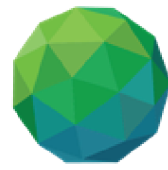


# Redress



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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-0011-Uganda**

**27 June 2025**

## Initial Steps Report

The Terms of Reference (TOR)<sup>1</sup> and the Procedures and Guidelines (PGs)<sup>2</sup> 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

On 15 November 2024, the IRM received and acknowledged receipt of a complaint concerning a fatal drowning incident in south-western Uganda. The complainants are family members of the deceased. The complainants have not requested confidentiality but as a result of the IRM’s risk assessments, and in accordance with the PGs and TOR, the IRM is withholding the identity of complainants in external communications.

The complaint relates to a drowning incident that occurred on 29 September 2024 in Rukiga District in Uganda. The incident involves a 17-year-old boy who was reportedly engaged in informal labor around wetland areas in Bukinda Sub-County, Rukiga District. The incident occurred at a water retention facility that was under construction, and part of livelihood-support activities being implemented under the GCF-funded project FP034, “Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda” (FP034).<sup>3</sup>

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 15<sup>th</sup> meeting of the GCF Board on 15 December 2016, and the estimated completion date for FP034 is 31 December 2026. The Accredited Entity (AE) for this

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

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

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

project is the United Nations Development Programme (UNDP). The 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.

## **BACKGROUND TO THE COMPLAINT**

On 28 October 2024, the IRM was notified of a fatal drowning incident that was alleged to have occurred at a GCF Project site where a water retention facility was reportedly under construction. The IRM was further alerted that the site continued to pose risks to community health, safety and security due to the lack of adequate safety measures (such as fencing and warning signs) to prevent accidental drowning. Noting the severity of risks raised to project-affected communities, the IRM formally notified the GCF Secretariat of the incident on 30 October 2024 and urged that immediate steps be taken to mitigate any ongoing risks and hazards that may be prevalent in and around this site.

The IRM carried out an initial fact-finding exercise to assess the linkages between the reported incident and activities occurring as part of GCF Project FP034. During engagements with stakeholders and eyewitnesses knowledgeable about the incident, the IRM was connected to the family members of the deceased, who subsequently indicated their desire to formally file a complaint with the IRM. The IRM received the complaint on 15 November 2024 and determined the complaint eligible under its TOR and PGs.<sup>4</sup> During eligibility determination, the IRM gathered and examined information from complainants and community members. Information that was examined included eyewitness accounts of individuals who were present at the aftermath of the incident. The IRM was able to further verify, through audio-visual data and corroboration from relevant project related documents, that the location of the water-retention facility overlapped with sites for GCF Project-related interventions.

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 13 February 2025, but this deadline was extended<sup>5</sup> to 15 April 2025 at the request of relevant stakeholders to provide additional time to discuss and agree upon preliminary actions that could address immediate needs raised as part of the complaint. The deadline for initial steps was extended a second time through 9 June 2025 following concerns raised

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<sup>4</sup> The Eligibility Determination is available at: [determination-eligibility-c0011-uganda.pdf](#)

<sup>5</sup> [c0011-uganda-irm-extension-time-decision-initial-steps.pdf](#)

around the technical feasibility of some of the agreed upon actions.<sup>6</sup>

## **INITIAL STEPS 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 occurred prior to and subsequent to the mission at GCF offices in Songdo, South Korea. During this mission, the IRM team travelled to site of the incident in Rukiga District and met with community members living in and around the water retention facility site. The IRM further visited complainants and gathered perspectives on the adverse impacts that were being experienced as a result of the loss of life. Further, the IRM met with the staff of the Executing Entity and Accredited Entity in the capital city, Kampala. As part of this process, the IRM provided information on the complaint-handling options to all parties involved. In all IRM's engagements with the parties, the IRM team clarified that its role was not to confirm the merits of the allegations or assess the project's performance.

The IRM team met with complainants at their homestead located in a neighboring district. The complainants comprised immediate family members of the deceased. The IRM determined that the complainants were not located within the project sphere of influence, and as such, had no knowledge of or awareness of the GCF Project or its intended interventions. In meetings, the complainants highlighted several adverse impacts being experienced by the immediate family of the deceased. These include (i) loss of access to water; (ii) loss of primary caregiver to an elderly family member; (iii) inability to continue ongoing construction works to renovate house of the elderly family member; (iv) increased risks to safety to an 8-year-old sibling of the deceased (who had assumed responsibility as primary caregiver and water carrier for the elderly family member).

As part of the initial steps phase, the IRM explained the complaints modalities i.e. problem-solving or compliance review available to complainants to process the complaint. During engagements with the IRM team, complainants repeatedly emphasized a request for immediate relief to alleviate some of the adverse impacts being experienced by the family, including assistance to provide water to the elderly family member.

Additionally, the IRM visited the site of the incident in Rukiga District and was able to verify the safety measures that had since been installed around the water retention facility. The facility was situated in a wetland approximately 100 meters from the nearest road. The facility's design, featuring a steep drop-off and an uneven, muddy slope, seemingly heightened drowning risks due to its depth of up to 10 meters in certain areas. In the weeks subsequent to the notification of the incident by the IRM to the GCF Secretariat, the site had been secured with additional safety measures. Concrete pillars and metal fencing at a raised height were installed to prevent access. The gates to the entrance of the water retention facility were secured with a lock and key that was entrusted to members of the community and signs had been erected to warn against the risks of drowning.

Community members reported to the IRM that children residing nearby, who faced the greatest risk of accidental drownings, had been instructed not to play in and

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<sup>6</sup> [c0011-uganda-irm-second-extension-time-decision-initial-steps.pdf](#)

around the site. Community members further noted that while residents of the sub-county had been made aware of the construction of the facility and its potential risks, workers from outside the district (as was the case for the deceased) would not have benefited from the same sensitization activities. The IRM received conflicting information on the adequacy of fencing at the time of the incident. Some community members reported the existence of a safety ribbon surrounding the perimeter of the facility, whereas other accounts suggested the lack of any safety measures, save a raised embankment to distinguish the facility from its surroundings. At this stage in the process, the IRM did not seek to conclusively establish facts as it relates to the circumstances leading up to the drowning incident and instead gathered perspectives on issues of community health, safety and security from those residing in and around the site.

Following this initial meeting, the IRM further engaged with the Accredited Entity for the Project (UNDP) and the Executing Entity (Ministry of Water and Environment Uganda) to provide information on the complaint and to share the complainants' request. Through these engagements, the IRM assessed that the requests made by complainants could be addressed via cooperative agreement and action on some key activities to ameliorate the adverse impacts. The GCF Secretariat further appraised the IRM of its own processes to identify and address project implementation related concerns, including those pertaining to environmental and social safeguarding risks. Given the above, the IRM further assessed that complainants would be amenable to an early resolution of the concerns raised in the complaint, provided an agreement could be reached and implemented within the Initial Steps Phase of the process.

The IRM facilitated engagements with complainants and representatives of the Executing Entity. On 23 January 2024, representatives from the district and relevant agencies, including a technical staff, visited the homestead of the complainants to assess feasibility of the requested assistance. Following this initial visit, the IRM facilitated conversations between the Ministry of Water and Environment and the complainants to arrive at an agreement with activities and timelines detailed, for the purpose of reaching a resolution to the immediate concerns raised. The agreement text encompassed certain relief measures, such as efforts to address the immediate adverse impacts stemming from the loss of access to water and its associated impacts to vulnerable members of the family. On 13 March 2025, an agreement was reached, with facilitation provided by the IRM, between the complainants and the Executing Entity to deliver on key activities prior to the conclusion of the Initial Steps Phase.

The agreement stipulated that activities outlined in the complaint would be completed no later than 13 April 2025. However, in the week prior to the Initial Steps Phase deadline, the IRM was made aware of difficulties in implementing one or more agreed upon actions following additional technical studies and reports that were conducted by the Executing Entity. The IRM team, with the consent of all parties, agreed to an extension of time to allow for a re-negotiation of the initial agreement and proposed activities, with a view to reach a resolution by the new deadline of 9 June 2025.

The IRM team has verified that the initial agreement has been modified, with the knowledge and informed consent of complainants, and all agreed upon actions have been completed within the agreed upon deadlines. Complainants have expressed their satisfaction with the implementation of the agreement and have communicated to the IRM that their complaint can be closed.

## **GENERAL OBSERVATIONS, CHALLENGES AND EXPECTED DEVELOPMENTS**

The IRM notes that following the notification of this initial complaint and a subsequent complaint registered by the IRM (IRM Case C-0012-Uganda) of a fatal drowning incident involving a minor that occurred in March 2023, the GCF Secretariat has been in contact with the Accredited Entity and Executing Entity on identifying and remediating 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 its missions to the site of the incidents, the IRM was made aware of several potential concerns in terms of assuring the robust management of environmental and social safeguards risks associated with 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**

In light of the early resolution process described above, the IRM determines that there is no need to further engage complainants in a formal problem-solving process or pursue remedy through a compliance review process. This is without prejudice to the right of the complainant to again access the IRM in case new matters arise that have not been concluded by the IRM or new material information or evidence is submitted that was not available at the time the matter was previously considered by the IRM. The IRM additionally 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.

For the reasons mentioned above, the IRM determines that the Initial Steps Phase has concluded and the case will be closed without further processing.

*[Signed]*

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