

**PROPOSED PROJECT GCF/UNEP/EPA  
“CLIMATE-RESILIENT LANDSCAPES FOR  
SUSTAINABLE LIVELIHOODS IN  
NORTHERN GHANA”**

***PROJECT’S INDIGENOUS PEOPLES  
PLANNING FRAMEWORK (IPPF)***

***For Public Disclosure***



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## 1. Executive summary

This document outlines the Indigenous Peoples Planning Framework (IPPF), developed to ensure the meaningful inclusion of Indigenous Peoples in the implementation of the proposed climate adaptation project in Ghana. The framework is designed to safeguard the rights and participation of these vulnerable groups through the application of Free, Prior and Informed Consent (FPIC) and aligns with national and international standards on Indigenous Peoples rights.

The IPPF establishes a structured approach to stakeholder engagement and the development of Indigenous Peoples Plan (IPPs) during the project's implementation phase. Given that specific project activities and site details will only be finalised during or after project inception, the framework ensures that Indigenous Peoples are consulted and engaged based on accurate, up-to-date and context-specific information. This phased engagement approach contributes to the project's overarching goals of inclusivity, responsiveness and social equity.

The IPPF prioritises the identification, mapping and consultation of Indigenous Peoples, ensuring their active involvement in decision-making processes related to project design, implementation and monitoring. It also establishes mechanisms for mitigating potential risks and ensuring that project benefits are equitably shared, particularly among the most vulnerable groups. By facilitating continuous and meaningful dialogue with affected communities, the IPPF reinforces the project's commitment to participatory development, enhancing both the social and environmental sustainability of project interventions.

In this context, the IPPF serves as a guide for project implementers, ensuring that Indigenous Peoples are not only considered in project planning but are central to its success. Through this framework, the project aims to maximise positive social outcomes for marginalised groups, ensuring that climate adaptation efforts in Ghana are inclusive, culturally sensitive and responsive to the needs of all stakeholders.

## 2. Main purpose of the Indigenous Peoples Planning Framework

The IPPF has been developed to outline the requirements and approach to screen for the potential impact of the proposed activities to Indigenous Peoples, as well for early and ongoing consultations with project-affected Indigenous Peoples in Ghana and for developing IPP(s) under the proposed project<sup>1</sup>. These IPP(s), once completed and operationalised, will govern all further engagement Indigenous groups, ensuring their meaningful participation in the project and the appropriate management of related risks. This participation will include — but not be limited to — inclusion in stakeholder engagement processes, decision-making and the development of equitable and context-sensitive benefit-sharing strategies. While Ghana does not formally designate any group as Indigenous Peoples under national law, the GCF Indigenous Peoples Policy applies internationally recognised criteria. Accordingly, this IPPF has been developed to ensure that Indigenous Peoples or ethnic minority communities who meet these criteria—such as those with distinct cultural identities, self-identification, or historical marginalisation—are meaningfully included and protected under the project's safeguards approach. A note on the specific criteria that will be applied is provided below.

The need for the IPPF and corresponding IPP(s) has been identified as site-specific activities and details of project interventions will only be finalised during or after the project inception phase. This phased approach necessitates the development of an IPP during implementation to ensure that the engagement with Indigenous Peoples is based on finalised and context-specific information. By developing these plans during the implementation phase, the project can better reflect the actual composition of beneficiary communities and ensure that Indigenous Peoples are actively involved in the participatory and inclusive development process.

Indigenous Peoples in Ghana — such as the Fulani pastoralists and other groups that may meet the GCF's definition of Indigenous Peoples — have historically faced marginalisation and their inclusion is

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<sup>1</sup> The proposed project is being implemented in two discrete regions. These regions may be subject to different types of socio-cultural pressures that may necessitate the development of differential IPPs. Whether a single IPP or two similar IPPs will need to be developed will be determined based on the outputs of the activities described under this IPPF.

necessary for the success of the project. The IPPF will ensure that the project approach remains adaptable and responsive to the evolving local contexts in which interventions are implemented. Developing the IPPs during implementation ensures that engagement with Indigenous Peoples is based on accurate, real-time information and that their participation in the project design and implementation is meaningful and comprehensive.

The project's design has incorporated this iterative engagement process, allowing for comprehensive stakeholder mapping and consultation activities throughout the first 18 months of implementation. This will ensure that the presence, needs and priorities of Indigenous Peoples are fully considered at the point of project execution. By reducing the gap between stakeholder engagement and implementation, the project remains responsive to the needs of Indigenous Peoples, aligning with the principles of participatory and inclusive development.

The IPPF is therefore designed to guide stakeholder mapping and participatory engagement in accordance with the principles of Free, Prior and Informed Consent (FPIC), ensuring that the project meets national and international standards with respect to the rights of Indigenous Peoples. The intended outcomes of this process include: i) the identification, mapping and engagement of Indigenous Peoples that meet the relevant criteria; and ii) the collection of baseline information necessary to develop IPPs at the appropriate level to ensure that project interventions maximise positive impacts for these groups and provide equitable social and economic benefits. The specific activities that will be undertaken as part of the IPPF include:

1. Identifying, mapping and engaging Indigenous groups within the project footprint and developing a rights-based strategy to guide their participation throughout the project implementation period.
2. Respecting the rights of Indigenous Peoples, including their rights to FPIC regarding project design, implementation and monitoring of project activities.
3. Addressing potential adverse impacts through a participatory and consultative approach that emphasises inclusivity and responsiveness to the needs of Indigenous Peoples.
4. Guiding the co-development of IPPs through meaningful consultations during implementation, ensuring that these plans are tailored to the context (site level, district level, or regional level) and include operational guidelines for implementation alongside project activities. These plans will ensure that Indigenous Peoples are engaged in the design, implementation and monitoring of the project in a manner that is consistent with the principles of participatory and inclusive development.

By ensuring that the IPPs are developed during the implementation phase, the project reinforces its commitment to fostering an inclusive approach that adapts to local realities and respects the rights and aspirations of Indigenous Peoples in Ghana.

## *2.1 Note on Terminology and Criteria*

For the purposes of this framework, the term Indigenous Peoples is used in alignment with the Green Climate Fund's Indigenous Peoples Policy, which applies universally regardless of national legal recognition. The policy defines Indigenous Peoples as social groups with identities that are distinct from dominant groups in national societies and who are often marginalised or excluded. Criteria include:

- (i) self-identification as Indigenous;
- (ii) collective attachment to distinct territories or natural resources;
- (iii) distinct social, economic, cultural, or political systems;
- (iv) use of distinct languages or dialects; and
- (v) non-dominant status in the national context.

In the context of Ghana, where there is no formal legal designation of Indigenous Peoples, certain ethnic minority communities may nonetheless meet these criteria. The project will assess the presence of such groups during implementation using these characteristics to guide identification and engagement, with self-identification being the primary pre-requisite criteria. The term 'ethnic minorities' is used in the IPPF where relevant to reflect local terminology in relation to local legislation and provide context within the IPPF, but the safeguards approach will apply the GCF's specific criteria to ensure full compliance with the Indigenous Peoples Policy.

### **3. Profile of the Indigenous Peoples relevant to the project**

#### ***3.1 Brief introduction to the project***

The primary goal of the proposed project is to address the challenges posed by climate change on the livelihoods of smallholder farmers and rural communities in northern Ghana by improving food security and enhancing the agro-based rural economy. This involves a comprehensive strategy encompassing the establishment of farmer-based organisations (FBOs), improved access to credit and insurance products, strengthened institutional and regulatory systems for climate-responsive planning and development, as well as the adoption of climate-resilient agriculture, ecosystem-based adaptation and alternative climate-resilient livelihoods. The project seeks to transform the agricultural landscape in northern Ghana from one predominantly dependent on rain-fed agricultural systems to one resilient to the current and future effects of climate change.

The project strategically focuses on eight districts which were selected using a comprehensive, quantitative assessment of district-specific vulnerability to climate change that incorporates exposure, sensitivity and adaptive capacity of communities, as well as through rigorous stakeholder engagement (Annex 2: Feasibility Study and Annex 7: Community Consultations and Stakeholder Engagement Report). Yunyoo-Nasuan district split into two districts — Yunyoo-Nasuan and Bunkpurugu — during the time between the two in-country missions (Section 3.2). Thus, it appears that nine districts were consulted. The eight target districts include:

- East Mamprusi, Bunkpurugu and Yunyoo-Nasuan in the Upper East region;
- Garu Tempane and Binduri in the Northern region; and
- Wa West, Lawra, Lambussie-Karnie and Jirapa in the Upper West region.

The selected districts will undergo tailored activities, such as riverbank restoration, the construction of boreholes and check dams and the introduction of beekeeping. The site-specific approach ensures that interventions align closely with the unique challenges and opportunities present in each location, optimising the project's effectiveness in addressing local food security vulnerabilities.

The project anticipates direct benefits for 377,000 individuals in the targeted sites, including 124,410 women and 252,590 men. These individuals will experience improved food security, with a focus on climate-resilient agricultural practices and access to agricultural credit and insurance. Indirectly, the project will benefit 4.4 million individuals in the targeted districts — including 2,244,000 women and 2,156,000 men — through landscape level ecosystem benefits, spatial planning that maximises autonomous upscaling potential and knowledge sharing through the extension service.

#### ***3.2 Stakeholder mapping and engagement***

Stakeholder consultations occurred during two in-country missions. The first mission took place in April 2017 and included field visits, consultation meetings, focus group discussion and community durbar. The goal of this mission was to validate the outcomes of the initial vulnerability assessment and introduce the project concept to key stakeholders across multiple regions. In each of the targeted regions, meetings were held with institutions involved in the management of land-based livelihoods — including national, regional and local government agencies and civil society organisations (CSOs) — as well as communities and community representatives.

The second mission occurred in August 2024 and adopted a more targeted engagement methodology as the mission goal was to address specific gaps in the Funding Proposal annexes, specifically the stakeholder engagement plan (SEP), gender assessment and action plan (GAAP) and Environmental and Social Assessment and Management Framework (ESAMF). As such, engagements were focused on communities and organisations that will be involved in the implementation of the project and included: i) relevant government institutions; ii) local non-governmental organisations (NGOs) and CSOs that may partner or collaborate with the project; and iii) project participants and beneficiaries. The community engagements targeted communities which had not previously been consulted and which were selected based on their vulnerability, representativeness of the locality and limited prior project support.

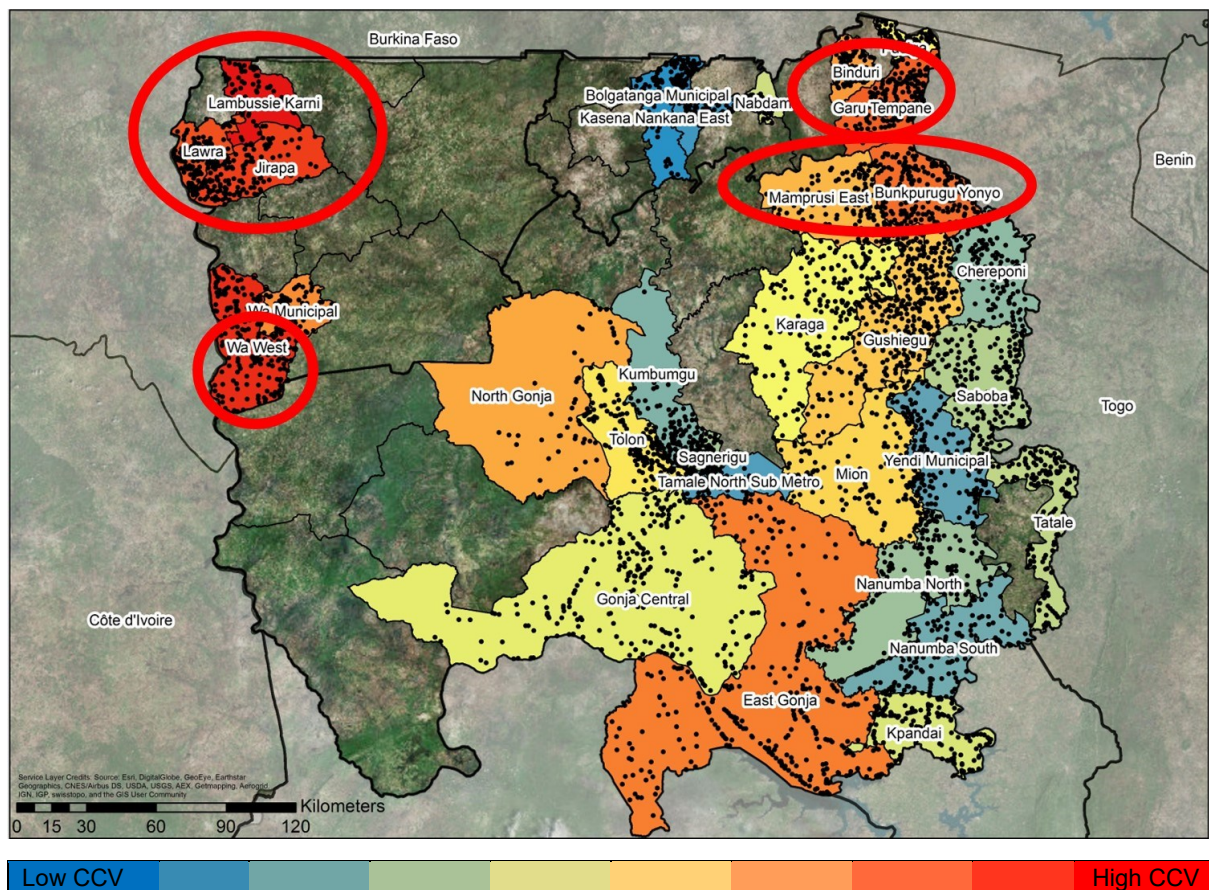


Figure 1: Map of the project target areas within the three northern regions highlighting areas in which stakeholder mapping and engagement have already taken place. Districts that are not depicted in this map are receiving support from other climate adaptation projects and thus were not considered eligible for selection. Districts highlighted in blue and green have lower climate change vulnerability (CCV) while districts highlighted in orange and red have higher CCV.

Although stakeholder engagement has been comprehensive, facilitating dedicated consultations with certain groups — such as the Fulani, or other self-identifying indigenous groups — proved challenging due to a number of factors, including their nomadic lifestyles which make them difficult to locate and their general reluctance to participate in structured engagements. Although engagements with these groups was not undertaken during the design phase of the proposed project, the need for these engagements has been identified as a prerequisite for the implementation of project activities and will be conducted throughout the implementation, monitoring and evaluation stages through a Free, Prior and Informed Consent (FPIC) procedure as outlined in the SEP (see Annex 7h). This will ensure that the needs and rights of Indigenous Peoples are considered and will support in sustaining the intended positive outcomes of the project.

### 3.3 Description of the Indigenous Peoples and other groups relevant to the project and IPPF

This section presents an overview of ethnic minority communities in northern Ghana, some of whom are considered Indigenous Peoples for the purposes of this framework. These groups are characterised by distinct cultural identities, longstanding livelihood systems, and, in some cases, historical exclusion from land tenure, decision-making, and formal services. The Fulani pastoralists are currently recognised under this framework as meeting the criteria of Indigenous Peoples. However, other ethnic minority communities — particularly those in remote or border areas — may also meet these criteria and will be identified during implementation through participatory assessments.

Northern Ghana is home to as many as 70 distinct ethnic groups, each contributing to the region's social and cultural diversity. Major groups include the Mole-Dagbani (comprising the Dagomba, Mamprusi and Nanumba), the Gurma (including the Konkomba), the Gurunsi, the Kusasi and the predominantly

pastoral Fulani (Table 1). While each group is distinct in language, customs and history, most are deeply integrated across and within communities, with intermarriage, shared livelihoods and social networks creating cohesive bonds. Despite this, some groups—such as the Fulani—retain distinct cultural and livelihood systems and continue to face exclusion or marginalization in various forms.

Languages — while distinct — are often mutually intelligible at a regional and local level, which contributes to communication and fosters a sense of unity across most ethnic groups. This linguistic fluidity enhances integration, allowing individuals to engage across group boundaries, particularly in communal activities like farming, trade and local governance. However, some minority communities maintain distinct linguistic and cultural traditions, which may require more targeted approaches to engagement and communication during project implementation.

Livelihood practices — primarily agriculture and livestock rearing — further reinforce this integration. Most ethnic groups engage in both activities, with few depending on a purely pastoral or agricultural lifestyle. There are, however, some groups that stand out for their predominantly pastoralist tradition — such as the Fulani. While many Fulani communities in Ghana have become increasingly integrated into the region's broader agricultural economy, participating in farming while maintaining their herding practices, they continue to prioritise pastoralism as the foundation of their livelihood and cultural identity. Despite these points of integration, Fulani communities often experience social and institutional marginalisation, particularly regarding access to land, basic services, and representation in local governances. Other minority communities with distinct cultural and livelihood systems may also face similar challenges, which will be further assessed during implementation.

The interplay between agriculture and pastoralism fosters interdependence, as farming communities often engage Fulani groups within their localities to support livestock management. This dynamic helps sustain cooperation between groups that have previously stood in opposition, with shared resource management and traditional conflict resolution mechanisms contributing to collaboration in the face of the region's harsh climate and resource limitations. These relationships of collaboration or opposition are also often spatially bound within Ghana. This can be at a district, sub-district or micro (local) level. For example, while relationships between sedentary farmers and pastoralists in the Northeast of the country have often been marked by conflict and opposition, such relationships in the Northwest are marked by collaboration and cooperation.

**Table 1.** Ghanaians by major ethnic group within the project regions, 2010<sup>2</sup>

<b>Ethnic Group</b>	<b>Northern</b>	<b>Upper East</b>	<b>Upper West</b>
Akan	3.1	2.3	1.4
Ga-Dangme	0.3	0.1	0.1
Ewe	1.7	0.3	0.4
Guan	8.6	0.3	0.8
Gurma	27.3	4.7	1.2
Mole-Dagbani	52.7	74.7	73.0
Gurunsi	3.7	8.6	20.6
Mande	0.5	5.6	0.3
Others (including the Fulani)	2.1	3.4	2.1

### **Livelihood practices and gender roles**

Agriculture is the backbone of most ethnic groups in northern Ghana and most communities practice small-scale subsistence agriculture, selling any excess produce either through farming co-operatives or on a sole basis at nearby markets. The Mole-Dagbani, for example, are known for cultivating staple crops such as maize, millet, yams and sorghum. These crops are integral to the food security of households, particularly during lean periods when food reserves from the previous season run low. Among these groups, crop production is a gendered activity. Men are typically responsible for clearing and ploughing the land, while women contribute to planting, weeding and harvesting. In recent years, women have also gained prominence in the cultivation of vegetables — which are often grown for both consumption and sale in local markets. In addition to crops, the Mole-Dagbani also engage in animal husbandry, rearing sheep, goats and poultry to complement their farming. These patterns reflect broader integrated agro-pastoral systems common to many groups in the region, though specific roles and vulnerabilities may differ across communities.

<sup>2</sup> Ghana Statistical Service. 2013. 2010 Population and Housing Census – National Analytical Report.



The Konkomba and Kusasi ethnic groups similarly rely on agriculture as their primary livelihood, although they tend to practice a more diversified form of farming — incorporating both cash crops and livestock. The Konkomba, for example, are known for their cultivation of groundnuts, which are sold to traders from larger cities. This commercial focus provides a necessary income source, particularly in a region where access to formal employment is limited. Livestock rearing — particularly of goats and cattle — also plays a notable role, contributing to household wealth and serving as a financial reserve in times of crisis. Women in Konkomba and Kusasi communities often take on roles in livestock care, including feeding and milking animals. The integration of livestock into farming systems allows for greater resilience, particularly in times of drought or market shocks. In these communities, livestock rearing is not only an economic activity but also part of social and cultural life, with cattle and small ruminants serving as dowries, gifts and symbols of wealth.

In contrast to the agricultural focus of other ethnic groups, the Fulani are traditionally pastoralists — known for their extensive herding of cattle, sheep and goats. Cattle hold a central place in Fulani culture, serving as both an economic asset and a symbol of social status. Historically, the Fulani have practiced transhumance — a form of semi-nomadic pastoralism where they migrate with their herds in search of grazing land and water. However, in northern Ghana, many Fulani communities have adopted a more sedentary lifestyle, integrating farming into their livelihoods alongside livestock rearing. This shift has been influenced by various factors including climate change — which has reduced the availability of grazing lands — and the need to access local markets and services. Despite this integration, Fulani communities remain distinct in their identity and livelihood systems, and continue to face barriers to land access, public services and political representation.

Despite this shift towards a more mixed livelihood, the Fulani remain unique in the region for their strong identification with pastoralism. While most other groups balance crop farming with livestock rearing, the Fulani prioritise livestock as the foundation of their economy. Cattle provide not only meat and milk but also serve as a store of wealth that can be sold or traded during times of need. This has made the Fulani highly mobile, as they must move their herds to find fresh pasture — particularly during the dry season. However, as pastoralism becomes less viable due to environmental degradation and climate change conditions — which include an increased droughts — some Fulani are increasingly engaging in small-scale farming, planting crops like maize and millet to supplement their livestock-based income.

The practice of pure pastoralism has become increasingly rare in northern Ghana, with most ethnic groups now practicing a mix of agriculture and livestock rearing. Even among the Fulani, many have adopted farming as a supplementary livelihood, reflecting the region's growing trend of integrated agro-pastoralism. This shift has been driven by multiple factors, including environmental changes such as droughts and overgrazing which have made it difficult for pastoralists to rely solely on livestock. For many Fulani, the cultivation of crops like millet, maize and sorghum now provides a fallback during times when grazing lands are scarce or when livestock production is insufficient to meet household needs. This transition reflects broader environmental and socio-economic pressures, including recurring droughts, reduced access to grazing lands and the degradation of traditional pastoral routes. These shifts have increased livelihood vulnerability among pastoralist communities, particularly those with limited land tenure security or access to alternative income sources. Other ethnic minority communities in the region may also face similar risks, and their specific circumstances will be assessed further during project implementation.

### **Land ownership and access**

Land ownership in northern Ghana is predominantly governed by customary systems, which are overseen by traditional authorities like chiefs and family heads. In most ethnic groups, land is communally owned and individual households are allocated plots for farming by these traditional leaders. The Mole-Dagbani and Konkomba communities, for instance, operate within a system where land rights are passed down through families — typically along patrilineal lines. Men generally have primary access to land, though women may receive plots from their husbands or fathers for farming. Women's farms tend to be smaller but are often more intensively cultivated, with women focusing on crops — such as groundnuts, vegetables and shea nuts — which are necessary for household nutrition and income generation.

The Fulani, however, face distinct challenges when it comes to land access and security of tenure. Traditionally, as nomadic pastoralists, the Fulani did not need permanent access to land — as their



livelihood relied on the free movement of livestock across vast grazing areas. In contemporary Ghana, this mobility has been constrained by environmental degradation and growing competition for land and the Fulani must often negotiate access to grazing lands with local chiefs or communities. This can lead to tensions, particularly during growing or 'wet' seasons when agricultural land is prioritised for crop farming and municipal bylaws may restrict the free movement of livestock across the landscape. For the Fulani, access to water sources and pasture is necessary for their herds and conflicts may arise when livestock encroach on farmers' crops — contravening local laws and causing economic losses. These challenges are compounded by the fact that many Fulani communities lack formal land tenure security and are underrepresented in local decision-making processes

Other minority communities may also experience barriers to secure land access or recognition under customary systems. Their specific situations will be assessed during implementation to determine whether additional measures are required to protect their rights and ensure equitable participation in project activities.

### **Cooperation and Tensions Between Farming and Pastoralist Communities**

Despite the interdependence between pastoralism and agriculture, tensions between Fulani pastoralists and farming communities are a potential issue in northern Ghana. Conflicts can arise when Fulani cattle graze on farmlands, leading to crop destruction. These conflicts are typically resolved at the local level through traditional mechanisms, with chiefs or elders mediating between the parties. In cases where these efforts fail, disputes may be referred to district-level authorities or the District Security Council. The recurrence of such disputes—especially in areas with weak dispute resolution mechanisms or unclear grazing arrangements—represents a potential risk to the inclusion and well-being of Fulani communities.

However, alongside these tensions, there are also numerous examples of cooperation and mutual benefit between Fulani pastoralists and farming communities. In many areas, farmers rely on Fulani cattle to provide manure for their fields — which enhances soil fertility and improves crop yields. In exchange, Fulani pastoralists benefit from access to agricultural by-products — such as crop residues — which serve as supplementary feed for their livestock. This symbiotic relationship underscores the economic interdependence between farming and herding in northern Ghana, where both activities are necessary for sustaining livelihoods in a challenging environment. These dynamics vary by location and will require site-specific analysis during implementation to ensure culturally appropriate engagement and conflict-sensitive project planning.

### **Social structures and gender dynamics**

Across northern Ghana, traditional social structures play a considerable role in shaping land access, labour distribution and gender dynamics within ethnic groups. Among the Mole-Dagbani, Konkomba and Kusasi, men typically control land ownership while women gain access through their marital or familial connections. However, women's roles in agriculture are substantial, particularly in post-harvest activities — such as processing shea nuts and groundnuts — which provide income for many households. Women's contributions to farming and livestock management are also necessary for household food security. Despite their central role in rural livelihoods, women in these communities often face structural barriers to land ownership, decision-making, and access to productive resources.

In Fulani communities, gender roles are similarly distinct. Men are primarily responsible for managing cattle — which is central to the Fulani economy — while women contribute to livestock care and household tasks. As more Fulani have settled into farming, women have taken on greater roles in crop cultivation — particularly in the management of home gardens and small-scale farming plots. However, Fulani women may face additional layers of exclusion due to both gender and ethnic identity, including limited access to services, representation, and livelihood support programmes. These shifts reflect broader changes in gender roles across the region, as women increasingly engage in both farming and income-generating activities. During implementation, gender-sensitive engagement strategies will be required to ensure the meaningful participation of women from all Indigenous and ethnic minority communities, including those who are most marginalised.

## ***3.4 Potential Risks to Indigenous Peoples by Project Activity***

While the project is designed to deliver inclusive climate adaptation benefits, several activities present potential risks to Indigenous Peoples in northern Ghana, particularly in relation to land access,

participation, and equitable benefit-sharing. These risks vary across components and are summarised below in alignment with UNEP's Safeguard Standard SS7 on Indigenous Peoples.

#### **Output 1: Improved climate data and early warnings**

- Activity 1.1, 1.3, 1.4, 1.5: There is a low risk that Indigenous communities may be excluded from the design or use of early warning systems, climate data platforms, or national planning processes due to language, remoteness, or limited access to digital or technical systems. This may result in inequitable access to life-saving information or support services.
- Activity 1.2: Installation of climate infrastructure (e.g. AWS, ground-water monitoring) carries a moderate risk if infrastructure is sited on land used or claimed by Indigenous Peoples, particularly pastoralist or transhumant groups. Risks relate to potential restriction of access, unrecognised land claims, or reduced mobility. These risks require Free, Prior and Informed Consent (FPIC) before installation on such lands.

#### **Output 2: Climate-resilient agriculture**

- Activities 2.1, 2.2: There is a risk that Indigenous Peoples, particularly pastoralist or mobile groups, may be excluded from the development of Community Climate Action Plans (CCAPs) or training programmes if engagement is not tailored to their mobility patterns, governance systems, or cultural practices. Inadequate participation could result in exclusion from adaptation planning and reduced access to project benefits.
- Activity 2.3: The implementation of land-based interventions (e.g. demonstration sites, EbA measures, alternative livelihoods) presents moderate risks where communal or traditionally used lands are affected. If such interventions promote sedentary land use (e.g. agroforestry, fencing) without adequate consultation, they may displace or marginalise pastoralist groups. FPIC is required for any activity implemented on land used or claimed by Indigenous Peoples.

#### **Output 3: Landscape restoration to reduce drought and flood risk**

- All interventions: Nature-based interventions (e.g. riparian restoration, agroforestry, fire management and fodder banks) may result in changes to land use patterns that affect traditional access to grazing land or other natural resources. These risks are moderate where Indigenous Peoples rely on shared or communal landscapes for seasonal use or mobility. FPIC will be required where restoration activities (or activities such as the establishment of fodder banks) are sited on land used or claimed by Indigenous Peoples.

#### **Output 4: Access to finance and private sector engagement**

- All activities (4.1–4.3): There is a low risk that Indigenous communities may be excluded from access to financial services, farmer-based organisations (FBOs), or extension support, particularly where formal membership or literacy requirements are not adapted to local contexts. Outreach strategies and financial training must be tailored to ensure inclusion of Indigenous Peoples.

#### **Output 5: Knowledge and awareness**

- Activities 5.1–5.3: Risks are minimal but include potential exclusion from awareness events or knowledge dissemination processes if materials or formats are not accessible or culturally appropriate. Communication and training materials should be adapted to ensure that Indigenous Peoples can participate meaningfully and that their perspectives are respectfully included.

### **4. Legal and institutional framework applicable to Indigenous Peoples**

#### **4.1 National legislation**

Ghana's legal framework does not formally recognise any specific group as "Indigenous Peoples" in the sense used in international discourse or in accordance with definitions as included in the Green Climate Fund's (GCF's) Indigenous Peoples Policy. However, this IPPF recognises that certain ethnic minority communities in Ghana—such as the Fulani pastoralists—meet the criteria of Indigenous Peoples for the purposes of safeguards compliance. The country does have a well-developed legal and policy framework that protects the rights of all citizens, including communities that could be considered Indigenous under international interpretations. These laws and policies promote equality, non-discrimination and cultural preservation, though challenges remain in their application — particularly for

marginalised or indigenous groups in rural and underserved areas. The following national legislation is relevant to the rights, well-being and inclusion of communities that fall within the scope of this IPPF.

### **The 1992 Constitution of Ghana**

The Constitution guarantees equality before the law (Article 17) and prohibits discrimination based on ethnicity, gender or religion. It mandates the state to eliminate social and cultural inequalities and protect minority rights. In practice, this framework has contributed substantially to addressing disparities among ethnic minorities, particularly in northern Ghana where groups like the Dagomba, Gonja and Mamprusi reside. Efforts to bridge socio-economic gaps through initiatives like the Savannah Accelerated Development Authority (SADA) and the Northern Development Authority (NDA) have seen mixed results. While these programmes have improved infrastructure and services, marginalised communities like the Fulani pastoralists still face systemic discrimination — particularly in land rights and access to social services.

### **Chieftaincy Act (2008)**

The Chieftaincy Act recognises the role of traditional authorities, safeguarding the cultural and traditional practices of various ethnic communities. In regions such as the Northern, Upper East and Upper West Regions, this has empowered ethnic minorities by giving them a strong voice in local governance. Traditional leaders help manage land, mediate disputes and preserve cultural practices. However, chieftaincy conflicts — such as those in Bawku — sometimes exacerbate ethnic tensions, undermining the rights and well-being of minority groups and Indigenous Peoples. These disputes can strain relations between different ethnic communities, affecting the broader application of minority protections.

### **Local Governance Act (2016)**

Ghana's decentralisation process — under the Local Governance Act — has enhanced the representation of ethnic minorities in governance, but such benefits are not extended equally across all groups. District Assemblies provide a platform for local communities — including minority groups — to participate in decision-making processes. In the north, ethnic groups like the Mamprusi and Dagomba have benefited from this, but mobile pastoralist groups like the Fulani often find it challenging to engage with formal governance structures. As a result, their concerns — particularly related to land access and resource management — are often underrepresented in local governance.

### **The National Commission for Civic Education Act (1993)**

The National Commission for Civic Education (NCCE) plays a key role in promoting public awareness of constitutional rights, including those of ethnic minorities. In regions with recurring social conflicts — particularly in northern Ghana — the NCCE has been instrumental in promoting peacebuilding and fostering understanding between different social groups. However, despite these efforts, the deep-seated ethnic divisions in some regions — especially those rooted in land and chieftaincy disputes — remain difficult to overcome.

### **The Right to Information Act (2019)**

The Right to Information Act provides all citizens — including traditionally marginalised groups — with access to government-held information, fostering transparency and accountability. Some ethnic minorities have used this law to advocate for transparency in land management, resource allocation and development initiatives. Nonetheless, practical challenges remain, especially in rural areas where literacy levels are lower and access to information is more limited. This continues to hinder the full participation of some communities, such as the Fulani, in governance and decision-making.

### **The Cultural Policy of Ghana (2004)**

The Cultural Policy promotes the preservation of the cultural heritage of all ethnic groups, ensuring that their languages, festivals and traditions are recognised and celebrated. Ethnic groups such as the Ashanti, Ewe and Dagomba benefit from state-supported cultural programmes that safeguard their heritage. However, certain minority groups — like the Fulani — often struggle for similar recognition of their cultural practices, partly due to social marginalisation and discrimination. Their nomadic lifestyle further complicates their integration into national cultural frameworks.

### **Education Act (2008)**

Ghana's Education Act aims to promote inclusive education, ensuring equal access to learning opportunities for all ethnic groups — including minorities and Indigenous Groups. Programmes like the

Ghana School Feeding Programme have improved access to education in the Northern, Upper East and Upper West Regions — areas with substantial ethnic minority populations. However, challenges persist for children from marginalised groups, particularly pastoralist communities like the Fulani. Barriers such as inadequate infrastructure, long distances to schools and economic pressures (such as child labour) continue to limit educational attainment among these groups.

#### **The Northern Development Authority Act (2017)**

The Northern Development Authority (NDA) was established to address poverty and promote development in northern Ghana — where many minority groups reside. While the NDA has made progress in improving infrastructure and service delivery, its impact has been constrained by underfunding and coordination challenges. Minority communities in these regions, and the Fulani in particular, face higher poverty rates and limited access to essential services, reflecting ongoing disparities in development outcomes compared to other parts of the country.

#### **The Affirmative Action Bill (Draft)**

Though not yet passed into law, the Affirmative Action Bill aims to promote equal representation of marginalised groups — including minority groups and women — in governance and decision-making positions. Advocacy for the bill has highlighted the need to increase the participation of ethnic minorities in public life. However, delays in passing the bill have slowed progress toward achieving this goal, leaving representation gaps in many rural and underserved communities.

#### **Land rights and customary land tenure systems**

Although not codified at a national level, customary land tenure systems are a fundamental aspect of land governance in Ghana — particularly for rural ethnic communities. Traditional authorities manage land allocation and dispute resolution, which benefits many ethnic minorities in the north. However, Indigenous Peoples, including mobile and marginalised communities — such as the Fulani pastoralists — face considerable challenges in securing land rights. Farmer-pastoralist conflicts over land and grazing resources have become more frequent, leading to tensions and violence. These conflicts highlight the limitations of the current land tenure systems in accommodating the needs of all ethnic groups, particularly those with mobile lifestyles.

While Ghana's legal framework offers protections for all citizens — including Indigenous Peoples as defined under this framework — the practical implementation of these laws can face challenges. Ethnic minorities in northern Ghana — such as the Dagomba, Gonja and Mamprusi — benefit from strong traditional governance systems and state-supported cultural preservation efforts. However, marginalised communities such as the Fulani pastoralists can face limited — albeit systemic — discrimination, particularly in areas such as land rights, access to social services and education.

Government programs and policies aimed at reducing regional inequalities have had some success, particularly through decentralisation and development projects in the north. Nevertheless, potential for ethnic tensions and disparities persist — particularly in regions with historical conflicts over land and chieftaincy. The government's ongoing efforts to address these challenges, needs to be further strengthened to fully implement the legal protections and development initiatives that can improve conditions for Indigenous Peoples and marginalised communities across the country.

### ***4.2 International agreements***

Ghana is a signatory to several key international agreements that uphold human rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. These agreements encompass principles of equality, non-discrimination and the protection of fundamental rights for all individuals — including Indigenous Peoples. Ghana is also a party to the Paris Agreement, which highlights the importance of respecting human rights — including those of Indigenous Peoples — and emphasises their role in climate action through traditional knowledge<sup>3</sup> and forest conservation efforts. The agreement includes safeguards to protect the rights of Indigenous Peoples and local communities,

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<sup>3</sup> The project seeks to leverage the traditional knowledge of local farmers, rather than Indigenous Peoples' knowledge. Should Indigenous Knowledge be identified for use during implementation, any uptake would be managed through the IPP and would ensure both FPIC and appropriate mechanisms are in place.

particularly through mechanisms like REDD+ which aim to address deforestation and promote sustainable development. These international agreements are important reference points for the implementation of this IPPF, particularly in the absence of formal national recognition of Indigenous Peoples.

Additionally, while Ghana is not a party to the International Labour Organization Convention 169 on Indigenous and Tribal Peoples, it has made considerable commitments to eliminating racial discrimination and promoting equality through its participation in the Convention on the Elimination of All Forms of Racial Discrimination. Similarly Ghana is a party to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), further reflecting its acceptance of the protection of Indigenous rights within its national and international policy frameworks.

#### **4.3 Institutional framework**

The proposed project will be implemented in the context of the environmental and social frameworks of the GCF and the United Nations Environment Programme (UNEP). This will include adhering to UNEP's Environmental and Social Sustainability Framework (ESSF), which provides comprehensive guidelines to ensure that the project's activities are environmentally responsible, socially inclusive and respectful of human rights — with a specific standard dedicated to safeguarding the rights of Indigenous Peoples (Standard 5). Additionally, the project will align with the GCF's safeguards standards, encompassing the GCF Environmental and Social Policy and the GCF Indigenous Peoples Policy. The alignment of this framework with relevant policies is further expounded below.

The GCF acknowledges the unique circumstances that expose Indigenous Peoples to diverse risks and impacts arising from development projects and extends the definition of Indigenous People to broadly encompass groups that are marginalised and claim Indigenous heritage, regardless of their official recognition as Indigenous Peoples. Recognising the importance of inclusive participation and the establishment of partnerships, the GCF Indigenous Peoples Policy underscores the necessity of obtaining Free, Prior and Informed Consent (FPIC). This policy is aligned with international standards, particularly the UN Declaration on the Rights of Indigenous Peoples. It emphasises the imperative to consider the distinctive cultural heritage and traditional knowledge of Indigenous Peoples while implementing climate change projects. Furthermore, the GCF commits to the development and implementation of safeguards to prevent any adverse effects on the rights, livelihoods and well-being of these communities.

This Framework complies with paragraphs 1 and 2 of the GCF Indigenous Peoples Policy:

*"1. [...] The rights of Indigenous Peoples are affirmed by international human rights instruments, including binding treaties and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Indigenous Peoples have invaluable and critical contributions to make to climate change mitigation and adaptation. Yet they are also facing serious threats to the realization of their rights from climate change actions.*

*2. The importance of engaging with Indigenous Peoples in climate change policies and actions has been recognized by the Conference of the Parties (COP) to the United Nations Framework Convention on Climate Change (UNFCCC), including in the Cancun Agreement (decision 1/CP.16). The preamble of the Paris Agreement also acknowledges that Parties should, when taking action to address climate change, respect, promote and consider their respective obligations on, inter alia, the rights of Indigenous People. The COP decision adopting the Paris Agreement (decision 1/CP.21) recognized the need to strengthen practices and efforts of local communities and Indigenous Peoples related to addressing and responding to climate change and operationalized the local communities and Indigenous Peoples' platform to help do this."*

As the Accredited Entity implementing the project, UNEP operates under similar principles and has a distinct and specific standard — SS5 — which pertains to Indigenous Peoples and which automatically requires FPIC consultations to be undertaken if triggered. This is to ensure that the needs of Indigenous Peoples within the project footprint are considered in an appropriate manner. Given that the project will be implemented in an area where Indigenous Peoples are generally present and may be impacted by the project, this IPPF will ensure that these groups are identified and engaged via an FPIC approach as per both the requirements of the GCF and UNEP Environmental and Social Standards.

## 5. Screening, mapping, participation and consultation process during implementation of IPPF

UNEP's SS5 requires that where a project may affect the rights, lands, resources or territories of Indigenous Peoples, the project implements FPIC procedures and that the outcomes of those procedures be incorporated into the project design. This aligns with GCF's requirements and necessitates the development of a framework or plan to guide this process.

Activities that may negatively affect the human rights, lands, natural resources, territories and traditional livelihoods of Indigenous Peoples will not be implemented without the adoption of a sound risk management framework consistent with the mitigation hierarchy approach and securing free, prior and informed consent as this will contravene the standards of both UNEP and the GCF.

The Project Executing Entities (i.e., the EPA and MOFA) will undertake the following screening, participation and consultation process to ensure the rights and interests of all Indigenous Peoples identified in this IPPF and through any subsequent assessments, in the project area and its vicinities. This process will be scheduled to align with the implementation of relevant activities, with a requirement to ensure appropriate screening is completed prior to the outset of any interventions that may affect or include groups considered Indigenous Peoples under this framework, including transhumant groups such as the Fulani. Activities 1 – 3 as described below will need to be undertaken during the project inception phase, with the stakeholder engagement strategy and finalised reports informing the final activity design for each prioritised community as well as any further details informing stakeholder engagement throughout the project implementation period:

### During the project Inception Phase

1. **Screen the project sites and the greater vicinity of the project footprint to identify the different sedentary and transhumant groups or other Indigenous Peoples that may be traditionally excluded from the type of support being implemented under Output 3**, as per the definition of Indigenous Peoples included in the GCF Policy on Indigenous Peoples<sup>4</sup> and the criteria listed in the introduction to the IPPF. This will be undertaken by a national consultant or local NGO with working knowledge of FPIC principles with support provided by the EPA who have the required resources, on the ground presence and established networks in each project district.
2. **Undertake consultations with the identified groups of Indigenous Peoples through an FPIC modality, to engage identified communities and communicate project information in local languages and through methods that are culturally appropriate. In the framework of those consultations, develop a meaningful consultation strategy that is coherent with the FPIC principles.** This consultation will be the framework to elaborate any required subsequent plan, such as an Indigenous Peoples Plan (IPP), which will identify the relationship between the identified minority groups and the intended project beneficiaries, as well as their presence and livelihood activities within the project footprint and in the context of the proposed project activities. (This applies to all activities, but specifically activities under Output 3, which have the potential to result in differential benefits or contribute to exclusionary social and economic pressures). An outline of the structure of this IPP is provided as Appendix 1.
3. As part of the screening and consultation process, **ensure that customary and traditional land use, access and occupation patterns are identified and mapped, particularly in relation to pastoralist groups such as the Fulani.** This includes seasonal grazing areas, migration corridors, water points and other areas of cultural or livelihood significance. These patterns will be documented through community-led consultations and participatory mapping, even where such use is not legally formalised or registered. Where project activities may affect these areas—particularly in ways that could result in restrictions to access or economic displacement—the project will apply the mitigation hierarchy and ensure that FPIC is secured before any such activity proceeds. Any residual impacts will be addressed in line with UNEP SS7 and the GCF Indigenous Peoples Policy, including through negotiated agreements, benefit-sharing mechanisms or other context-appropriate mitigation measures.

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<sup>4</sup> Available here: <https://www.greenclimate.fund/document/indigenous-peoples-policy#:~:text=Adopted%20by%20decision%20B..climate%20change%20mitigation%20and%20adaptation.>

4. **Make sure that the IPP creates mechanisms to ensure that Indigenous Peoples have fair access and the opportunity for representation in the decision-making bodies associated with activities that may affect them.** Acknowledging that some consulted communities may choose not to participate in project structures it is necessary to make sure that the FPIC is obtained for activities that may result in temporary restrictions for access to land and natural resources and activities that may change official land-use management plans or strategies.
5. Ensure that participation of Indigenous Peoples is gender inclusive, culturally appropriate and tailored to their specific needs, while acknowledging that their rights to self-determination may include a desire to abstain from engagement with the project or other project structures.
6. **Identify and assess the risks involved for Indigenous Peoples in the project, in the context of a meaningful consultation.** In any instance in which project activities are identified to have a risk of generating conflict or competition, an attempt should be made to find measures that build collaborative structures between sedentary and nomadic (or semi-nomadic) peoples through formalised structures or other customary or traditional means.
7. **In the framework of a meaningful consultation, together with the Indigenous Peoples that are directly or indirectly affected by the project, including through exclusion, develop an IPP to safeguard the rights of Indigenous Peoples throughout the project implementation** based on the outcomes of the initial screening and engagement. Such plans should additionally be developed in the context of the proposed project activities, considering the potential impacts of all activities on the identified groups. Where appropriate, the IPP should also identify opportunities to incorporate Indigenous knowledge, practices, and perspectives—particularly in relation to climate adaptation, land use, and sustainable resource management—as part of the co-development of demonstration sites and training activities.
8. Appoint a dedicated project staff member within each project district to be responsible for liaison with these specific communities to ensure continuity and promote community participation and consultation.
9. Consult with the identified communities on an appropriate structure for a Grievance Redress Mechanism (GRM) that: i) leverages existing traditional conflict resolution mechanisms and respects traditional authorities; and ii) **develop linkages to ensure the project's primary GRM is accessible by the identified groups and that redressal processes are undertaken in an equitable and culturally sensitive manner.**

#### Throughout Project Implementation

**Ongoing consultations throughout the project implementation period will ensure support for all interventions that may affect identified communities via FPIC prior to the implementation of said activities.** (This applies specifically to Output 3 as well as to all stakeholder engagements with groups that may self-identify or have institutionalised identities as Indigenous Peoples)

#### *5.1 Results of participatory consultation*

Through the implementation of the process described above, the following outcomes are expected

1. Indigenous Peoples affected by the project directly or indirectly are identified and engaged in the project via FPIC, thereby **ensuring that their consent is given for every activity that will impact them during project finalisation and throughout implementation.**
2. All Indigenous Peoples within the project footprint feel included in the project engagement. This both aligns with the principles that underpin the GCF and UNEP standards and will further contribute to improved project outcomes, particularly regarding the sustainable management of rangelands.
3. Indigenous Peoples Plans are developed to guide ongoing engagement throughout the project implementation period, enabling potentially affected Indigenous Peoples fair access and opportunity to participate in decisions that may affect them and their livelihoods.



## 6. Free Prior and Informed Consent Framework

The process described under the IPPF will ensure — in a participatory manner — ensure that Indigenous Peoples are identified and engaged with to inform the design of the IPP as the framework to guide all subsequent consultations and ensure affected Indigenous Peoples are engaged throughout the decision-making process, facilitating effective participation, based on a sound information exchange during the development the activities listed in Section 2 of this IPPF.

The project will identify the presence of these peoples at each of the project sites and their vicinities and further establish, together with Indigenous Peoples involved, the nature of the risk(s), including any gender-related issues. Where the potential for such impacts is confirmed, an Indigenous Peoples Plan (outline available in Appendix 1) will be developed by an independent expert through a participatory manner with the potentially affected communities. As required under SS 5 of the of the ESSF, this will include a plan for culturally appropriate consultation with the objective of achieving agreement in compliance with the Free Prior and Informed Consent (FPIC) procedures. If the potential adverse impacts involved in specific activities include loss of access to resources or restrictions on land use, the FPIC needs to be secured and specific guidance in paragraph 59 of the GCF IP Policy would need to be followed. These processes will include: i) Minimising land impacts on traditional ownerships; ii) Reducing impacts on natural resources under traditional use; iii) Reviewing tenure arrangements before land acquisitions; iv) Assessing Indigenous land use inclusively; v) Informing Indigenous Peoples of rights and project impacts; vi) Providing fair compensation and development opportunities for commercial activities on Indigenous lands. Some activities of the project have been identified as required to secure the FPIC (see Section on the main purpose of the Indigenous Peoples Engagement Framework in this document).

The IPP will describe how Indigenous Peoples will be involved at all activities listed in Section 2 of this IPPF — including unlisted sub-activities (these sub-activity descriptions are available in the ESMF and in greater detail in the Funding Proposal). As specific sites and activity details are confirmed, further FPIC discussions will take place at grassroots level with affected communities. Should there be any difficulties in securing FPIC, adaptive management will be applied, for example, through additional Indigenous Peoples consultations, modification of approaches, diversification of the livelihood systems, or additional actions as determined through meaningful consultations with potentially affected communities.

No activities that may affect the rights, customs, lands, resources or territories of Indigenous Peoples will commence without their explicit free, prior and informed consent. Requirements of the **FPIC** process are described as follow.

**Free:** means the process will be self-directed by the collective landowners from whom consent is being sought, unencumbered by coercion, expectations or timelines that are externally imposed. The process:

- will be free from coercion, bias, conditions, bribery or rewards;
- will ensure that the decision-making structure is determined by stakeholders;
- will give information transparently and objectively;
- meetings and decisions will take place at locations and times and in language and formats determined by the stakeholders; and
- all community members will be free to participate regardless of gender, age or standing.

**Prior:** means that no project activity implementation takes place before a decision by the collective landowners, (or those who occupy land regardless of their legal right to tenure) and local communities has been made. The process will ensure that enough time is provided to collective landowners to understand, access and analyse information on the proposed activities.

**Informed:** Information shall be provided in a manner that is accessible, clear, consistent, accurate and transparent. It will be:

- delivered in appropriate language and format (including video, graphics, radios, documentaries and photos);
- given to the landowner communities about their rights as relevant to the project and possible impacts;

- objective, covering both the positive and negative potential of activities and consequences of giving or withholding consent;
- complete, covering the spectrum of potential social, financial, political, cultural, environmental impacts, including scientific information with access to original sources in appropriate language;
- delivered in a manner that strengthens and does not erode Indigenous or local cultures;

**Consent** is:

- made by the collective landowners through their collective decision-making process.
- a freely given decision that may be a “Yes” or a “No”, including the option to reconsider if conditions agreed upon are not met, there are changes in the proposed activities or if new information relevant to the proposed activities emerges;
- a collective decision determined by affected people in accordance with their forms of decision-making (for example, consensus and majority);
- based on full understanding of opportunities and risks associated with the proposed activity;
- given or withheld in phases, over specific periods of time for distinct stages or phases of the project.
- Made in a manner and form that is consistent with the cultural practices or structures of a group as defined by them.

## 7. Budget and financing

**Table 2.** IPPF and IPPF budget.

<b>Description</b>	<b>Indicative Budget</b>
<b>Implementing IPPF — including FPIC processes and preparation of IPP:</b>	
Contractual services, including IC or appropriately qualified NC to lead IPPF FPIC Consultations and the development of the IPP. This should include site level data collection and support with field visits and consultations as required. The IPPF will be completed in the first year of the project implementation and prior to any on-the-ground interventions that may affect Indigenous Peoples being implemented.	US\$25,000
Mission expenses: (Expectation for a minimum of two missions: First mission to undertake site visits, collect and corroborate data. Second mission to address gaps, validate design and secure endorsement at national and district levels and with Indigenous Peoples Representatives)	US\$21,500
<b>Sub-total:</b>	<b>US\$46,500</b>
<b>Implementation and Monitoring of IPP:</b>	
Staff Costs including National ESS Officer, Gender Specialist and M&E Officer and focal points in each district (in-kind co-finance)	N/A (included in staff costs)
IPP Implementation budget to cover travel, stakeholder engagement workshops, site visits and specialist support as required (\$12000 per year in yr. 2 – yr. 7)	US\$72,000
IPP Review to be undertaken in year 3 (as part of ESMF review and recommendations).	Included in ESMF budget
<b>Sub-total:</b>	<b>US\$72,000</b>
<b>Total</b>	<b>US\$118,500</b>

## Appendix 1: Recommended outline of Indigenous Peoples Plan

If the proposed project may affect directly or indirectly, in a positive or negative way Indigenous Peoples, including their rights, lands, territories or resources, an Indigenous Peoples Plan (IPP) needs to be elaborated and included in the project documentation. The IPP is to be elaborated and implemented in a manner consistent with the GCF's IP Policy and have a level of detail proportional to the complexity of the nature and scale of the proposed project and its potential impacts on Indigenous Peoples and their lands, resources and territories.

With the effective and meaningful participation of the affected peoples, the IPP shall be elaborated and contain provisions addressing, at a minimum, the substantive aspects of the following outline:

1. Executive summary: Concisely describes the relevant facts, findings and recommended actions
2. Description of the project: General description of the project, the project area and components/activities that may lead to impacts on Indigenous Peoples
3. Baseline description of Indigenous Peoples: A description of affected Indigenous People(s) and their locations, (from independent and participatory environmental and social risks and impacts assessment processes) including:
  - a. description of the community or communities constituting the affected peoples — for example, names, ethnicities, dialects and estimated numbers;
  - b. description of the lands, territories and resources to be affected and the affected peoples' connections/relationship with those lands, territories and resources; and
  - c. an identification of any Indigenous Peoples groups within the affected peoples — for example, uncontacted and voluntary isolated peoples, women and girls, persons with disabilities, elderly and others.
4. Summary of substantive rights and legal framework: A description of the substantive rights of Indigenous Peoples and the applicable international and national legal framework, including:
  - a. an analysis of applicable domestic laws and international frameworks affirming and protecting the rights of Indigenous Peoples — including a general assessment of government implementation of the same;
  - b. an analysis as to whether the project involves activities that are contingent on establishing legally recognised rights to lands, territories or resources that Indigenous Peoples have traditionally owned, occupied or otherwise used or acquired. Where such contingency exists, a description of the steps and timelines to achieve the legal recognition of such property rights in accordance with applicable law and obligations of the state directly applicable to the activities under relevant international treaties and agreements, customs, traditions and land tenure systems of the Indigenous Peoples; and
  - c. an analysis whether the project involves activities that are contingent on the recognition of the juridical personality of the affected Indigenous Peoples. Where such contingency exists, a description of the steps and timelines for achieving such recognition.
5. Summary of social and environmental assessment and mitigation measures
  - a. Baseline information (from independent and participatory environmental and social risks and impacts assessment processes)
  - b. A summary of the findings and recommendations of the required prior social and environmental impact studies (detailed in-depth studies are not expected but should be considered as applicable) and specifically in relation to Indigenous Peoples, their rights, livelihoods, lands, territories and resources. This should include the manner in which the affected Indigenous Peoples participated in such a study and their views on the consultation mechanisms, the findings and recommendations.
  - c. Where potential risks and adverse impacts to Indigenous Peoples, their lands, territories and resources, livelihoods and knowledge are identified, the AE will make sure to address such issues in the framework of the consultation process guided by FPIC that will be carried on all through the project cycle, where the measures to avoid, minimise, mitigate, or

compensate for these adverse effects are designed with them, including the details and associated timelines are consulted with Indigenous Peoples on the planned measures to avoid, minimise, mitigate, or compensate for these adverse effects.

- d. Relevant measures to promote and protect the rights and interests of the Indigenous Peoples will also be decided in a consultative process with them on an ongoing basis and should comply with the affected peoples' internal norms and customs when appropriate.
6. Community-based natural resource management plan
  - a. A community-based natural resource management plan to ensure sustainable management of resources, which will be co-developed with affected Indigenous Peoples to ensure continued access to the lands, resources or territories that they claim while contributing to the outcomes of the project.
  - b. A set of guidelines for engagements, negotiations and co-development of CCAP that adhere to FPIC and include strategies for supporting engagements with all project stakeholders to ensure that the rights of Indigenous Peoples are secured.
7. Participation, consultation and FPIC processes
  - a. A description of the methodology and process of consultations undertaken with Indigenous Peoples, including a record of all engagements, locations and participants and consultative outcomes. A timetable will be included indicating the distribution of responsibilities for each activity undertaken in the consultation.
  - b. A summary of results of the culturally appropriate consultation and, where required, FPIC processes undertaken with the affected peoples' which led to the Indigenous Peoples' support for the project.
  - c. A description of the mechanisms to conduct iterative consultation and consent processes throughout implementation of the project. Identify project activities and circumstances that shall require meaningful consultation and FPIC.
8. Gender assessment:
  - a) conduct an analysis of gender access and equity issues among Indigenous Peoples in and around the project areas;
  - b) scope the possible gender-related risks from the project among Indigenous Peoples in around the project areas; and
  - c) develop mitigation actions to address the risk and integrate this into the main Gender Action Plan, the ESMP and the Stakeholder Engagement Plan
9. Appropriate benefits: An identification of the measures to be taken to ensure that Indigenous Peoples receive equitable social and economic benefits that are culturally appropriate, including a description of the consultation and consent processes that lead to the determined benefit sharing arrangements.
10. Tenure arrangements: A description of the current tenure situation of Indigenous Peoples in the vicinity of the project as well as measures to be implemented to safeguard and secure these rights in any instance in which the project may impact the tenure or access of Indigenous Peoples to their historically or traditionally claimed land.
11. Capacity support: Description of the measures convened with Indigenous Peoples in the framework of a consultation, to support social, legal, technical capabilities of Indigenous Peoples' organisations in the project area — as required — to enable them to better represent the affected Indigenous Peoples more effectively. Where appropriate and requested by them, description of steps to support technical and legal capabilities of relevant government institutions to strengthen compliance with the country's duties and obligations under international law with respect to the rights of Indigenous Peoples.
12. Grievance Redress: through a meaningful consultation, a description of the procedures available to address grievances brought by the affected Indigenous Peoples arising from project implementation, including the remedies available, how the grievance mechanisms consider Indigenous Peoples' customary laws and dispute resolution processes, as well as the effective capacity of Indigenous Peoples under national laws to denounce violations and secure remedies

for the same in domestic courts and administrative processes. The grievance redress mechanism must adhere to the stipulations of the GCF IP Policy (Section 7.3)<sup>5</sup>

13. Institutional arrangements: A description of the schedule and institutional arrangement responsibilities and mechanisms for carrying out the measures contained in the IPP, including participatory mechanisms for affected Indigenous Peoples. A description of the role of independent, impartial experts to validate, audit and/or conduct oversight of the project.
14. Monitoring, reporting and evaluation: A description of the monitoring framework for the project and key indicators for measuring progress and compliance of requirements and commitments. Include mechanisms and benchmarks appropriate to the project for transparent, participatory joint monitoring, evaluating and reporting — including a description of how the affected Indigenous Peoples are involved. Indicate process for participatory review of IPP implementation and any necessary modifications or corrective actions (including where necessary consent processes).
15. Budget and financing: An appropriately costed plan, with itemised budget sufficient to satisfactorily undertake the activities described.

**Note:** The IPP will be developed and prepared during inception and prior to implementation of the project. In no case shall project activities that may adversely affect Indigenous Peoples take place before the IPP is implemented. Any such activities (i.e., those that may affect Indigenous groups) should be clearly identified. Where other project documents already develop and address issues listed in the above sections, citation to the relevant document(s) shall suffice.

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<sup>5</sup> Please refer to the GCF IP Policy (Section 7.3): Available here: <https://www.greenclimate.fund/document/indigenous-peoples-policy>