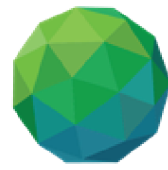


Redress



GREEN
CLIMATE
FUND

Independent
Redress
Mechanism

Independent Redress Mechanism

Grievances and Complaints

Extension of time for compliance review

GCF Project: FP039

Case [C-0009-Egypt](#)

Date 9 July 2025

IRM Extension of Time Decision – Compliance Review

GCF Project **FP039 – GCF-EBRD Egypt Renewable Energy Financing Framework**

Date **9 July 2025**

1. On 9 December 2022, the IRM declared eligible two complaints submitted to the IRM in relation to GCF funded project/programme FP039, "*GCF-EBRD Egypt Renewable Energy Financing Framework*".¹ The Accredited Entity for this programme is the European Bank for Reconstruction and Development (EBRD). The complainants (**Complainant #1** and **Complainant #2**) raised a number of issues that were broadly grouped into concerns related to (i) community development, and (ii) labour and working conditions, for the purposes of complaints handling processes.
2. At the conclusion of the initial steps, Complainant #1 and Complainant #2 both agreed to consider problem solving under the facilitation of the IRM.² The problem-solving phase commenced on 7 April 2023 and concluded on 20 April 2024. At the conclusion of the problem-solving phase, a Problem-Solving Agreement on community-development issues was reached with parties, including Complainant #1 and Complainant #2.³
3. Regarding the complaint on labour and working conditions brought forward by Complainant #2, parties were unable to reach an agreement and as a result, as of 27 April 2024, the IRM closed the problem-solving phase and referred Complainant #2's complaint to compliance review.⁴ The IRM conducted a compliance appraisal and on 12 July 2024 concluded in respect of those issues, there is *prima facie* evidence of adverse impacts and non-compliance with GCF operational policies and procedures by GCF Programme FP039.⁵ Accordingly, the IRM has commenced a compliance investigation in respect of Complainant #2's case.
4. Regarding the complaint on labour and working conditions brought forward by Complainant #1, the IRM initially reached a Problem-Solving Agreement and proceeded to the monitoring phase. In July 2024, during the monitoring phase, Complainant #1 communicated to the IRM that he wished to refer his labour-related issues in his complaint to compliance review. As a result, the IRM closed the problem-solving phase and referred Complainant #1's labour-related issues to compliance review, as of 14 July 2024. The IRM conducted a compliance appraisal and on 13 September 2024 concluded in respect of those issues, there is *prima facie* evidence of adverse impacts and non-compliance with GCF operational policies and procedures by GCF Programme FP039.⁶ Accordingly, the IRM has commenced a compliance investigation in respect of Complainant #1's case.

¹ Eligibility Determination can be found here: [C0009 Egypt | Independent Redress Mechanism | Green Climate Fund](#)

² The initial steps report is available at: <https://irm.greenclimate.fund/sites/default/files/case/initial-steps-report-c-0009-egypt-final-web.pdf>

³ Final Problem-Solving Conclusion Report – Community related matters: [Microsoft Word - IRM Case C0009 Final Problem Solving Conclusion Report \(Community Complaint\) web \(greenclimate.fund\)](#)

⁴ Final Problem-Solving Conclusion Report – Labour Complaints [Microsoft Word - IRM Case C0009 Final Problem Solving Conclusion Report \(Labour Complaints\) web \(002\) \(greenclimate.fund\)](#)

⁵ Compliance Appraisal Report – Labour Complaint (Complainant #2) [compliance-appraisal-report-c0009-egy-jul12.pdf \(greenclimate.fund\)](#)

⁶ Compliance Appraisal Report – Labour Complaint (Complainant #1) [irm-case-c0009-egy-compliance-appraisal-report-13sep2024.pdf \(greenclimate.fund\)](#)

5. In the interest of efficiency, the IRM consolidated the Scope of Compliance Investigations set out in the respective appraisal reports into a single compliance investigation which will address the facts asserted by Complainant #1 and Complainant #2 separately.
6. According to paragraph 62 of the IRM's Procedures and Guidelines (PGs),⁷ a compliance investigation should ordinarily be completed within one (1) year of the publication of the IRM's appraisal report on its website. Therefore, the consolidated Scope of Compliance Investigation maintained the completion date for the compliance investigation as 12 July 2025.
7. Due to the consolidation of the compliance investigation, a delay in conducting a fact-finding mission, and an unanticipated amount of documentation, the IRM requires an additional 55 calendar days to complete consultation (commencing in mid-July 2025) and finalize the compliance report.
8. Acting in terms of paragraph 95 of the PGs, the IRM has decided to extend the time limit for the conclusion of the compliance investigation phase from 12 July 2025 to 5 September 2025.

[Signed]

Preksha Krishna Kumar
Registrar and Case Officer
Independent Redress Mechanism
Green Climate Fund

Approved By:
Sonja Derkum
Head of Unit
Independent Redress Mechanism
Green Climate Fund

⁷ Available here: [2019 Procedures and Guidelines of the IRM | Independent Redress Mechanism | Green Climate Fund](#)