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Self-Initiated Proceedings

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

IRM Case C-0023-Uganda

24 July 2026

IRM-Initiated Proceedings Report

1. The Terms of Reference (TOR)¹ and the Procedures and Guidelines (PGs)² of the Independent Redress Mechanism (IRM) set out how the IRM deals with grievances or complaints. As described in paragraph 12 of the TOR, the IRM may decide to initiate proceedings under certain circumstances if a person or persons who may be adversely impacted are unable to access the IRM. Information received must meet the criteria set out in paragraph 71 of the PGs, on the basis of *prima facie* evidence, for proceedings to be initiated by the IRM. Once a proceeding is initiated by the IRM, the PGs require that information received shall be treated as an eligible grievance or complaint. It is to be noted that the IRM-initiated proceedings report is procedural, and that it does not represent a judgement on the merits or the substance of the case.

Summary of IRM-Initiated Proceedings

2. The IRM's TOR and PGs establish the basis for the IRM to initiate proceedings on its own to investigate grievances when certain criteria are met. Paragraphs 71 and 72 of the PGs further explain the criteria and procedure for these proceedings.
3. If the following three criteria are met the IRM may initiate its own proceedings:
 - a) The IRM must have received information from a credible source that a GCF funded project or programme has adversely impacted or may impact a person, group of persons or community.
 - b) The information received must, if true, pose a significant reputational risk to the GCF.
 - c) The person(s) adversely impacted must be unable to access the IRM.
4. In order to ascertain if there is material to *prima facie* satisfy the above three conditions, the IRM undertakes a preliminary inquiry. This is a process that is internal to the IRM. The preliminary inquiry could be triggered by information gathered through general media monitoring by IRM staff or through information presented to or otherwise received by the IRM.

Background

5. GCF Project FP034³ 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.⁴ The project aims to reach 24 districts in the south-western and eastern regions of Uganda. FP034 was approved at the 15th meeting of the GCF Board on 15 December 2016, and the estimated completion date is 31 December 2027. The Accredited Entity (AE) for this Project is the United Nations Development Program (UNDP) and the Executing Entity (EE) for this project is the Ministry of Water and Environment (MWE) of the Republic of Uganda.

¹ See: [bbm-2017-10-decision-board-updated-terms-reference-independent-redress-mechanism-revised.pdf](#)

² See: [procedures-and-guidelines-irm-final-july-2021_0.pdf](#)

³ FP034: [Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda | Green Climate Fund](#)

⁴ [Building resilient communities, wetlands ecosystems and associated catchments in Uganda | Green Climate Fund](#)

6. The construction of water retention facilities and fishponds had been envisaged to support wetland restoration and serve as alternative livelihood options for wetland dependent communities (Components 1 and 2). The IRM understands that as of early 2025, the project had constructed 19 water retention facilities across 16 project districts, out of which two facilities had been classified as abandoned or no longer in use.⁵ Progress on the construction of water storage facilities, fishponds, and other construction works undertaken by the project can be found in project Annual Performance Reports (APRs) submitted by UNDP to the GCF on activities conducted the previous calendar year. A UNDP Audit Report on the project, published in October 2025, observed that at the time of initial construction activities starting in 2018, *“health and safety mitigation measures were not fully implemented, leaving associated safety risks unmitigated for extended periods.”*⁶
7. APR reporting includes a dedicated section related to environmental and social safeguarding risks which AEs may use to self-report challenges encountered during project implementation. In publicly available APR reports from calendar years 2021 to 2023, fencing issues and/or the risk of drowning related to water retention facilities and fishponds were identified as part of key risks and/or grievances received related to project implementation.⁷
8. Through a series of engagements spanning October 2024 to January 2025, the IRM received information regarding three fatal drowning incidents of minors that occurred at water-retention facilities that were under construction or had been previously constructed under GCF-funded project FP034, “Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda.” Two incidents were reported confidentially to the IRM in October and December 2024 respectively and a third incident was communicated by UNDP to the GCF Secretariat in January 2025.
9. The IRM was further alerted in October 2024 that water retention facilities continued to pose risks to community health, safety and security due to the lack of adequate safety measures, such as fencing and warning signs. Following notification of these incidents, the IRM received complaints from 2 the families of the deceased – both based in the South-West region of Uganda.
10. **Incident #1:** In October 2024, the IRM was made aware of a fatal drowning incident that had occurred on 29 September 2024, involving a 17-year-old male. The victim had drowned at the site of a water retention facility in Rukiga District that was under construction as part of the GCF project. In November 2024, the IRM registered a complaint, IRM Case C-0011-Uganda,⁸ filed by the family members of the deceased.

Status of IRM Case: IRM Case C-0011-Uganda was closed on 27 June 2025 following the complete implementation of activities outlined in a cooperative agreement between the complainants and the executing entity. Complainants had indicated their preference to arrive at an early resolution that addressed the immediate needs of the family. As a result, an agreement was reached in the Initial Steps Phase,⁹ not long after the IRM determined the

⁵ Internal project documentation

⁶ [UNDP Uganda's Building Resilient Communities, Wetland Ecosystems - 00105972 | UN-RIAS](#)

⁷ [Operational documents | Green Climate Fund](#)

⁸ [C0011 Uganda | Independent Redress Mechanism | Green Climate Fund](#)

⁹ [initial-steps-report-c0011-uganda.pdf](#)

complaint to be eligible. The agreement reached did not purport to address or redress the loss of life and all related harms, but rather to provide support for immediate needs identified by the family.

11. **Incident #2:** In December 2024, the IRM was made aware of a second fatality involving a minor, an 8-year-old girl, who had drowned in a water retention facility in South-West Uganda. The IRM was informed that the incident took place in March 2023 and that at the time of the incident the facility was under construction and part of activities under GCF Project FP034. In January 2025, the IRM registered a complaint (IRM Case C-0012-Uganda)¹⁰ filed by the family members of the deceased.

Status of IRM Case: IRM Case C-0012-Uganda was closed on 19 March 2026, following a comprehensive problem-solving process that was facilitated by the IRM in collaboration with the UNDP's Stakeholder Grievance Response Mechanism.¹¹ A problem-solving agreement was reached between the affected family and the Executing Entity in November 2025, with a focus on provision of livelihood support. Monitoring on the agreement concluded in March 2026. The agreement reached explicitly did not address or redress the loss of life and all related harms but rather aimed to provide support for immediate needs identified by the family.

12. **Incident #3:** In January 2025, the Accredited Entity (UNDP) notified the GCF of a third fatality that reportedly occurred in November 2024, at a water-retention facility in Eastern Uganda that had been constructed under GCF Project FP034 but had subsequently been abandoned as part of the project, or was allegedly no longer in use by the community at the time of the incident. The IRM to date has not received a complaint on this incident but requested and received, via the GCF, preliminary information on the circumstances of the incident and status of the fencing and safety measures on-site.
13. Both IRM cases related to fatalities, IRM Case C-0011-Uganda and IRM Case C-0012-Uganda, were processed through a dialogue-based dispute resolution process, with a focus towards addressing the stated immediate needs of affected family members. The cases were closed following the conclusion of an Initial Steps Phase and a Problem-Solving Phase respectively. In both cases, IRM fact-finding on the circumstances of the drowning was limited to establishing links to the GCF project, as per the criteria for determining eligibility. In summary, IRM casework related to the fatal drowning incidents, thus far, has not involved fact-finding or document review of project-specific safeguarding risks and mitigation measures nor has it examined the incidents through the lens of compliance-review, with a view toward ensuring compliance with applicable social and environmental policies and to promote institutional learning and accountability and prevent reoccurrence of similar or related adverse impacts.

Preliminary inquiry process

14. Following the conclusion of casework related to the fatal drowning incidents (IRM Case C-0011-Uganda and IRM Case C-0012-Uganda), the IRM was made aware of significant gaps in its understanding of potential non-compliance with GCF policies and procedures, and risks associated with the subsequent harm experienced by affected communities. Based on this information and the gravity of the outstanding concerns, the IRM has decided to open a

¹⁰ [C0012 Uganda | Independent Redress Mechanism | Green Climate Fund](#)

¹¹ [SRM013 | Stakeholder Response Mechanism - Case Registry](#)

preliminary inquiry to determine whether the IRM should initiate proceedings under paragraph 12 of the IRM's TOR.

Steps taken during the preliminary inquiry

Document review

15. The IRM reviewed project documentation, inclusive of the GCF Funding Proposal document and related safeguarding instruments, APRs from Calendar Year 2017 to Calendar Year 2024, the Interim Evaluation Report, the UNDP Audit report on FP034 and documentation related to GCF, AE and EE actions that were prepared subsequent to the notifications regarding the three fatalities.
16. The IRM examined documentation related to the construction of water retention facilities, as part of activities related to restoration and management of wetland ecosystems and development of livelihood infrastructure (irrigation systems, fishponds, etc.). The IRM further reviewed documentation from mission reports conducted by GCF, AE and EE teams with regard to the community, health, safety and security safeguarding risks, impacts and mitigation measures. While early APRs did not indicate site-specific risks, the IRM notes that reporting in APRs from CY2021 contains information related to site-specific risks posed by construction of water retention facilities and/or fishponds.
17. CY2018 APR reports the construction of one water retention facility, stating *"In line with GCF guidelines, social and environmental screening for this activity was carried out. Based on the scale and passive non-intrusive design, as per GCF guidelines for environmental and social screening, the intervention was deemed of minimal to no environmental and social risks and impacts and no further assessments were required,"*¹² and notes that site-specific ESMPs would be developed in 2019 before construction activities *"to ensure effective management of identified risk throughout the construction process."*¹³
18. CY2019 APR reports the construction of a second water retention facility and states, in relation to the site, *"The MWE has guidelines for management of projects being implemented in wetland areas. These guidelines were followed and as a result, no negative environmental and social aspects have been reported to date."*¹⁴ The APR also reports the development of site-specific ESMPs for the two wetland sites reportedly containing details on measures to address any likely negative environmental and social impacts.
19. CY2020 APR observes non-compliance with documented mitigation measures for the implementation of safeguards as a key environmental and social risk that was addressed in the reporting period. The risk was reported to have been addressed *"through continuous monitoring and supervision of the contractors."*¹⁵
20. CY2021 APR reports *"delays in the installation of fencing around water retention facilities and fishponds"*¹⁶ and states that these *"have been addressed by ensuring the contractor appointed*

¹² CY2018 APR, p. 11 [fp034-2018apr.pdf](#)

¹³ CY2018 APR, p. 31 [fp034-2018apr.pdf](#)

¹⁴ CY2019 APR, p. 22 [fp034-2019apr.pdf](#)

¹⁵ CY2020 APR, p. 38 [fp034-annual-performance-report-cy2020-disclosable.pdf](#)

¹⁶ CY2021 APR, p. 8 [fp034-annual-performance-report-cy2021.pdf](#)

watchmen, putting warning signs, and constant supervision during the construction phase to ensure safety.” As a key environmental and social risk, the APR further notes “Project sites were secured from intruders. The water retention sites were also secured to avoid accidental drowning especially by children” and that “No major issues arose that needed to be brought to the attention of the accredited entity and GCF.”¹⁷

21. CY2022 repeats the risks posed by lack of fencing and further records the following grievance dated 14 November 2022:¹⁸

- a. **Description of Issues** Unfenced Water Retention facilities posed a threat of drowning especially by Children.
- b. **Description of Resolution:** The Project management Unit resolved that the costs of fencing off the project sites should be included in the Bills of Quantities and be incurred by the Contractor. Project Sites that are not fenced are not to be cleared for payment. Warning signposts are being erected at the project sites to make the community aware of the existence of relatively deep-water retention dams that may pose a threat of drowning so as to avoid getting too close or Swim in them. Measures have been put in place to restrict access to areas under excavation by use of temporary barriers, which include hoarding off children from access to areas under construction, in addition to other warning signs.
- c. **Status:** All completed sites have been fenced off; warning signs have been installed on ongoing construction sites to avoid accidents. These will be fenced off in 2023 after completion of construction works.

22. CY2022 APR was submitted by the AE to GCF on 2 March 2023, with the above information. The APR review was finalized and completed on 16 November 2023 with a note from the GCF stating that they did not have any major comments.

23. CY2023 APR similarly reports on a grievance filed on 10 October 2023. A description of the grievance states “*Excavated fishponds and water retention facilities not fenced in Namutumba district.*”¹⁹ The resolution provided states “*fencing planned for in the coming period*”²⁰ and that the status of the grievance is ongoing. GCF approved the APR on 30 October 2024 with a note acknowledging the need for further discussions on safeguards, reporting and implementation issues.

24. CY2024 APR was submitted on 1 March 2025. The report was therefore submitted after documentation had indicated links between the three drowning incidents and project activities. The APR notes that “*fencing of all investment sites*” as one of the activities implemented during the calendar year.²¹ At the time of submission and/or finalization, the APR notes that fencing had been completed for 4 out of 6 sites in the eastern region. The site of one fatality was reported as being unfenced. The APR notes that implementing entities of the Government of Uganda will undertake immediate steps to fence all unfenced facilities and that UNDP will provide oversight to ensure completion by March 2025. UNDP further reported that it would be

¹⁷ CY2021 APR, p. 54 [fp034-annual-performance-report-cy2021.pdf](#)

¹⁸ CY2022 APR, p. 43 [fp034-annual-performance-report-cy2022-v.pdf](#)

¹⁹ CY2023 APR, p. 46 [fp034-annual-performance-report-cy2023.pdf](#)

²⁰ CY2023 APR, p. 46 [fp034-annual-performance-report-cy2023.pdf](#)

²¹ CY2024 APR, p. 50 [fp034annualperformancereportcy20242026-06-19092215.pdf](#)

undertaking assessment of compliance at all investment sites.

25. An additional risk posed by “non-functioning sites” is identified by the CY2024 APR, namely that such sites “pose danger to community health and safety through unauthorized entry, accidental falls and drowning. Therefore, it is important for non-functioning sites to decommissioned [sic] where possible or re-purposed, however for all actions, the sites need to be fully secured and fenced to prevent potential harm and danger to the communities.”²² Per the APR, there remained a lack of agreement on assessments and recommendations for decommissioning amongst government agencies, and that UNDP was engaging with the agencies to reach a decision on these sites.
26. A list of grievances provided to the GCF as part of APR reporting does not detail any grievances received pertaining to the three drownings. The APR does note the two IRM cases registered in the reporting period, attributing it as part of the reason for changing the risk categorization of the project to high risk.
27. In addition to APRs, a mid-term evaluation report on the project was commissioned by UNDP and submitted to GCF in September 2021.²³ The mid-term evaluation report surfaced several risks related to infrastructure works, namely fishponds, dams, irrigation systems and water retention facilities, including risks stemming from lack of maintenance and follow up activities to ensure sustainability of the sites.
28. The evaluation report assessed the ‘stakeholder ownership on the project outputs in terms of economic feasibility’ to be Moderately Unsatisfactory, noting that a lack of capacity of local communities to maintain infrastructure works was observed with lack of fencing or collapse of fencing in project sites, including those with fishponds.
29. In assessing the reasons for delays in project implementation, the Interim Evaluation Report notes that certain district level staff reported not being involved in site-planning for construction of dams and fishponds, with no follow up support offered to district officials after the main implementing agencies returned to Kampala.
30. The IRM further reviewed internal documents that stemmed from GCF Secretariat missions to project sites in December 2024 and March 2026. The documentation offered details on adaptive measures and plans taken to address the risks highlighted by these drowning incidents, namely a Risk Management Action Plan, and a subsequent Audit Report published by UNDP’s Office of Audit and Investigations (at the request of the GCF Secretariat) and follow-up.
31. The UNDP Audit Report summarizes at length the issues related to community health, safety and security and concludes that UNDP Uganda “made significant progress in mitigating health and safety risks” noting that planned mitigation measures for handling health and safety risks related to water retention facilities and fishponds have largely been implemented.²⁴

“Given that we visited 50 percent of the districts with project investments, we concluded that it was likely that our findings agreed with UNDP’s June 2025 response to GCF’s “Notice of Event of Default and Cure Period”, which indicated that safety measures had been implemented across all

²² CY2024 APR, p. 51 [fp034annualperformancereportcy20242026-06-19092215.pdf](#)

²³ [Mid-Term Evaluation of Building Resilient Communities in Uganda Project](#)

²⁴ See p. 5: [UNDP Uganda’s Building Resilient Communities. Wetland Ecosystems - 00105972 | UN-RIAS](#)

project districts.”²⁵

32. On the Environmental and Social Management Plan, the Audit found several delays in the implementation of environmental and social safeguards. Relevant to the construction of fishponds and water retention facilities, the audit notes that UNDP was required to submit a detailed ESMP to the GCF prior to commencing construction works but found that site-specific ESMPs were only finalized in January 2025 or after construction activities had concluded. The audit further found lack of evidence of post-construction monitoring of these sites. This finding was marked as “High (Critical)” per its risk management framework, resulting in a recommendation and management action plan.
33. The audit further surfaced a finding of “*construction deficiencies in water retention facilities and fishponds*” noting the absence or variable quality of documentation related to the design and operation of these sites.²⁶ As the finding was marked as “Medium (Important)” a recommendation and management action plan was proposed.
34. The IRM notes that through 2025 and 2026, GCF, UNDP and MWE have overseen or carried out several missions and activities related to responding to the risks brought to light by the three drowning incidents, in addition to addressing other project-related risks and impacts. In assessing more recent project documentation and action plans, the IRM notes that while plans were focused on addressing ongoing safety and health risks and impacts, there hadn’t been an independent and comprehensive investigation into the circumstances leading up to the drowning incidents and potential related non-compliance with relevant due diligence, monitoring and oversight, reporting, and safeguarding requirements since implementation began on the project.
35. The UNDP audit, to a certain extent, examined compliance against contractual provisions related to safeguarding systems, but does not elaborate on the facts underlying non-compliance with safeguarding policies, nor does it cite the specific safeguarding standards against which compliance may have been assessed. The IRM understands that a compliance review exercise of this scope and depth would be the remit of the Social and Environmental Compliance Unit (SECU), which although housed within the UNDP Office of Audit and Investigations (OAI) did not participate in the audit exercise. The IRM further understands that the audit team worked directly with the GCF Secretariat to develop the objectives of the audit, which included matters related to compliance with other applicable policies such as UNDP Financial Regulations and Rules and Internal Control Framework and other policies related to expenditures.

Information received through Stakeholder Interviews:

36. In registering and processing the initial phases of C-0011-Uganda and C-0012-Uganda from November 2024 through March 2025, the IRM conducted several fact-finding missions to meet with project-affected communities and family members of the deceased in Southwest Uganda. In January 2025, an IRM team visited the sites of the fatalities and met with relevant stakeholders, including community members, complainants and representatives of the UNDP Country Office and MWE.
37. The IRM verified, through eyewitness accounts and audio-visual evidence, an absence of

²⁵ See p. 6: [UNDP Uganda's Building Resilient Communities. Wetland Ecosystems - 00105972 | UN-RIAS](#)

²⁶ See p. 9: [UNDP Uganda's Building Resilient Communities. Wetland Ecosystems - 00105972 | UN-RIAS](#)

adequate fencing around the site in the immediate aftermath of the incident. At the time of the IRM visit, in January 2025, the site had been secured with permanent fencing, warning signs and secure locks to prevent access to the site.



Water Retention Facility, Rukiga District, January 2025

38. The IRM visited the site of the drowning incident in Kisoro District dating to March 2023. The IRM observed that the water retention facility was essentially indistinguishable from the surrounding wetland areas, having been further eroded and flooded as a result of a separate project that had diverted a river. Concrete markers and barbed wire that had been placed around the boundaries of the water retention facility were either absent in large sections of the perimeter, severely degraded or in a state of disrepair. The IRM understands that the site was fenced later in 2025.



Water Retention Facility (non-functioning), Kisoro District, January 2025

39. Finally, the IRM visited the site of the third fatality that had occurred in November 2024 to understand its status and link to GCF-financed activities. The IRM understood that the site of the drowning was no longer used as part of the GCF project, even though the project financed the initial construction of the water retention facility. Per local representatives, the site had been removed from use as part of the project due to the discovery of hard bedrock that made further construction reportedly unfeasible in the surrounding area. Instead, fishponds and water retention facilities were constructed in a neighboring area, directly opposite the original project site and across a major road. The IRM noted that all sites in the locality (in use and not in use) were fenced off at the time of the IRM visit. The IRM heard from stakeholders that construction of fences at the project sites still in use had commenced late the previous year, following directions from relevant government agencies to secure the sites from accidental entry.

Prima Facie Findings

40. Since the standard of proof required in a preliminary inquiry is of a *prima facie* nature, the IRM is fully cognizant of the fact that these findings may be contradicted by facts and information revealed in a fuller investigation. The GCF Secretariat and other stakeholders have not had the opportunity to view or respond to each of the IRM's findings against the criteria, and the IRM has not conducted a comprehensive fact-finding, beyond information obtained through public and internal documentation and IRM missions.

41. A *prima facie* finding is one that is made at a preliminary stage of a proceeding on the basis of readily available evidence and with a view to progressing to the next stage of a proceeding. It is by no means conclusive on the facts. The evidence reviewed in this preliminary inquiry led the IRM to the *prima facie* conclusion that the criteria for initiating proceedings under paragraph 12 of the IRM's TOR had been met. These criteria are considered below in turn.

Is there credible information?

42. The documentation triggering this preliminary inquiry are assessed by the IRM as credible. The primary source of information on the risks and impacts related to the construction, operation and maintenance of the infrastructure works is project documentation, both internal and public. The risks highlighted by these documents is further borne out through eyewitness testimony, audio-visual evidence and interviews conducted by the IRM with affected communities living near these project sites.

43. The evidence reviewed in this preliminary inquiry leads the IRM to the *prima facie* conclusion that information related to community health safety and security risks, impacts and mitigation measures is credible.

Are there adverse impacts from the project?

44. There have been three fatalities recorded at sites financed by the GCF project. In two of the three cases, the IRM has reasons to believe fencing was inadequate or absent, to the extent that drownings occurred in the construction phase of the sites. In the two IRM cases, neither purported to remedy the loss of life, noting in one case at least, that the resolution explicitly did not address loss of life. The IRM does not have sufficient information to determine if there may have been other serious incidents of near-drownings or injury in GCF-financed sites. The IRM

has not made efforts to conclusively determine if the remedial measures put in place and overseen by GCF, UNDP and MWE are satisfactory in ensuring sustainability of interventions, preventing continued adverse impacts to project-affected communities. Potential adverse impacts need to be assessed further, given the ongoing concerns related to compliance with safeguarding systems.

There is accordingly *prima facie* evidence of adverse impacts linked to the GCF project.

Is there a significant reputational risk to GCF?

45. Given that project documentation prior to the first drowning incident warned of potential risks to vulnerable populations (i.e. minors) posed by the construction and operation of water retention facilities and fishponds, absence of an analysis of independent and impartial investigation into the circumstances leading to these serious incidents could pose serious reputational risks to GCF.
46. The inconsistencies and/or deficiencies in ensuring site-specific safeguarding systems *prima facie* points to lack of adequate project monitoring and supervision which could pose a significant reputational risk to the GCF if such incidents re-occur. Additionally, the quality and robustness of APR reporting for this project and subsequent follow-up by the GCF Secretariat point to potential gaps in institutional monitoring arrangements that, if not assessed independently and corrected, could pose risks in other areas of GCF programming, increasing reputational risks to the GCF.

There is accordingly *prima facie* evidence of significant reputational risk to the GCF.

Are the affected persons unable to access the IRM?

47. The primarily affected persons are deceased and are therefore unable to access the IRM. The inquiry may end here, as the burden to access the IRM neither automatically nor fully shifts to the family or community of deceased individuals.
48. That being said, the IRM notes that two of the victims' families entered into problem solving processes with the IRM Dispute Resolution (DR) function. In the present *Suo Moto* inquiry to consider whether to proceed with a compliance review, the IRM determines that these families were under no obligation to pursue any or all IRM processes on behalf of their deceased relatives, and the fact that they accessed the IRM to secure support for their own immediate needs does not render the affected persons "able" to access the IRM.
49. Families highlighted the psychological and resource burdens that formally pursuing a compliance process would impose on them. Additionally, the IRM assessed risks of retaliation to be high and consequently, determined that this limited affected families ability to proactively trigger an investigation.

Given the above, there is *prima facie* evidence that affected persons are unable to access the IRM.

Next steps

50. The IRM notes that the Secretariat has extensively engaged with the AE and EE to implement measures to address social and environmental safeguarding risks that have surfaced as a result of IRM casework and subsequent GCF Secretariat monitoring of the project, outside of routine project oversight and supervision. The IRM further notes that a restructuring of the project was approved at B.45 in July 2026, in part to address risks related to community health, safety and security. The restructuring proposal proposed the following: *“An environmental and social action plan (ESAP) is proposed in the context of the restructuring proposal to strengthen compliance of the funded activity with the applicable environmental and social standards. The ESAP has proposed enhanced monthly to quarterly monitoring by MWE with oversight from UNDP, reinforced measures on community health and safety such as the maintenance of installed perimeter fences and signage to deter unauthorized entry to communities to prevent any safety risks and provided a dedicated budget that is inclusive of the GRM.”*²⁷
51. Notwithstanding the aforementioned remedial measures to restructure the project and address identified safeguarding gaps, the IRM believes that a self-initiated proceeding would be necessary to ensure that efforts regarding the sustainability of project interventions and compliance with applicable GCF policies and procedures are independently assessed as satisfactory and appropriate. The IRM proposes that a compliance review of the circumstances that contributed to the non-compliance of the project with community, health safety and security safeguards would be critical in ensuring that measures undertaken by parties are commensurate to the scale and scope of the identified risks and impacts. A remediation exercise absent an impartial and independent investigation of the circumstances contributing to non-compliance, especially prior to 2025, could potentially result in measures that are insufficient to prevent reoccurrence of such severe incidents.

Referral to Compliance Review

52. The IRM notes that dispute resolution processes were already deployed to address immediate needs of affected families and bring about resolution to some of the concerns raised as part of IRM Case C-0011 and IRM Case C-0012. The IRM notes that these processes did not look into the facts or circumstances of non-compliance that may have contributed to the adverse impacts experienced by the affected persons. The IRM is therefore referring the potential issues of non-compliance with safeguarding policies, as it relates to the three fatalities reported in GCF-financed project sites, to compliance review for further processing.
53. In accordance with paragraph 51 of the PGs, the IRM will, within 14 days, forward the grievance or complaint (duly redacted if necessary) to the Executive Director of the GCF Secretariat with a request for a formal response. The GCF Secretariat will have 21 days from the date of the request to respond to this report, after which the IRM will prepare a compliance appraisal report determining whether there is prima facie evidence that the identified potentially affected persons have been affected or may be affected by adverse impacts through non-compliance of the GCF-funded project or programme with GCF operational policies and procedures and prepare a compliance appraisal report. For further information, please refer to paragraphs 50-70 of the IRM's Procedures and Guidelines.

²⁷ See p. 5: [11-consideration-funding-proposals-consideration-request-changes-scope-funded-activity-fp034.pdf](#)