The African CSOs Biodiversity Alliance (ACBA) and the African Wildlife Foundation (AWF) welcome the Convention on Biological Diversity's decision 15/7 on Resource Mobilization, which requested the Global Environment Facility (GEF) to establish a special trust fund to support the implementation of the Kunming-Montreal Global Biodiversity Framework (KMGBF), to complement existing support and scale up financing to ensure its timely implementation, considering the need for adequacy, predictability, and timely flow of funds.

We further welcome the 64th Global Environmental Fund (GEF) Council decision on document GEF/C.64/05/Rev.01 providing progressive programming directions for the Global Biodiversity Framework Fund, hereafter referred to as GBFF.

The ratification and launch of the GBF Fund at the GEF 7 Assembly in Vancouver is a significant milestone towards the implementation of the Global Biodiversity Framework targets.

For Africa, a region rich in biodiversity, the GBFF provides an excellent opportunity to increase biodiversity finance and ensure that finance is accessible, especially to local actors, who while they continue to play a crucial role in conservation, receive inadequate resources to advance work that compliments that of national governments and other conservation partners.

**We specifically commend the following elements of the trust fund directions:**

- Emphasis that the GBFF will be country driven, funding programs and projects which are based on national priorities as articulated in National Biodiversity Strategies and Action Plans (NBSAPs)
- The provisions for about 20% of funds to reach Indigenous Peoples and Local Communities (IPLCs)
- The focus on Small Island Developing States (SIDs) and Least Developed countries (LDCs), with the recommendation that 36% + 3% of resources be allocated to them. Noting that the 3% portion to SIDS and LDCs will be reviewed after 3 years of the date of the Fund ratification at the Assembly. If unused, the 3% will be reprogrammed to other countries.
- Efforts to reduce the administrative burden of applying for and receiving funds by proposing the one-step project approval process
- Acknowledgement on the importance of target 22 (on inclusive and equitable engagement of IPLCs, Women, Youth, People living with disabilities and other vulnerable groups) and that it must be reflected in program design and implementation for all projects to be funded by the GBFF.

**The following however can be strengthened in designing the GBFF:**

- **IPLCs:** While there is encouraging guidance and commitment for IPLCs to receive resources to contribute to the implementation, we equally note that the role of IPLCs is effectively limited to the 20% of the program portfolio, with state actors and implementing agencies still wielding significant control and influence over the process. In addition to at least a 20%
share, IPLCs should be integral in defining priorities and designing the overall country portfolio. This way, investments from the broad country portfolio will respond to IPLCs' needs in a more targeted, cohesive, and comprehensive manner. Furthermore, to increase the likelihood of local actors accessing funds, more work is required at a national level to strengthen and amplify processes that allow governments to partner with local CSOs and IPLCs. Explicit language is needed regarding how these resources will reach the local level.

- **Strengthening Safeguards:** Existing standard safeguards across the GEF provide a good basis to help avoid violation of people’s rights. However, these standards do not definitively require Free Prior and Informed Consent for projects affecting indigenous people and local communities. To be consistent with the requirements of the GBF targets on recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories, the GBF Fund should adopt and apply the principle of Free Prior and Informed Consent for projects involving and affecting indigenous people and local communities.

- **Megadiverse countries and Biodiversity Hotspots:** While we welcome the focus on LDCs and SIDS, countries with biodiversity hotspots which represent a significant percentage of the ‘world’s biodiversity, should be prioritized to receive funding. Countries with biodiversity hotspots have an increased responsibility to protect these natural assets to the benefit of the global community.

- **Youth Empowerment:** While IPLCs have been included as custodians, they are not a homogenous group. They include youth, women and other subgroups hence greater attention is needed to ensure all these subgroups are equally engaged, primarily urban and rural youth who make up a significant proportion of the global population. As rural youth have special circumstances and many are disadvantaged, they deserve special attention. GEF Secretariat should equally commit to monitoring and tracking the level of funding allocated to these sub-groups.

- **Executing agency:** Most of GEF funding is channeled through international NGOs and multilateral agencies that act as intermediaries. These agencies tend to have high costs and bureaucracy thereby reducing the funds available for biodiversity conservation, especially by frontline communities that include CSOs, IPLCs and urban and rural poor. The GBF Fund should prioritize partnerships that enhance the capacities of frontline communities, learning, and efficiencies. This would be more cost-effective and empower national actors and frontline communities to sustainably use and conserve biodiversity. Funding channeled through intermediaries must have delegated resources to strengthen local actors' institutional capacity to manage funds and monitor and report.

- **Operational Effectiveness:** In line with ensuring that the GBFF programs and projects should be based on national and local priorities, the GEF secretariat must mobilize and support countries to develop strategies and finance plans while ensuring the participation of local stakeholders. The GEF Secretariat should commit to improve accessibility and the timely flow of funds through additional capacity to facilitation of the project cycle and validation system.