be secured and consistently prioritized. A further increasing threat to biodiversity is climate change, and because this threat is expected to grow within the coming decades, it is important to mention here as well.

In the third paragraph, after “Changing the trajectory of biodiversity loss means”, add: “*dealing with the root causes of biodiversity loss and ecosystem degradation. This entails addressing not only the direct drivers of biodiversity loss, but also the indirect or underlying drivers of change stemming from consumption patterns, global and domestic markets, economies, policies, governance etc.*¹”. This is

¹ IPBES, 2019



important to add, because the direct drivers of biodiversity loss and ecosystem degradation are a result of the indirect drivers.

In the fifth paragraph, the mention of zoonotic spill overs should be mentioned together with other consequences of loss of biodiversity or deleted. This is due to the reason that the specific focus on this subject is imbalanced in comparison to other major issues, such as climate change. IWGIA recommend adding that the continued deforestation and destruction of irreplaceable ecosystems, such as forests, wetlands, peatlands, mangroves etc., not only contributes to the continued loss of biodiversity, but also amplifies the climate change crisis and violates human rights. The loss of biodiversity is not only a threat to healthy resilient ecosystems and their vital functions and contributions, but poses also a threat for future human well-being, in particular for marginalized groups such as Indigenous Peoples. It should furthermore be added that a driving force of biodiversity loss is the extraction of resources.

In the factsheet, enter “*We are using the equivalent of 1.6 Earths to maintain our current way of life and ecosystems cannot keep up with our demands*” as the first bullet, so it is consistent with the source. This is the only bullet from the source not entered and considering that our consumption patterns constitute one of the main driving forces behind the biodiversity crises, this is important to include to present the comprehensive picture.

2.2 Context and Call to Action

In the third paragraph – Before the sentence: ‘It sets out an ambitious plan to...’ enter: “The overall objective of the framework is to halt and reverse biodiversity loss by 2030”. This is important to emphasize in the beginning of the paragraph to make it clear that this is the purpose of the GBF, and a prerequisite to obtain the 2050-vision of ‘living in harmony with nature’.

After the last paragraph, enter new paragraphs highlighting Section C of *Decision 15/4*, and include explicit reference to:

Section C.a: Contribution and rights of Indigenous Peoples and local communities

“The framework, including its Vision, Mission, Goals and Targets, is to be understood, acted upon, implemented, reported and evaluated, consistent with and acknowledging the important roles and contributions of Indigenous Peoples and local communities as custodians of biodiversity and partners in the conservation, restoration and sustainable use. Its implementation must ensure their rights, knowledge, including traditional knowledge associated with biodiversity, innovations, worldviews, values and practices of Indigenous Peoples and local communities are respected, documented, preserved with their free, prior and informed consent, including through their full and effective participation in decision-making, in accordance with relevant national legislation, international instruments, including United Nations Declaration on the rights of Indigenous Peoples, and human rights law. In this regard, nothing in this framework may be construed as diminishing or extinguishing the rights that Indigenous Peoples currently have or may acquire in the future”.

Section C.b: Different value systems



“Nature embodies different concepts for different people, including biodiversity, ecosystems, Mother Earth, and systems of life. Nature’s contributions to people also embody different concepts, such as ecosystem goods and services and nature’s gifts. Both nature and nature’s contributions to people are vital for human existence and good quality of life, including human well-being, living in harmony with nature, and living well in balance and harmony with Mother Earth. The Framework recognizes and considers these diverse value systems and concepts, including, for those countries that recognize them, rights of nature and rights of Mother Earth, as being an integral part of its successful implementation”.

Section C.c: Whole-of-government and whole-of-society approach

“This is a framework for all - for the whole of government and the whole of society. Its success requires political will and recognition at the highest level of government and relies on action and cooperation by all levels of government and by all actors of society”.

Section C.g: Human rights-based approach

“The implementation of the Framework should follow a human rights-based approach, respecting, protecting, promoting and fulfilling human rights. The Framework acknowledges the human right to a clean, healthy and sustainable environment”.

Section C.h: Gender

“Successful implementation of the Framework will depend on ensuring gender equality and empowerment of women and girls, and on reducing inequalities”.

These sections are fundamental for the implementation of the GBF and ultimately obtaining the overall objective of the GBF of halting and reversing loss of biodiversity by 2030 and should be applied consistently across all the Goals and Targets. Therefore, IWGIA strongly recommends to emphasized this under section 2.2 in the project document.

2.3 Rationale and Justification for the Establishment of the GBFF

IWGIA recommends to either change the last sentence of the first paragraph from “The financing target for the Fund was set at USD 20 billion by 2025 and USD 30 billion/year towards 3020 to: *“The financing target, as stipulated in Target 19.a, for contributions from developed countries to developing countries was set to increase total biodiversity related international financial resources to USD 20 billion/year in 2025 and USD 30 billion/year in 2030”*, or delete this sentence.

It is positive that by May this year, 22 projects were approved under the GBFF at a total sum of around USD 110 million in 24 different countries, and 35 per cent of the total funds are expected to support actions by Indigenous Peoples and local communities². Indigenous Peoples are amongst the most marginalized groups on Earth, and besides often experiencing violations of their rights as inter alia stipulated in the UNDRIP and ILO Convention 169, they also lack access to the implementation of projects and only

² <https://www.thegef.org/newsroom/press-releases/biodiversity-fund-approves-18-new-project-preparation-grants>



fractions of the funds are invested or managed by Indigenous Peoples³. This underpins the urgent need to ensure direct financing to Indigenous Peoples and their organizations. To address this major issue, the GBFF aims at allocating 20 percent by 2030 to projects which support actions by Indigenous Peoples and local communities. Here it is critical that the GBFF will ensure project support specifically to Indigenous Peoples. Due to the importance of addressing the issues of access to financial resources and the serious risks Indigenous Peoples continuously face in terms of being denied their fundamental rights in biodiversity promoting initiatives, the GBFF acknowledgement of the importance of Indigenous Peoples and the 20 percent should already be mentioned in section 2.3. It is pivotal to ensure, that the GBFF contributes to secure the rights of Indigenous Peoples, first and foremost, due to Indigenous Peoples being entitled to these rights and furthermore due to the vital importance the contributions of Indigenous Peoples constitute in the conservation and protection of biodiversity. Although this is elaborated in sections below, it is strongly recommended also to be mentioned under section 2.3.

2.4 Strategic considerations for the Danish Contribution

In relation to the new Danish TFI described in this section, it is highly advisable to enter, that the TFI will have a strong focus on Indigenous Peoples in investments and projects, and on the rights of Indigenous Peoples as a cross-cutting priority. Further, it is recommended to address that the rights of Indigenous Peoples cannot be violated in any Nature-based Solution measures, and that Denmark takes a rights-based approach to ensure that vulnerable groups, including Indigenous Peoples, are consulted, and that climate interventions do not violate any rights, as the How-To-Note no 3 on ‘Climate adaptation, Nature and environment’ provides. Here the right to Free, Prior and Informed Consent (FPIC), as stipulated in the UNDRIP should be added.

2.5 Cross-cutting Implementation Principles of the GBF Fund

It should be added that the GBFF is aligned with the work of the GEF which is guided by the UNDRIP.

3. Programme or Project Objective

It should be added that the rights of Indigenous Peoples must be protected and respected.

4. Theory of change and key assumptions

It should be added under the thematic Action Areas, that the GBFF will focus on securing the rights of Indigenous Peoples in line with the UNDRIP. Under key assumptions for the successful implementation of the GBFF, the rights of Indigenous Peoples to self-determination, FPIC and land tenure should be added as a separate bullet-point.

5. Summary of the results framework

In addition to the Danish priorities mentioned here, securing the rights of Indigenous Peoples should be added as a Danish priority.

³ OECD. (2023). A Decade of Development Finance for Biodiversity. [A Decade of Development Finance for Biodiversity | en | OECD](#)



6. Inputs/budget

IWGIA would like to highlight, that the Danish contribution to the GBFF of DKK 100 million is very positive. However, due to the reason that this amount is a single contribution for the period 2024-2030 and keeping Target 19.a in mind and the Danish obligations under Article 20 of the CBD, it is highly recommended that Denmark will plan further contributions to the GBFF preferably for each of the years of the GBF until 2030 to enable a consistent Danish financial support structure to the objectives of the GBF.

7.1 Governance and Institutional Management

IWGIA recommends to here add a reference to securing the rights of Indigenous Peoples to Danish priorities.

Annex 4 is missing from the project document.