

Redress



Independent
Redress
Mechanism

Independent Redress Mechanism

Grievances and Complaints

Eligibility Determination

GCF Project FP203: Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals

IRM Case C-0018 Colombia

2 February 2025

Eligibility Determination

The Terms of Reference (TOR)¹ and the Procedures and Guidelines (PGs)² of the Independent Redress Mechanism (IRM) sets out how the IRM deals with grievances or complaints from a person, group of persons, or community who have been, or may be affected by the adverse impacts of a GCF funded project or programme. Once a grievance or complaint is received and registered by the IRM, the PGs require the IRM to determine if the grievance or complaint meets the eligibility criteria set out in paragraphs 20 – 21 and 23-24 of the PGs of the IRM. It is to be noted that this determination is procedural, and that it does not represent a judgement on the merits or the substance of the case.

SUMMARY OF ELIGIBILITY DETERMINATION

For reasons substantiated in greater detail in this document, the IRM determines that this grievance/complaint is eligible under the IRM's TOR and PGs.

BACKGROUND

On 12 December 2025, the IRM registered a complaint pertaining to GCF Project FP203 “Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals.” The complainant states that they were formerly employed under the GCF Project, working within one of the Executing Entities. The complainant has requested confidentiality, which has been granted in accordance with the IRM's Terms of Reference and Procedures and Guidelines.

GCF Project FP203 aims to introduce a paradigm shift in Colombia's approach to sustainable management of ecosystems. The project is intended to accomplish this via a public-private partnership model that seeks to secure financing in perpetuity for the management of key ecosystems and large-scale landscapes across the country. FP203 was approved during the 35th meeting of the GCF Board on 16 March 2023. The Accredited Entity (AE) of this Project is the World Wildlife Fund, Inc. The Project is ‘Under Implementation’ with an expected completion date of 14 July 2033.³

The complainant alleges experiencing a series of inappropriate behavior, including incidents of harassment and gender-based violence that she stated occurred in her workplace during her employment with the relevant Executing Entity. As confidentiality has been requested and granted, the IRM is providing a summary of the concerns raised. The complainant alleges the following:

- 1) Instances of inappropriate behavior in the workplace, amounting to a hostile work environment;
- 2) Ineffective implementation of the Executing Entity's Protocol for the Prevention of Gender-Based Violence and Sexual Harassment;
- 3) Lack of effective action in response to the filing of a formal complaint with the Executing Entity regarding the aforementioned incidents;

¹ Available at: <https://irm.greenclimate.fund/document/irm-tor>

² Available at: <https://irm.greenclimate.fund/document/2019-procedures-and-guidelines-irm>

³ [FP203: Heritage Colombia \(HECO\): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals](#)
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- 4) Adverse impacts to well-being as a result of workplace-related incidents, including psychological damage, impairment of dignity, revictimization and loss of income; and
- 5) End of contractual relationship between complainant and the Executing Entity due to inaction and lack of remedy with regard to allegations of an unsafe or hostile work environment.

During the phase of eligibility determination, the IRM reviewed relevant project documents and engaged with stakeholders to understand the relevance of concerns raised to the GCF Project. On the basis of the above, the IRM *prima facie* concludes that the eligibility criteria, as set out in more detail below, have been met.

ELIGIBILITY CRITERIA

The IRM examined the eligibility of the complaint/grievance against the eligibility criteria set out in paragraphs 20 – 21 and 23-24 of the PGs of the IRM. The primary eligibility criteria and the IRM's findings in relation to these criteria are set out in the table below.

| Criterion | Does the grievance or complaint meet the criterion? | Reason(s) |
|--|---|--|
| Was the grievance or complaint filed by a person, group of persons, community (or any duly authorised representative of the aforementioned groups) who have been or may be affected by the adverse impacts of a GCF funded project or programme? | Yes | The complainant is a worker engaged by a third party whose work is linked to core business processes under the Project. As set out above, <i>prima facie</i> , complainant experienced adverse impacts linked to their employment under a GCF funded project or programme. |
| Was the grievance or complaint submitted to the IRM before whichever is the later of the following two dates: (a) Two years from the date the complainant becomes aware of the adverse impacts referred to in paragraph 20 of the PGs; or (b) two years from the closure of the GCF funded project or programme. | Yes | The complaint was registered on 12 December 2025. At the time of submission, the project was under implementation. The complaint was accordingly submitted to the IRM before the later of the dates mentioned in paragraph 23 of the IRM's PGs. |

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|--|----|---|
| Does the grievance or complaint fall into any one or more of the exclusions listed in paragraph 24 of the PGs? | No | None of the exclusionary criteria appear to be triggered by this complaint. |
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ELIGIBILITY DETERMINATION

For the reasons stated above, the IRM determines that this grievance or complaint is **eligible** under the IRM's TOR and PGs. The IRM will now engage with the complainant to understand the issues in the complaint and to provide further information on the next steps available to process the complaint. For further information on the process that the IRM will follow, please refer to paragraph 36 of the PGs.

[Signed]

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