



GREEN  
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# Problem Solving Conclusion Report

## IRM Case C-0013-Uganda

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

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14 May 2026

#### **Summary**

This report provides information to the Board on the outcomes of a problem solving process of the Independent Redress Mechanism (IRM)'s case C-0013-Uganda related to the GCF Project FP034: Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda, as per paragraphs 44 and 46 of the [Procedures and Guidelines of the IRM](#) (Board Decision B.22/22).



## Executive Summary

On 11 March 2025, the Independent Redress Mechanism (IRM) of the Green Climate Fund (GCF) registered a [complaint](#) submitted by wetland-dependent communities in Rukungiri District (complainants), southwestern Uganda, in relation to GCF-funded project [FP034, “Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda” \(the Project\)](#). The Project aims to enhance Ugandan subsistence farmers’ ability to deal with climate change impacts by restoring wetlands and supporting farmers in diversifying their livelihoods. The Accredited Entity for this Project is the United Nations Development Programme (UNDP, or AE), and the Executing Entity is the Ministry of Water and Environment (MWE, or EE) of the Republic of Uganda. The complainants are represented by the Health and Equity Policy Initiative (HEAPI), a civil society organisation based in Uganda.

The complaint arises from events related to the implementation of the project in the Nyambabi wetland system in Rukungiri District in November 2023. The complainants are wetland users and allege a range of adverse impacts, including 1) violation of property rights of wetland-dependent communities; 2) destruction of homes, crops, trees and plantations; 3) forced displacement of wetland-dependent communities in the presence of security forces; and 4) since those events occurred, complainants claim non-provision of alternative livelihood support.

In April 2025, the IRM determined the complaint [eligible](#) for further processing. In May 2025, the complainants also filed their complaint with the grievance mechanism of the Accredited Entity, UNDP’s Stakeholder Response Mechanism (SRM). For the purposes of efficient and effective case-processing and with the consent of complainants and the other parties, the IRM and the SRM processed this case jointly.

During the initial steps phase (from April to September 2025), the IRM and SRM conducted several bilateral meetings, including an in-country mission to Uganda in July 2025, and met with MWE and the complainants’ representatives. The meetings were intended to gather additional information on the concerns raised and determine whether the complaint could be processed through problem solving. In September 2025, both the complainants and MWE (together as parties) [expressed a preference for problem solving](#), a dialogue-based process facilitated by the IRM and SRM in relation to the concerns raised, seeking to support parties reach agreement.

From September 2025 to April 2026, the IRM and the SRM engaged with the parties to help them agree on a process design and topics for discussion with the aim of finding a resolution to the concerns raised. However, due to ongoing court litigation in Uganda covering similar issues and involving similar parties, MWE expressed hesitation to engage. Following an IRM mission to Uganda in November 2025 and subsequent virtual engagements, in March 2026, MWE proposed to pursue a court-annexed mediation in Uganda, which the complainants agreed to. In light of these developments, the IRM determined that there was no need for an IRM-led problem solving to run in parallel and notified the parties of its decision to conclude the problem solving stage and transfer the case to the IRM compliance function for further consideration, as per paragraph 48 of the [IRM’s Procedures and Guidelines \(PGs\)](#).

Prior to finalising this report, the IRM circulated it to the parties and received their feedback. The final report will be submitted to the GCF Board for information and will be published on the [IRM Case Register](#).



## I. Introduction

The IRM is mandated to handle complaints received from a person or group of two or more persons or communities who have been or may be affected by adverse impacts of a GCF project or programme, under paragraph 11 of its Updated Terms of Reference (Decision B.BM-2017/10).<sup>1</sup> In handling a complaint, the IRM is required to offer problem solving to the parties as a means of resolving a complaint under the Procedures and Guidelines (PGs) of the IRM (Decision B.22/22).<sup>2</sup>

As per paragraph 48 of the PGs, “If problem solving does not result in an agreement, or if problem solving is wholly or partially unsuccessful, the grievance or complaint or any part of the grievance or complaint that remains unaddressed will be referred for compliance review within seven (7) calendar days of the conclusion of problem solving and the IRM website shall be updated accordingly within five (5) calendar days of the decision to refer the grievance or complaint for compliance review.” Accordingly, this problem solving conclusion report provides a summary of the IRM’s and SRM’s endeavours to support parties in reaching a resolution. Despite the efforts made, due to parties’ lack of consensus, the case is being referred to the IRM’s compliance function for further processing.

## II. Background

### 2.1 The Project

The [complaint](#) relates to the GCF-funded Project FP034, “Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda.”<sup>3</sup> The Project is intended to enhance Ugandan subsistence farmers’ ability to deal with climate change 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 targets 24 districts in the southwestern and eastern regions of Uganda and was approved by the GCF Board on 15 December 2016. The Project is expected to be completed by 31 December 2026, pending any official extensions. The Accredited Entity for this Project is the UNDP, and the Executing Entity is the MWE of the Republic of Uganda.

### 2.2 The Complaint

On 11 March 2025, the IRM registered a [complaint](#) submitted by wetland-dependent communities residing in Rukungiri District, southwestern Uganda, in relation to FP034. The complainants requested and were granted confidentiality in accordance with the IRM’s TOR and PGs. The complainants are represented by the Health and Equity Policy Initiative (HEAPI), a civil society organisation based in Uganda.

The complaint relates to events surrounding the implementation of the project in the Nyambabi wetland system in Rukungiri District in November 2023. The complainants allege several adverse impacts, including 1) violation of property rights of wetland-dependent communities; 2) destruction of homes, crops, trees and plantations; 3) forced displacement of wetland-dependent

<sup>1</sup> The IRM’s Updated Terms of Reference is available at: <https://irm.greenclimate.fund/document/irm-tor>

<sup>2</sup> The IRM’s Procedures and Guidelines is available at: <https://irm.greenclimate.fund/document/2019-procedures-and-guidelines-irm>

<sup>3</sup> More information about FP034 is available at: <https://www.greenclimate.fund/project/fp034>



communities in the presence of security forces; and 4) since those events occurred, complainants claim non-provision of alternative livelihood support. When submitting the complaint to the IRM, the complainants' representatives shared that in December 2023 they had initiated legal proceedings with the local courts of Uganda pertaining to the same issues outlined in their complaint and involving similar parties.

### III. Eligibility and Initial Steps

On 10 April 2025, the IRM determined the complaint [eligible](#) under its TOR and PGs,<sup>4</sup> and moved the case to the initial steps stage. Consequently, the IRM started engaging with the complainants, MWE and UNDP to better understand the issues raised and to provide further information on the two complaint handling modalities (problem solving and compliance), as indicated in paragraph 36 of the IRM's PGs.

In May 2025, the complainants informed the IRM that they filed a similar complaint with UNDP's SRM.<sup>5</sup> For more efficient and effective case processing, the IRM and SRM sought consent from all parties and processed this case jointly.

Following an in-country mission to Uganda in July 2025 and subsequent virtual engagements with the IRM and SRM, on 12 September 2025, both the complainants and MWE indicated that problem solving was their [preferred choice](#) to handle their case, hoping that the parties would arrive at a mutually satisfactory agreement that would address the concerns raised.<sup>6</sup>

### IV. Problem Solving

#### 4.1 Process Design

The IRM Problem Solving is a participatory and flexible process aimed at assisting parties in finding and/or developing an effective solution to the concerns raised by complainants. A problem solving process focuses on addressing the concerns that gave rise to a grievance or complaint in a way that meets the interests of the complainants and the other parties and is mutually satisfactory. A problem solving process does not seek to determine culpability or assign blame, nor is it a compliance review.

The entire problem solving process is conducted in confidence to enable the complainants and other parties to engage with each other, build trust, and collectively explore solutions in a safe space. All information used in a problem solving process is held in confidence by the IRM problem solving team and is not used in any future IRM processes, including in a compliance review.

For this case, the main parties identified for the problem solving process were the complainants and MWE, the Executing Entity for FP034. The complainants are project-affected people located in the Nyambabi wetland in Rukungiri District, Republic of Uganda, and are represented by HEAPI. The UNDP Uganda Country Office and the GCF Secretariat participated in meetings as observers when invited and provided their views and support to the process.

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<sup>4</sup> The Eligibility Determination is available at: <https://irm.greenclimate.fund/sites/default/files/case/determination-eligibility-c0013-uganda.pdf>

<sup>5</sup> The UNDP Stakeholder Response Mechanism's case page on this complaint is available at: [SRM014 | Stakeholder Response Mechanism - Case Registry](#)

<sup>6</sup> The Initial Steps Report is available at: <https://irm.greenclimate.fund/sites/default/files/case/initial-steps-report-c-0013-uga.pdf>



## 4.2 Problem Solving Process and Outcomes

The problem solving stage commenced in September 2025 and right after, the IRM and SRM sought to engage with the parties and initiate a dialogue to identify common topics for discussion and to create a space for parties to engage constructively. The IRM met the complainants' representatives, UNDP and MWE bilaterally during its mission to Uganda in November 2025. Due to potential risks of reprisal, the IRM could not meet in person with locally affected complainants from Rukungiri, nor was it able to visit the project site relevant to the complaint.

In the months following the in-country mission, despite the IRM's and SRM's efforts to help parties design and initiate a problem solving process, MWE expressed continued reservations regarding their participation. They explained that they are unable to engage in an IRM and SRM-led problem solving, due to ongoing court proceedings in Uganda brought against the government by the complainants covering similar issues and involving similar parties.

Despite the IRM and SRM made multiple attempts to get parties' consent to an IRM-led dialogue, in March 2026, MWE stated its intention to proceed with a court-annexed mediation in Uganda, to which the complainants agreed. Considering these developments, the IRM determined that there was no need for a problem solving to run in parallel and notified the parties of its decision to conclude the problem solving stage.

## V. Conclusion

Following numerous efforts to initiate the problem solving process under this case, MWE indicated that they couldn't participate in an IRM-led problem solving process and instead proposed a court-annexed mediation in Uganda, which the complainants agreed to. The IRM took note of the parties' decision and determined that there was no need for an IRM-led problem solving process to run in parallel. Accordingly, and in line with paragraph 48 of the [IRM's Procedures and Guidelines \(PGs\)](#), in the absence of MWE's willingness to participate in an IRM-led problem solving process, the IRM concluded the problem solving stage and referred the case to the IRM compliance function for further consideration.

Prior to finalising this report, the IRM circulated it to the parties and received their feedback. The final report will be submitted to the Board for information and will be published on the [IRM Case Register](#).