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Grievances and Complaints Initial Steps Report

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

IRM Case C-0013-Uganda

12 September 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 impacts. 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 March 2025, the IRM acknowledged receipt of a complaint filed by wetland-dependent communities residing in Rukungiri district in south-western Uganda with potential relevance to GCF-funded project FP034, “Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda.”³ The complainants are represented by a civil society organization, the Health and Equity Policy Initiative (HEAPI). 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 Executing Entity (EE) for this project is the Ministry of Water and Environment (MWE) of the Republic of Uganda.

The complaint relates to events surrounding the implementation of the project in the Nyambabi wetland system in Rukungiri district that occurred in November 2023.⁴ The complainants allege several adverse impacts including (i) violation of property rights of

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>

⁴ The redacted complaint is available at: <rukungiri-gcf-complaint-redacted.pdf>

wetland-dependent communities; (ii) destruction of homes, crops, trees and plantations; (iii) forced displacement of wetland-dependent communities in the presence of security forces; and (iv) non-provision of alternative livelihood support.

The IRM determined the complaint to be eligible on 10 April 2025.⁵ 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 problem-solving.

In May 2025, the complainants also filed their complaint with the accountability mechanism of the Accredited Entity, UNDP (the UNDP Accountability Mechanism, or AM). The UNDP AM also has an initial phase through which to determine process choice by the complainants. For the purposes of efficient and effective case-processing and with the consent of complainants, the IRM and UNDP AM jointly conducted meetings with all parties in the Initial Steps Phase.

The deadline for the initial steps was due to lapse on 9 June 2025, but this deadline was extended initially⁶ to 18 July 2025 and finally through 31 August 2025⁷ to provide the IRM additional time to structure working arrangements and to ensure safe and secure engagements with complainants and their representatives.

CASE-RELATED ENGAGEMENTS

At the time of submission, the IRM received numerous materials including a complaint letter, audio-visual materials, and additional documentation pertaining to the adverse impacts experienced by affected community members. The IRM team attempted to meet complainants in-person but was unable to do so given the lack of assurance from relevant authorities that safe passage could be guaranteed to IRM team members, complainants and their representatives who would have been travelling to and within the district. In lieu of an in-person meeting, the IRM team was able to connect with complainants via other means to obtain additional perspectives and views on the issues raised in their complaint.

In their complaint letter, complainants alleged that in November 2023, they were contacted by government authorities to participate in a series of meetings to discuss restoration of the Nyambabi wetland system which adjoined numerous parishes and sub-counties in Rukungiri District. Complainants claimed that they were initially led to believe that only a limited area would be affected by the wetland restoration activities. However, they added that not long after this initial meeting, security personnel arrived at various villages, accompanied with heavy construction equipment such as bulldozers, to clear the land of any crops or other agricultural products and install concrete pillars to serve as demarcation poles to identify areas marked for wetland restoration. Complainants explained that authorities further notified some community members that

⁵ <https://irm.greenclimate.fund/sites/default/files/case/determination-eligibility-c0013-uganda.pdf>

⁶ [c0013-uganda-irm-extension-time-decision-initial-steps.pdf](#)

⁷ [c0013-uganda-second-irm-extension-time-decision-initial-steps.pdf](#)

any structures within wetland demarcated areas would have to be vacated or risk being demolished. Several complainants raised issues such as lack of prior notice of planned demarcation activities and not being aware that the areas they occupied and used for cultivation were protected wetland areas. Complainants reported not receiving compensation for the destroyed crops and livelihood sources and further, not receiving alternate livelihood options.

The IRM team engaged with complainants and complainant representatives to elaborate on potential ways the IRM could help address their concerns. Complainants, via their representatives, indicated mediation and/or problem-solving as the preferred modality to address the issues raised in the complaint.

In early conversations with the Executing Entity, the IRM observed a hesitation to engage in dialogue or conversation with the IRM and UNDP AM processes given that the complainants and complainant representatives were already potentially parties to court cases filed in Rukungiri High Court, pertaining to the same issues. The IRM sought to clarify that the IRM process does not foresee or anticipate any barriers for complainants to seek remedies via local courts in addition to the accountability mechanisms of the GCF and/or accredited entity and sought to gather more information on the feasibility of undertaking a problem solving initiative in the context of these concerns.

The IRM observed that the Executing Entity, while supportive and open to problem-solving, had initial reservations about their ability to engage in both processes before court and within the IRM process. The IRM sought to convene a meeting with relevant stakeholders, including complainant representatives and legal representatives of the Executing Entity, to explore the options available to consider the case under the problem solving option in a manner that would not be disruptive or limiting in terms of ensuring the full participation and commitment of all stakeholders. Following a meeting between key stakeholders, representatives of the complainants and the Executing Entity agreed to voluntarily engage in a problem-solving initiative facilitated by the GCF IRM and UNDP Stakeholder Response Mechanism (SRM) and work together towards resolving the complainants' concerns. Given the ongoing court proceeding, parties indicated to the IRM that they would have to formally notify relevant legal authorities in Uganda about their attempt to reach a settlement outside of the court system with the support of the IRM and the UNDP's SRM.

At the conclusion of the Initial Steps Phase, the IRM was able to confirm that all parties are willing to engage in a problem-solving process with the aim of arriving at a mutually satisfactory agreement that would address the concerns raised in the complaint. Throughout the process, the GCF Secretariat and UNDP have been provided with updates regarding the case processing. IRM will continue engaging with the GCF Secretariat and UNDP as the case progresses to the problem-solving stage and will look into options to ensure their participation in the problem-solving stage after consulting with relevant parties. 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 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 any potential compliance review.

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 and UNDP SRM 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 with knowledge about the regional context based on its experience and lessons learnt from other cases in Uganda on this project. The IRM will identify any further resources that may be necessary for an effective problem-solving process in consultation with parties. In accordance with the Principles for Cooperation among Independent Accountability Mechanisms (IAMs),⁸ the IRM has engaged with the accountability mechanisms of the UNDP to coordinate substantive steps and encourage efficient and effective joint case-processing.

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.

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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⁸ Accessible here: <https://thedocs.worldbank.org/en/doc/3043c724b44d475060e19be691c1a0ae-0490092016/original/IAMnet-Criteria-for-Participation-and-Principles-for-Cooperation-september-2016-ENGLISH.pdf>