

Brazilian Biodiversity Fund (FUNBIO)

FUNBIO Grievance System (GS)

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*FUNBIO is a not-for-profit civil association established in 1996 to support biodiversity conservation and the sustainable use of natural resources in Brazil. It operates in alignment with the Convention on Biological Diversity (CBD) and Brazil's National Biodiversity Program (PRONABIO), and has supported more than 410 projects across all Brazilian biomes. As an Implementing Agency of the Global Environment Facility (GEF), FUNBIO has established a **Grievance System (GS)** to manage complaints and conflicts related to the socio-environmental safeguards of its projects.¹*

STANDARDS AND SAFEGUARDS

FUNBIO's **Environmental and Social Safeguards Policy (ESSP)**,² updated in 2018, is aligned with the **International Finance Corporation (IFC) Performance Standards (2012)**.³ These standards address key areas such as environmental and social risk assessment, labor and working conditions, resource efficiency, community health and safety, land acquisition and involuntary resettlement, biodiversity conservation, Indigenous Peoples' rights, and cultural heritage protection. In some cases, FUNBIO may apply more stringent safeguards than those outlined by the IFC, particularly when national legislation or donor requirements establish higher standards.⁴

LAND TENURE

The IFC Performance Standards address land tenure primarily through **Performance Standard 5**, which covers both physical and economic displacement. Its central objective is to avoid or minimize displacement impacts wherever possible. The standard explicitly recognizes **customary and informal land rights**, including those held by individuals or communities without formal legal title. Projects are required to assess alternatives to displacement and to engage affected communities through **meaningful consultation** throughout the process.

In addition, **Performance Standard 7** affirms the **collective rights of Indigenous Peoples** to their ancestral lands and natural resources, regardless of whether such rights are formally recognized by national authorities. It obliges project proponents to avoid adverse impacts, respect both legal and customary rights, and obtain **Free, Prior, and Informed Consent (FPIC)** before undertaking activities

¹ FUNBIO. 2018. Policy for grievances made to the Brazilian biodiversity fund – FUNBIO. https://www.funbio.org.br/wp-content/uploads/2024/12/P-17-Politica-para-Reclamacoes_V5_ENG-1.pdf

² FUNBIO. 2020. Environmental and social safeguards policy. <https://www.funbio.org.br/wp-content/uploads/2017/05/File-4-P-24-ESS-Policy.2020.pdf>

³ FC. 2012: Performance Standards on Environmental and Social Sustainability. <https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standards-en.pdf>

⁴ Paragraph 21. FUNBIO. 2020. Environmental and social safeguards policy. <https://www.funbio.org.br/wp-content/uploads/2017/05/File-4-P-24-ESS-Policy.2020.pdf>

that could result in relocation or affect traditional territories and cultural heritage. As FUNBIO adheres to these standards, any violations—particularly those involving land tenure or Indigenous rights—constitute valid grounds for submitting a complaint through its Grievance Mechanism, which is free of charge to affected persons.

Violations involving land tenure—whether due to physical displacement or the loss of access to land and resources—require fair and prompt compensation at full replacement cost, irrespective of legal title. The standards also require the implementation of livelihood restoration measures to ensure that affected people are not left worse off, and ideally, experience improved living conditions. Additional remedies may include resettlement support, access to culturally appropriate housing or land, and provision of basic services necessary to reestablish a sustainable standard of living.

OUTREACH AND ADMISSIBILITY

While the **FUNBIO GS** is intended to be actively promoted—through the FUNBIO website, local stakeholder meetings, and other outreach channels—the information currently available online remains limited.^{5,6} Anyone who believes they have been adversely affected by FUNBIO’s operations or projects is entitled to submit a grievance. To facilitate a thorough and effective investigation, complaints should clearly present the facts of the case and, where possible, include supporting documentation. Although anonymous or incomplete submissions will still be reviewed, insufficient information may limit FUNBIO’s ability to assess or resolve the issue effectively.⁷

FUNBIO is committed to responding to all grievances submitted through its official channels, with the exception of spam or general inquiries unrelated to complaints, such as project proposals or job applications. The organization will not tolerate abusive behavior, repeated unfounded submissions, or any attempts to obstruct investigations. Such conduct may be referred to the **Ethics Committee** or appropriate legal authorities. In cases where individuals knowingly submit false or misleading information, FUNBIO reserves the right to pursue legal action if deemed necessary.⁸

FILING A COMPLAINT

Although FUNBIO’s grievance policy does not specify a formal escalation process, individuals affected by a project are encouraged to first seek resolution through project-level grievance mechanisms.⁹ These mechanisms are mandatory when FUNBIO operates as an Implementing Agency, such as for projects financed by the Global Environment Facility (GEF) or the Green Climate Fund (GCF).¹⁰ If the issue remains unresolved at the project level, it may be escalated to FUNBIO’s central Grievance System (GS) for further review and action.

⁵ Paragraph 54. FUNBIO. 2020. Environmental and social safeguards policy. <https://www.funbio.org.br/wp-content/uploads/2017/05/File-4-P-24-ESS-Policy.2020.pdf>

⁶ FUNBIO. n.d. Grievance Office. <https://www.funbio.org.br/en/grievance-office/>

⁷ Paragraphs 1; 32 and 33. FUNBIO. 2018. Policy for grievances made to the Brazilian biodiversity fund – FUNBIO. https://www.funbio.org.br/wp-content/uploads/2024/12/P-17-Politica-para-Reclamacoes_V5_ENG-1.pdf

⁸ Paragraphs 18 a and b) and 34 and 35. FUNBIO. 2018. Policy for grievances made to the Brazilian biodiversity fund – FUNBIO. https://www.funbio.org.br/wp-content/uploads/2024/12/P-17-Politica-para-Reclamacoes_V5_ENG-1.pdf

⁹ FUNBIO. 2018. Policy for grievances made to the Brazilian biodiversity fund – FUNBIO. https://www.funbio.org.br/wp-content/uploads/2024/12/P-17-Politica-para-Reclamacoes_V5_ENG-1.pdf

¹⁰ Paragraph 17. FUNBIO. 2018. Policy for grievances made to the Brazilian biodiversity fund – FUNBIO. https://www.funbio.org.br/wp-content/uploads/2024/12/P-17-Politica-para-Reclamacoes_V5_ENG-1.pdf

Upon receiving a grievance, FUNBIO will verify whether it has been submitted through the appropriate channel. If it has not, the complainant will be redirected to the correct contact point. FUNBIO aims to acknowledge receipt and initiate the verification process within approximately ten business days.