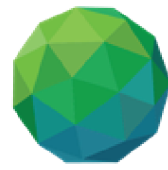


Redress



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Independent Redress Mechanism

Grievances and Complaints

Initial Steps Report

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

IRM Case C-0012-Uganda

19 June 2025



Initial Steps Report

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 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 has been declared eligible, the IRM, as part of its initial steps, holds discussions with the complainants and potential parties to understand the issues at hand, explains the processes of the IRM, and determines whether the parties wish to proceed with problem solving or compliance review or a combination of both. Under the IRM terminology, this phase is called the “initial steps phase.”

In this phase of the process, the IRM does not gather information to determine faults or make judgments on the merits of the complaint. The objective of this report is to collect parties’ perspectives on the alleged concerns. This report does not intend to substantiate any of the allegations or perspectives.

This report documents the initial steps described above as well as its outcome.

SUMMARY OF OUTCOMES

On 11 January 2025, the IRM registered a complaint concerning a fatal drowning incident in south-western Uganda with potential relevance to GCF-funded project FP034, “Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda” (FP034).³ The complainants requested and were granted confidentiality in accordance with the PGs and TOR.

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 targets 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 2026. The Accredited Entity (AE) for this Project is the United Nations Development Program (UNDP). The leading Executing Entity (EE) for this project is the Ministry of Water and Environment (MWE) of the Republic of Uganda. Other entities, including the Ministry of Local Government (MoLG), National Environment Management Authority (NEMA) and District Local Governments, also work in close collaboration with MWE.

The complaint relates to a drowning incident of an 8-year-old girl that occurred in March 2023 in South-Western Uganda. The incident took place at a water retention facility or ‘pond’ that was under construction and located adjacent to wetlands.

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

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

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

According to eyewitnesses, the young girl was looking after goats grazing in the area and is said to have entered the pond to retrieve a goat that had strayed into it. Per interviews conducted by the IRM team, at the time of the incident there weren't any fences in place to prevent access to the area. The IRM team visited the site of the incident and spoke with affected community members to ascertain relevance and potential linkages to GCF project sites. Through a review of project documentation and information that included eyewitness accounts, the IRM was able to confirm that several GCF project activities and stakeholder engagements, in and around the sub-county and wetland system, had been under implementation around that time period.

The IRM further assessed that the pond or water retention facility was initially intended to be a part of livelihood-support activities being implemented under GCF Project FP034. The current status of the site is uncertain, but in documents viewed by the IRM, the site was previously classified as "abandoned". Notwithstanding the present status of the site, the IRM's assessment suggested strong linkages to GCF project activities. The IRM determined the complaint to be eligible on 10 February 2025.⁴

Consequently, the IRM started engaging with the complainants and other stakeholders in the initial steps phase to better understand the issues in the complaint and to provide further information on the two complaint handling modalities, as indicated in paragraph 36 of the IRM PGs. During the initial steps phase, the IRM does not gather information to determine the merits of the complaint or assess any compliance-related matters. Its objective is limited to better understanding parties' perspectives and determining whether the complaint could be processed through dispute resolution.

The deadline for the initial steps was due to lapse on 11 April 2025, but this deadline was extended⁵ to 9 June 2025 at the initiative of the IRM to provide additional time to structure and promote collaborative working arrangements with the accountability mechanism of the Accredited Entity.

CASE-RELATED ENGAGEMENTS

In January 2025, an IRM team travelled to relevant sites in Uganda and met with a number of stakeholders, including the Executing Entity and UNDP. Engagements with the GCF Secretariat, Accredited Entity and Executing Entity occurred virtually and in-person after the mission. During the mission, the IRM team travelled to the site of the incident in the relevant district in South-Western Uganda and met with community members living in and around the water retention facility. The IRM further engaged with complainants to understand their perspectives about the GCF Project and the timeline of events leading up to the fatal drowning incident and its aftermath. As part of this process, the IRM provided information on the complaint-handling options to all parties involved. The IRM team clarified that its role was not to assess the merit of allegations or assess the project's performance.

The IRM's visit to the site of the incident revealed that the area continued to be in a

⁴ [determination-eligibility-c0012-uganda.pdf](#)

⁵ [c0012-uganda-irm-extension-time-decision-initial-steps.pdf](#)

state of abandonment and disrepair. Community members recalled various stakeholder meetings occurring in and around their village and wetland system, from mid-2022 to early 2023. Starting in January 2023, community members allege that local authorities prevented them from cultivating in the wetland system. The community expected to receive some alternate livelihood options but were not informed of the timeline or specific quantities of livelihood alternatives that would be provided for each family. The digging of the water retention facility reportedly commenced in February 2023, with the use of an excavator.

At the time of the incident, the deceased's parents stated that they were working as day laborers outside of the village. They claim they needed to engage in this work to compensate for lost income and increased food insecurity due to restricted access to wetlands. The mother of the deceased reported that in the past she would usually practice subsistence cultivation in wetland areas near the village while taking care of her children. The family further mentioned that they had been promised alternative livelihoods but had not received them at that time. As a result, the mother sought employment away from home and stated that caretaking duties for the younger children were subsequently assumed by the oldest child in the family, a fourteen-year-old sibling of the deceased.

The IRM team was notified that following the drowning incident, some officials from the district had been in contact with community members and the affected family. The IRM was made aware that in the immediate aftermath of the incident, community members were deeply concerned about the lack of fencing at the site and had repeatedly requested authorities to rectify the situation. A fence was reportedly put in place some weeks after the incident but at the time of the IRM visit, the fencing was in a state of disrepair, with large swathes of land visibly unfenced as a result of exposure to flooding and erosion from the surrounding wetland areas.

Complainants highlighted several adverse impacts they experienced as a result of the delay and/or halting of project activities in their village and wetland system. The complainants report that the provision of alternative livelihoods was halted at an unspecified time in 2023. In early 2024, community members interviewed by the IRM reported that the construction of a bridge in a nearby area resulted in the diversion of a river, causing flooding to the wetland areas surrounding their village, potentially rendering the lands unusable for either cultivation or wetland restoration. Many community members the IRM spoke with raised questions about whether the village and wetland system could still be considered part of the GCF Project's scope of activity, given that much of the land previously marked for restoration appeared to be inundated.

In conversations with the Executing Entity, the IRM gathered information about the scale and scope of interventions in the relevant district and area. The EE confirmed to the IRM that the village had initially been identified as part of the wetland restoration activities but following technical assessments, the sites were no longer included as part of locations for interventions under the GCF Project. Both the EE and community members confirmed some provision of alternative livelihoods, but it remains unclear when and how a decision was made to remove the village and nearby wetland areas from the official scope of Project activities.

The IRM observed differences in perspectives surrounding the facts of the drowning incident, including the extent of provision of support provided to the affected family. The IRM notes that complainants and relevant authorities confirmed that some financial support had been provided to cover the costs of the burial. The Executing Entity further noted the provision of beehives to the affected family. At the time of writing this report, the specific project activities that may be implemented or may continue to be implemented in this wetland system and/or surrounding affected communities is yet to be determined. The IRM provided information to all relevant stakeholders on the choice of complaint modalities, to ascertain the best path forward in terms of addressing the concerns raised in the complaint.

Following numerous engagements with the IRM, both in person and virtually, complainants indicated that dispute resolution was their preferred choice of process for handling the complaint. The IRM further confirmed that the Executing Entity was also willing to engage in a dispute resolution process with an aim to arrive at a mutually satisfactory agreement that addresses concerns raised in the complaint. Throughout the process, the GCF Secretariat and UNDP have been provided with updates regarding the case processing. The GCF Secretariat and UNDP have the option to participate in the ensuing problem-solving phase. A problem-solving plan which further elaborates on timelines, agendas and roles will be developed and consented to by all parties involved.

Problem-solving is a flexible and participatory process focused on assisting parties in finding and/or developing an effective solution to the concerns raised by the complainants. A problem-solving process focuses on addressing the concerns that gave rise to the grievance or complaint in a way that meets the interests of the complainants and the other potential parties in the process 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 and protected space. All information used in a problem-solving process by the parties is held in confidence by the dispute resolution team and will not be used in any future IRM processes, including compliance review.

GENERAL OBSERVATIONS, CHALLENGES AND EXPECTED DEVELOPMENTS

The IRM notes that following the notification of two complaints related to fatal drowning incidents (IRM Case C-0011-Uganda and IRM Case C-0012-Uganda) the GCF Secretariat has been in contact with the Accredited Entity and Executing Entity in order to identify and remediate issues highlighted as part of the Secretariat-led enhanced monitoring process. The IRM complaints-handling process is occurring parallel to other Secretariat-led processes, with an eye to ensure there is an exchange of information on substantive case-related updates, for the purpose of efficiency and transparent communications and to ensure any adverse risks or impacts to project-affected communities are immediately identified and remediated.

Nonetheless, during the mission, the IRM was made aware of several potential concerns in terms of assuring the robust management of environmental and social safeguards risks related to project implementation. A formal and functioning system

for handling grievances at the project-level is a key tool for identifying and mitigating risks to communities. In the circumstance where project affected communities may be unable to access a project-level grievance mechanism, the IRM urges relevant entities to make information available on the existence of grievance redress mechanisms at all levels, including at the level of the AE and GCF.

NEXT STEPS

As the parties have agreed to pursue problem-solving as a first attempt to resolve the issues raised in the complaint, the IRM will now work with the parties to establish a problem-solving plan, including a reasonable timetable and structure for an effective process. The IRM has already engaged experts in community-project relations and knowledge about the regional context. The IRM will identify any further resources that may be necessary for an effective problem-solving process.

The problem-solving process should ordinarily be completed within one year of the parties' agreement to pursue it unless an absolute need for an extension arises and is agreed upon by the parties and the IRM. The IRM hopes that the parties reach an agreement sooner. Once an agreement is reached, the IRM will inform the GCF Board of the result and will monitor the implementation of the agreement.

In accordance with the Principles for Cooperation among Independent Accountability Mechanisms (IAMs),⁶ the IRM has engaged with the accountability mechanisms of the UNDP to inform them of the receipt of the complaint and substantive steps in case-processing. If deemed necessary and consented to all by parties, the IRM will promote cooperation between mechanisms to encourage efficient and effective joint case-processing. Notwithstanding the above, the IRM reserves its rights to self-initiate processes to ascertain systemic issues pertaining to non-compliance with GCF Policies and Procedures, with a view toward ensuring this project continues in a manner compliant with applicable social and environmental policies and to promote institutional learning.

[Signed]

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⁶ Accessible here: <https://thedocs.worldbank.org/en/doc/3043c724b44d475060e19be691c1a0ae-0490092016/original/IAMnet-Criteria-for-Participation-and-Principles-for-Cooperation-september-2016-ENGLISH.pdf>