

Redress



GREEN
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Independent
Redress
Mechanism

Compliance Appraisal Report

Case C-0013 – Uganda

FP034: Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda

21 August 2026

ABOUT THE INDEPENDENT REDRESS MECHANISM

The Independent Redress Mechanism (IRM) is an accountability and redress mechanism established by the Green Climate Fund (GCF) to increase the effectiveness of the GCF's operations, and to be responsive to the concerns of people adversely affected by GCF funded projects or programmes.

The IRM is mandated to receive and consider complaints from people who believe they have been, or may be, adversely impacted by GCF projects or programmes failing to implement GCF policies and procedures.

The IRM is independent of the GCF Secretariat, and reports directly to the GCF Board, which oversees GCF's investments and management.

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I. INTRODUCTION

1. This report documents the Green Climate Fund (GCF) Independent Redress Mechanism (IRM) compliance appraisal in IRM Case C-0013- Uganda. It concerns a complaint received by the IRM on 11 March 2025 by project-affected communities, residing in Ruhinda sub-county in Rukungiri District, Uganda.¹ The complaint relates to GCF Project FP034 ("Project") "Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda."²
2. The complainants claimed that they experienced severe adverse impacts during the implementation of Project activities, namely the demarcation and restoration of relevant wetland areas in the district. The complainants requested confidentiality, and the IRM has granted it in accordance with its Terms of Reference (TOR)³ and Procedures and Guidance (PG).⁴ The complainants are represented by a civil society organization, the Health and Equity Policy Initiative (HEAPI).
3. This report provides a background to FP034 and to the complaint; describes relevant GCF operational policies and procedures; and assesses whether there is *prima facie* evidence of adverse impacts through non-compliance of the Project with GCF operational policies and procedures. Since the IRM concludes that there is such evidence and initiates a compliance investigation, the report also includes terms of reference for a compliance investigation.
4. The compliance appraisal and this report have been prepared in accordance with the updated TOR and PGs of the IRM.

II. BACKGROUND

Background to GCF Project FP034

5. GCF Project FP034 is intended to enhance Ugandan subsistence farmers' ability to deal with climate impacts through three major components: 1) restoration and management of wetland hydrology and associated catchments; 2) improved agricultural practices and alternative livelihood options in the wetland catchment; and 3) strengthening access to climate and early warning information to farmers and other target communities to support wetland management. The project aims to reach 24 districts in the south-western and eastern regions of Uganda.
6. FP034 was approved at the 15th meeting of the GCF Board on 15 December 2016, and the estimated completion date is 31 December 2027.⁵ At the time of approval by the GCF Board, the Project was assessed as belonging to environmental and social risk Category B. The Accredited Entity (AE) for this Project is the United Nations Development Programme (UNDP) and the Executing Entity (EE) for this project is the Ministry of Water and Environment (MWE) of the Republic of Uganda. At the time of the events alleged in the complaint, the Project was in its 7th year of implementation.

¹ [C0013 Uganda | Independent Redress Mechanism | Green Climate Fund](#)

² [FP034: Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda | Green Climate Fund](#)

³ [2017 IRM Terms of Reference | Independent Redress Mechanism | Green Climate Fund](#)

⁴ [procedures-and-guidelines-irm-final-july-2021_0.pdf](#)

⁵ See: [11-consideration-funding-proposals-consideration-request-changes-scope-funded-activity-fp034.pdf](#)

Summary of the Complaint:

7. The complainants' allegations⁶ pertain to a series of events that are said to have started in November 2023 in the Nyambabi wetland system. The issues raised by the complainants in this case have been summarized accordingly: 1) Violation of human rights of project-affected communities; 2) Destruction/demolition of homes without prior notice or compensation; 3) Demarcation of lands without adequate consultation; 4) Destruction of crops, trees and plantations (bananas, coffee, maize, beans, millet, cassava, groundnuts and rice); 5) Forced displacement of communities using security forces (police and/or army); and 6) Adverse impacts related to loss of life, livelihoods and increased impoverishment.
8. Complainants have also filed a complaint with UNDP's accountability mechanism, the Social and Environmental Compliance Unit (SECU) as of 19 May 2026.⁷ The IRM will work in close collaboration with SECU in subsequent phases in the processing of the complaint to promote complementary and mutually reinforcing outcomes.

Adverse impacts:

9. Complainants state that Project activities related to wetland demarcation caused "*misery and trauma*",⁸ loss of income, restricted access to livelihood sources, and destruction of crops. They allege that the resulting inability to continue cattle grazing, cultivation and other livelihood-sustaining activities has forced many residents to take bank loans, struggle with repayments, and withdraw children from school due to lack of funds.
10. One complainant alleged that security forces demolished their private residence, leaving them without shelter. A second complainant stated that they have been informed they must vacate their current residence as it falls within the area demarcated as a wetland or risk it being demolished.⁹ Complainants further allege that the destruction and cutting down of crops led to the death of one resident due to health complications resulting from stress. They report that they continue to live in fear and uncertainty.

Procedural History of IRM Complaint C-0013-Uganda

11. On 10 April 2025, the IRM found the complaint eligible¹⁰ and moved it to initial steps, which generally first seeks to determine whether a problem-solving process is feasible. After a related complaint was filed with UNDP's Stakeholder Response Mechanism (SRM) in May 2025, the IRM and SRM agreed to process the case jointly. During initial steps, the IRM assessed the issues and informed the parties of available options without assessing the merits. Following a July 2025 mission and virtual engagements, the complainants and Executing Entity confirmed on 12 September 2025 that problem solving was their preferred approach.¹¹
12. The IRM and SRM then engaged the parties, including through bilateral meetings in November 2025; in-person meetings with the Rukungiri complainants were not possible

⁶ [rukungiri-gcf-complaint-redacted.pdf](#)

⁷ [SECU0028 | Social and Environmental Compliance Unit - Case Registry](#)

⁸ [rukungiri-gcf-complaint-redacted.pdf](#)

⁹ Confidential complainant testimonies shared with the IRM

¹⁰ <https://irm.greenclimate.fund/sites/default/files/case/determination-eligibility-c0013-uganda.pdf>

¹¹ [initial-steps-report-c-0013-uga.pdf](#)

due to reprisal risks and logistical barriers. As of May 2026, the MWE declined to join an IRM-led dispute resolution process and proposed court-annexed mediation instead, which complainants accepted. Subsequently, the IRM closed problem solving under paragraph 48 of the PGs and referred the case to compliance review.¹²

III. COMPLIANCE APPRAISAL

Procedural Steps taken by the IRM

13. In accordance with paragraph 52 of the IRM's PGs, the GCF Secretariat, in consultation with the relevant AE (UNDP), as appropriate, the IRM on 2 June 2026 requested the Secretariat to provide a response to the complaint within 21 calendar days.¹³ The IRM also informed the National Designated Authority and UNDP that a request for response had been submitted to the Secretariat and informed them of the option to liaise with the Secretariat regarding the response.
14. On 11 June 2026, the GCF Secretariat requested and was granted an extension from 23 June 2026 to 3 July 2026 to submit the response to the complaint.¹⁴ The IRM further extended the period to conclude compliance appraisal from 24 July 2024 to 7 August 2026.¹⁵

Summary of Secretariat Response:

15. The Secretariat's response¹⁶ summarizes the due diligence, monitoring and remedial actions it states were undertaken by the Secretariat and, where relevant, UNDP and MWE. It reports that second-level due diligence of the funding proposal identified project risks and impacts, with recommendations later formalized through contractual covenants under the AMA and FAA following Board approval. The Secretariat also states that it monitored the Project through APRs, financial reports, an interim evaluation report and follow-up requests under the Monitoring and Accountability Framework. These reports recorded progress on studies, GRM establishment, livelihood planning and site-specific ESMPs, while also identifying recurring issues including livelihood support delays, community resistance, monitoring weaknesses and concerns regarding reported results.
16. Following the filing of IRM complaints in 2024, the Secretariat states that disbursements to UNDP were halted and the Project was placed under close and enhanced monitoring. Through corrective action plans, in-person missions and formal information requests, the Secretariat reports following up with UNDP on safeguard issues, livelihood delays and implementation challenges, including requiring a livelihood stock take, a time-bound action plan, stronger ESS oversight and improved GRM functionality. The Secretariat further reports that it found material non-compliance by UNDP with obligations under the FAA and AMA, issued a notice of default, requested a Project audit and required additional project-specific frameworks and implementation plans. The specific default events were later considered remedied, subject to follow-up actions, and the Project subsequently underwent restructuring to prioritize outstanding livelihood delivery, budget reallocations and a reduced restoration scope. The Secretariat states that it will continue enhanced monitoring

¹² [c0013-problem-solving-conclusion-report-final.pdf](#)

¹³ IRM, Request for Secretariat Response in relation to IRM Case C-0013-Uganda concerning FP034

¹⁴ [c0013-uganda-second-irm-extension-time-decision-rfr.pdf](#)

¹⁵ [c0013-uganda-second-irm-second-extension-time-decision.pdf](#)

¹⁶ Secretariat's Response to IRM request in relation to IRM Case C-0013-Uganda

of the Project, including quarterly progress reporting by UNDP on livelihood-related activities, to support timely delivery to communities and sustained compliance with environmental and social safeguards.

Issues Raised

17. In preparation of this compliance appraisal report, the IRM compliance function reviewed the following materials: (i) the complaint letter and attachments; (ii) public outputs from the IRM Case Register; (iii) the response of the GCF Secretariat and associated documentation; (iv) project documentation for FP034, at the pre-approval and post-approval phases; (v) publicly available information regarding the events that occurred on November 2023; (iv) public communication materials, audits, and reports produced by the GCF, UNDP and other project implementing entities regarding the Project; and (v) documentation related to applicable GCF policies and procedures.
18. In the IRM's view, the following issues arise for consideration in the compliance appraisal of this case:

Forced evictions and/or involuntary resettlement as a result of indefinite restrictions on land use and access to natural resources in areas marked for wetland restoration;

19. The IRM understands that complainants consider the demarcated areas of the Nyambabi wetland system to have been previously used or accessed under customary land tenure arrangements, and that they maintain they were not consulted or sensitized before demarcation and restoration activities began. They state that the Project introduced indefinite and involuntary restrictions on their ability to sustain livelihoods and engage in agricultural activities on land they had previously been able to access or use, and characterize the restoration and demarcation exercise as non-voluntary and as failing to recognize their historical ties to the areas now marked as wetlands.
20. In its response, the Secretariat notes that the Rushaya-Burombe-Nyakyera-Nyambabi wetland was gazetted under applicable Ugandan law and outlines stakeholder consultation and engagement beginning on 6 November 2023, with demarcation and restoration reportedly undertaken in five villages and consultation and sensitization in three others. Complainants contend that, regardless of the stage of implementation, they remain unable to use or return to the Project demarcated areas, depriving them of land-use rights and access to natural resources. The Secretariat's response does not disprove the alleged involuntary restrictions, and the IRM therefore finds *prima facie* evidence of non-compliance with applicable GCF policies and procedures, resulting in reported adverse impacts to the access and land-use rights of project-affected communities.

Economic and physical displacement of project-affected communities, without compensation;

21. Complainants state that Project-related restoration and demarcation activities in the Nyambabi wetland system resulted in mass economic displacement by depriving them of access to farming, livelihood-generating activities and natural resources. They further allege that crops, trees and other assets in areas marked for restoration were destroyed or removed, and that some affected persons experienced physical displacement, including being "*forced off our land...and our houses, crops demolished and slashed down.*"¹⁷

¹⁷ [rukungiri-gcf-complaint-redacted.pdf](#)

22. The Secretariat's response does not dispute the removal of crops, trees and other agricultural products, but notes UNDP's position that certain perennial crops and trees had been cut while annual crops were left in gardens pursuant to community engagement arrangements, that affected persons were to be formed into groups to identify alternative livelihoods, and that housing structures identified within wetland areas had not been demolished. The IRM understands that the GCF Board approved the FP034 Restructuring Proposal in June 2026 to address implementation gaps in alternative livelihood support for approximately 17,800 eligible households,¹⁸ but notes that complainants do not characterize their departure from the Project-demarcated areas as voluntary and that alternative livelihood measures do not address the alleged failure to anticipate and compensate losses experienced by Project-affected communities. In the IRM's view, implementation of Components 1 and 2 of FP034 therefore indicates *prima facie* evidence of non-compliance with applicable GCF policies and procedures, resulting in reported mass economic displacement of project-affected communities.

Lack of adequate stakeholder engagement and consultation with project-affected communities, including access to grievance redress mechanisms;

23. Complainants, who reside in villages across Burombe, Kicwamba, Ndere and Rwagoma parishes in Rukungiri District, allege that they received no prior notice of planned demarcation and restoration activities and described project implementation as a sudden and violent eviction ("*grabbing our land*," "*invaded our homes*," and "*armed individuals arrived unexpectedly*").¹⁹ They also note that a project-level implementation agreement specified activities in Burombe Parish, but allege that implementation extended to neighbouring parishes.
24. The Secretariat reports that stakeholder engagement and consultation meetings were held in Ruhinda sub-county and in Burombe, Kicwamba and Rwagoma parishes in November 2023, covering applicable wetland legal frameworks, restoration objectives and stakeholder involvement in implementation decisions. The Secretariat further reports that communities had agreed that demarcation would begin the week of 13 November 2023, with trees cut immediately while crops nearing harvest would not be cut, and that affected persons would be organized into groups to identify alternative livelihoods. Complainants dispute that crop cutting and clearing were based on mutual agreement, or that adequate prior engagement or notification occurred. The information reviewed therefore indicates *prima facie* evidence of non-compliance with applicable GCF policies and procedures, resulting in reported adverse impacts on informed consultation rights and access to GRMs in relation to alleged physical and/or economic displacement of project-affected communities.

Use of security personnel to reportedly forcibly evict project-affected communities;

25. Complainants maintain that they were forcibly evicted from the Nyambabi wetland in South Western Uganda in November 2023, and that their homes and crops were razed by government officials accompanied by armed police and/or military personnel. They allege

¹⁸ [GCF/B.45/07: Consideration of funding proposals: Consideration of a request for changes to the scope of funded activity FP034 \("Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda"\) | Green Climate Fund](#)

¹⁹ Complainant testimonies

that they were threatened with violence when they attempted to protest,²⁰ and that the stress of eviction and displacement led to the death of one resident.

26. The Secretariat response states that UNDP was not “*in a position to verify the accuracy of all allegations contained in the Complaint, in particular, those relating to the alleged use of force and security personnel during restoration activities*,”²¹ noting that verification was constrained by limited access to relevant facts and evidence, including due to ongoing legal proceedings in Uganda. However, the Secretariat’s response does not disprove the allegations concerning the presence and/or use of security personnel during Project activities. The IRM therefore finds *prima facie* evidence of non-compliance with applicable GCF policies and procedures, which may have contributed to reported human rights abuses experienced by project-affected communities.

Management of project-level environmental and social safeguards risks and GCF Secretariat responsibilities related to oversight, supervision and monitoring of the Project in pre-approval and post-approval phase;

27. Complainants assert that the Project’s ESMP stated that “*no displacement of people should be done*.”²² The IRM notes that the 2016 ESMP was prepared with the stated assumption that “*none of the projects will require the displacement of people*.”²³ While economic displacement was contemplated as a risk that could be managed through stakeholder consultation and community engagement measures, the IRM understands that project-wide safeguarding documentation did not reflect this risk until several years after approval. The safeguarding instruments later evolved from the 2016 ESMP to a 2019 ESMF covering future activities, and, following the approved 2026 restructuring proposal, an ESAP to be implemented for the remainder of the Project. The IRM also understands that a Livelihood Restoration Plan was developed in 2020 and later updated through the restructuring proposal into a Wetland Wise Use and Alternative Livelihood Framework and livelihood implementation plan.
28. The IRM notes that the 2021 Interim Evaluation Report flagged that human rights, displacement and resettlement risks should have been considered in Project design, and that the Project’s risk category was corrected from low to moderate only in 2018.²⁴ After the Secretariat’s ad-hoc check beginning in November 2024, the IRM understands that environmental and social safeguarding risks were managed through a Risk Management Action Plan and UNDP-focused Management Action Plans arising from the September 2025 UNDP audit, and that future alternative livelihood activities are intended to reach complainants and/or affected communities in the Nyambabi wetland system. Taken together, the IRM views Secretariat due diligence, oversight and monitoring of environmental and social safeguarding risks across three phases: pre-approval phase up to Board approval of the Project in December 2016, post-approval monitoring phase from 2017 to November 2024, and enhanced risk-based monitoring phase from November 2024 onward.

Due diligence pre-project approval:

²⁰ Complainant testimonies

²¹ Secretariat’s Response to IRM request in relation to IRM Case C-0013-Uganda

²² [rukungiri-gcf-complaint-redacted.pdf](#)

²³ p.2, Environmental and Social Management Plan, FP034

²⁴ [UNDP Uganda's Building Resilient Communities, Wetland Ecosystems - 00105972 | UN-RIAS](#)

29. The Funding Proposal package for GCF Project FP034 was presented and approved at the 15th Meeting of the GCF board in December 2016. In the period leading up to Board-approval, the GCF Secretariat carried out due diligence of the Project against applicable GCF policies at that time, including the GCF's Interim ESS policy.
30. The Secretariat's response highlights key actions undertaken leading up to Project approval such as – (i) reclassification of the Project to risk category B from C; (ii) updating ESMP to include social risks and impacts, and integrate project-level GRM information; (iii) due diligence on location of Component 3 activities and risks to Indigenous Peoples and (iv) “*strengthen the assessment*”²⁵ of any livelihood restoration activities. The IRM understands that the recommendations were embedded into the contractual arrangements entered into between UNDP and the GCF, specifying various actions to be undertaken during project implementation to address the identified social and environmental safeguarding risks. However, in the IRM's view, the contractual arrangements do not appear to align with the requirements under applicable policies at the time, namely those pertaining to economic displacement.
31. Taking into account the facts presented by complainants, the GCF Secretariat response and reviewing available project documentation, the IRM finds *prima facie* evidence of non-compliance of the Project with respect to due diligence of the Secretariat in assessing environmental and social risk management in the pre-approval phase. The IRM finds *prima facie* that such non-compliance, especially with regard to economic and/or physical displacement, may have contributed to adverse impacts experienced by complainants.

Post approval monitoring and supervision (January 2017 to November 2024):

32. In the first 7 years of project implementation (2017-2023), Secretariat responsibilities with regard to environmental and social safeguards oversight, monitoring and supervision of project implementation are captured in responses provided to self-reported APRs submitted by UNDP. The Secretariat in its response highlights actions undertaken with regard to reporting on livelihood interventions.
- For the CY2018 APR, the Secretariat requested details on livelihood restoration interventions and received a breakdown of alternatives shared with beneficiaries and information on future pledges. UNDP committed to providing a livelihood implementation plan, which the IRM understands the Secretariat obtained only in January 2025.
 - For the CY2019 APR, the Secretariat requested and received a copy of the Livelihood Restoration Plan and was notified by UNDP that a project-level GRM was in place.
 - For the CY2020 APR, the Secretariat advised UNDP not to carry out construction activities until site-level ESMPs were approved by NEMA and submitted to the GCF. UNDP reported that no grievances were received and that the LRP was being used to implement Project livelihood activities.
 - For CY2021 APR, the Secretariat requested and received information on the acceleration plan to improve delivery of livelihood alternatives, taking into account the findings of the Interim Evaluation Report. The CY2021 APR reportedly included

²⁵ Secretariat's Response to IRM request in relation to IRM Case C-0013-Uganda

information on 6 grievances received including those related to delays in provision of alternative livelihoods.

- For CY2023, the Secretariat requested information on community resistance to wetland restoration and additional clarification on safeguard matters.

33. The IRM takes note of the extended timeframe for reviewing and finalizing APRs. APRs for the previous calendar year are typically submitted within the first quarter of the following calendar year, but finalization of APRs for FP034 often took place in the last quarter of the year. This meant that issues flagged for the previous year's APRs were often not addressed well into the subsequent year of project implementation.

34. The IRM's initial assessment of the Secretariat's review of APRs in the first 7 years of project implementation indicates that commitments related to livelihood plans and ESMPs do not appear to have been adequately followed up. The IRM finds, *prima facie*, evidence of non-compliance of the Secretariat's monitoring and supervision of FP034 in the time period prior to November 2024.

Post approval monitoring and supervision (November 2024 - present) and remedial measures:

35. The Secretariat states that starting in the fourth quarter of 2024, following notification to the Secretariat of IRM complaints C0010 Uganda and C00011 Uganda, the Project has been under close and enhanced monitoring. The Secretariat conducted an ad-hoc in-country check in December 2024 and developed together with UNDP and MWE, the corrective risk management action plan.

36. The Secretariat further identified delays in completing safeguard-related activities and found that UNDP had failed to ensure Project compliance with certain environmental and social standards. Exercising its rights under relevant legal arrangements, the Secretariat issued a notice of default and requested remedial measures to bring the Project back into compliance. However, the IRM notes that, notwithstanding pending actions under the restructuring proposal, complainants allege they have not yet received remedy for the adverse impacts linked to potential Project non-compliance with applicable GCF policies and procedures. Although the restructured Project's alternative livelihood plan is intended to target affected communities in the Nyambabi wetland system, delivery reportedly remains significantly delayed, and the IRM has not seen evidence that this has been remedied as of this report.

37. At this early stage, the IRM has not assessed the Project's compliance in the post-approval phase with respect to the Secretariat's enhanced risk-based monitoring. However, despite measures to bring the Project back into compliance, complainants appear, *prima facie*, to continue experiencing adverse impacts linked to non-compliance in Secretariat oversight and supervision. The IRM will examine Secretariat actions to correct Project non-compliances during the investigation phase.

IV. SCOPE OF COMPLIANCE INVESTIGATION

38. The purpose of compliance investigation is to assess the merits of the complainants' allegations. The IRM is providing below a list of indicative policies against which it will assess compliance. The IRM understands the Board-approved Project restructuring may have triggered application of updated versions or successors policies to the ones listed below as well as any new policies adopted since the initial approval of the Project. In the

investigation phase, the IRM will account changes in policy environment, as they may be applicable, for FP034.

- (i) The GCF's Interim Environmental and Social Safeguards [Performance standards of the International Finance Corporation](Decision B.07/02, paragraph (c) and Annex III), in particular Decision B.07/02 Annex III, Part I, Section 1.1 (a)-(d), Section 1.4 (a)-(b), Section 1.5 (a)-(c); and relevant references in Part II (i.e. Guidance notes and relevant Guidelines relating to PS 1, PS 4 and PS 5);
- (ii) The GCF's Environmental and Social Policy (Decision B.19/10);
- (iii) The GCF's Monitoring and Accountability Framework for Accredited Entities (Decision B.11/10);
- (iv) The GCF's Initial Project and Programme Activity Cycle, including the criteria for programme and project funding (Decision B.07/03);
- (v) The GCF's Risk Management Framework, as applicable; together with relevant provisions of the Initial Financial Risk Management Framework (Decision GCF/B.07/05), including updates or successors to policies comprising the Risk Management Framework related to the roles and responsibilities of the GCF Secretariat in time period spanning the design and implementation phases of the Project;
- (vi) The Results Management Framework and Performance Measurement Framework, and successor policies.

39. The IRM identifies the following five questions as guiding the investigation:

- (i) Have project-affected communities experienced forced evictions and/or involuntary resettlement in the form of permanent or indefinite expropriation of lands and natural resources as a result of non-compliance of GCF Project FP034 with applicable GCF policies and procedures related to land acquisition and/or resettlement?
- (ii) Have project-affected communities experienced economic and physical displacement in the form of loss of assets, income and access to livelihoods and ability to engage in economic activities as a result of non-compliance of GCF Project FP034 with applicable GCF policies and procedures related to land acquisition and/or resettlement and informed consultation?
- (iii) Have the rights of project-affected communities to meaningful stakeholder consultation, information disclosure and access to grievance mechanisms been adversely impacted as a result of non-compliance of GCF Project FP034 with applicable GCF-policies and procedures related to stakeholder engagement and consultations?
- (iv) Have project-affected communities experienced increased threats to community health, safety and security and human rights abuses as a result of non-compliance of GCF Project FP034 with applicable GCF policies and procedures?
- (v) Were adverse impacts experienced by project-affected communities caused by non-compliance of GCF Project FP034 with applicable GCF policies and procedures governing environmental and social risk management?

- (vi) Does the GCF Secretariat's due diligence, monitoring and supervision of the GCF Project, in pre-approval and post-approval phase, comply with requirements under applicable GCF policies and procedures, including the Interim ESS, Monitoring and Accountability Framework, Environmental and Social Policy and Risk Management Frameworks?

40. In alignment with para. 13.04 of the original 2016 Accreditation Master Agreement,²⁶ the IRM and UNDP's Social and Environmental Compliance Unit (SECU) have agreed on collaborative arrangements in the processing of this compliance investigation. Each mechanism will examine (i) the Project's compliance with policies, social and environmental commitments and procedures applicable to their respective institution and (ii) whether their own institutions action and/or inaction was in compliance with their respective policies, social and environmental commitments and procedures. The mechanisms will coordinate on fact gathering activities, including field missions and interviews, to the extent possible, and will endeavour to make final reports consistent and complementary, consistent with each mechanism's distinct mandates. However, the IRM may consider the feasibility of the collaboration with SECU if there are significant or actual delays of investigation milestones and coordination of joint investigation activities, significant disagreements about factual basis, report recommendations and/or Administrator or Board decisions that would not appropriately redress harms, and inadequate/ineffective implementation of monitoring.
41. As part of its compliance investigation, the IRM will gather and review information, as appropriate, from concerned stakeholders and witnesses, including the complainants, the GCF Secretariat, UNDP, the NDA, EE, and other relevant stakeholders. The compliance investigation may include document reviews, meetings, discussions, site visits, evidence gathering, and expert opinions. At the conclusion of its investigation, the IRM will prepare a compliance investigation report for submission to the Board of the GCF. The report will include such recommendations on remedial actions, if any and as are appropriate, in the light of the findings of the IRM.

²⁶ Accreditation Master Agreement between GCF and UNDP, 2016