

Redress



GREEN
CLIMATE
FUND

Independent
Redress
Mechanism

Compliance Appraisal Report

Case C-0023 – Uganda

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

24 September 2026

ABOUT THE INDEPENDENT REDRESS MECHANISM

The Independent Redress Mechanism (IRM) is an accountability and redress mechanism established by the Green Climate Fund (GCF) to increase the effectiveness of the GCF's operations, and to be responsive to the concerns of people adversely affected by GCF funded projects or programmes.

The IRM is mandated to receive and consider complaints from people who believe they have been, or may be, adversely impacted by GCF projects or programmes failing to implement GCF policies and procedures.

The IRM is independent of the GCF Secretariat, and reports directly to the GCF Board, which oversees GCF's investments and management.

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I. EXECUTIVE SUMMARY

II. INTRODUCTION

1. This report documents the Green Climate Fund (GCF) Independent Redress Mechanism (IRM) compliance appraisal in IRM Case C-0023- Uganda. It concerns IRM-initiated proceedings¹ into three fatal drowning incidents involving minors at water retention facilities associated with GCF project FP034, "Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda."²
2. The IRM initiated proceedings in accordance with paragraph 12 of the IRM's Terms of Reference (TOR)³ after concluding that the three criteria had been met i.e. the IRM concluded there was *prima facie* evidence that there was credible information related to community health, safety and security risks and adverse impacts to project-affected communities linked to the implementation of GCF Project FP034, that such adverse impacts and risks pose a significant reputational risk to the GCF and that affected persons were unable to access the IRM. Following the decision to initiate proceedings, the IRM proceeded to initiate a compliance review into the reported fatalities linked to GCF Project FP034.
3. This compliance appraisal report provides a background to GCF Project FP034 and to the IRM-initiated proceedings; describes relevant GCF operational policies and procedures; and assesses whether there is *prima facie* evidence of adverse impacts through non-compliance of the Project with GCF operational policies and procedures. Since the IRM concludes that there is such evidence and initiates a compliance investigation, the report also includes terms of reference for a compliance investigation.
4. The compliance appraisal and this report have been prepared in accordance with the updated TOR and Procedures and Guidelines (PGs) of the IRM.⁴

III. BACKGROUND

Background to GCF Project FP034

5. GCF Project FP034 is intended to enhance Ugandan subsistence farmers' resilience to 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 aims to reach 24 districts in the south-western and eastern regions of Uganda.
6. FP034 was approved at the 15th meeting of the GCF Board on 15 December 2016, and the estimated completion date is 31 December 2027.⁵ At the time of approval by the GCF Board, the Project was assessed as belonging to environmental and social risk Category B. The Accredited Entity (AE) for this Project is the United Nations Development Programme

¹ [c0023-selfinitiated.pdf](#)

² [FP034: Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda | Green Climate Fund](#)

³ [2017 IRM Terms of Reference | Independent Redress Mechanism | Green Climate Fund](#)

⁴ [2019 Procedures and Guidelines of the IRM | Independent Redress Mechanism | Green Climate Fund](#)

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

(UNDP) and the Executing Entity (EE) for this project is the Ministry of Water and Environment (MWE) of the Republic of Uganda.

7. Secretariat due diligence on environmental and social safeguards related to the funding package for FP034 was carried out against policies including the GCF's Interim Environmental and Social Safeguards,⁶ the Initial Project and Programme Activity Cycle⁷ and Initial Risk Management Frameworks.⁸ Since project approval, the Secretariat has reviewed Annual Performance Reports (APRs) pursuant to the GCF's Monitoring and Accountability Framework⁹ related to implementation of funded activities. Secretariat obligations for management of environmental and social safeguarding issues are further articulated under Environmental and Social Policy (adopted in 2018).¹⁰ An indicative list of applicable policies is provided in Section V of this report.
8. The IRM notes that several of the aforementioned policies have been revised and replaced with successor policies. Additionally, since Board approval in 2016, the project has gone through a number of revisions to core project safeguarding frameworks and has been subject to a Board-approved restructuring proposal at the 45th meeting of the GCF Board in July 2026.¹¹ The IRM takes into account any changes in institutional governance and project implementation arrangements, as feasible and appropriate.

Summary of the IRM-Initiated Proceedings Report:

9. Between October 2024 and January 2025, the IRM became aware of three fatal drowning incidents involving minors at water-retention facilities financed under GCF Project FP034. Two incidents led to IRM complaints (IRM Cases C-0011-Uganda¹² and C-0012-Uganda¹³), both of which were resolved through dialogue-based processes focused on providing immediate support to affected families. The cases did not investigate the circumstances of the deaths or address broader compliance issues.
10. In the IRM-Initiated Proceedings report, the IRM reviewed project documentation that indicated a pattern of reporting on community health and safety risks associated with water-retention facilities and fishponds. Annual Performance Reports from 2021 through 2023 repeatedly identified risks related to inadequate fencing and the possibility of drowning, particularly for children. Grievances submitted in 2022 and 2023 specifically raised concerns about unfenced facilities and drowning risks to minors. Despite the

⁶ [Interim environmental and social safeguards of the Fund \(Performance standards of the International Finance Corporation\) | Green Climate Fund](#)

⁷ [Initial proposal approval process, including the criteria for programme and project funding - B.07/03 | Green Climate Fund](#)

⁸ [Fund's financial risk management and investment frameworks: Financial risk management framework - B.07/05 | Green Climate Fund](#)

⁹ [Initial monitoring and accountability framework for accredited entities - B.11/10 | Green Climate Fund](#)

¹⁰ [Environmental and Social Management System: Environmental and Social Policy - B.19/10 | Green Climate Fund](#)

¹¹ [GCF/B.45/07 GCF/B.45/07: Consideration of funding proposals: Consideration of a request for changes to the scope of funded activity FP034 \("Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda"\) | Green Climate Fund](#)

¹² [C0011 Uganda | Independent Redress Mechanism | Green Climate Fund](#)

¹³ [C0012 Uganda | Independent Redress Mechanism | Green Climate Fund](#)

recurring risk identification, evidence gathered by the IRM indicates that fencing remained incomplete or inadequate at some sites when fatal incidents occurred.

11. In its preliminary inquiry, the IRM examined Annual Performance Reports (APRs), project evaluations, audit reports, mission reports, and field observations. The IRM-Initiated Proceedings Report identified several concerns, including delays in preparing site-specific Environmental and Social Management Plans (ESMPs), delayed implementation of safeguarding measures, inadequate post-construction monitoring, and deficiencies in the design, operation, and documentation of water-retention facilities. Site visits and stakeholder interviews conducted by the IRM in January 2025 also confirmed cases where fencing was absent, degraded, or installed only after incidents occurred.
12. Although subsequent actions and reporting by GCF, UNDP, and the Executing Entity indicate improved safety measures around water retention facilities and associated infrastructure works, the IRM concluded that an independent compliance review may be necessary to closely examine the circumstances of potential non-compliance with GCF policies and procedures, the contribution of this non-compliance to the reported fatalities and whether corrective measures are sufficient to prevent recurrence in this and similar project-financed activities.

Adverse impacts:

13. There have been three fatalities recorded at sites financed by the GCF project. 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 does not have sufficient information to determine if the remedial measures put in place and overseen by GCF, UNDP and MWE are satisfactory in ensuring sustainability of interventions, including the prevention of adverse impacts to project-affected communities.

IV. COMPLIANCE APPRAISAL

Procedural Steps taken by the IRM

14. In accordance with paragraph 52 of the IRM's PGs, the Secretariat, in consultation with the relevant AE (UNDP), as appropriate, the IRM requested that the Secretariat provide a response to the IRM Initiated Proceedings Report and documentation related to IRM Cases C-0011-Uganda and C-0012-Uganda on 4 August 2026.¹⁴ The IRM also informed the National Designated Authority (NDA) and UNDP that a request for response had been submitted to the Secretariat and informed them of the option to liaise with the Secretariat regarding the response.
15. The IRM also highlighted potential non-compliances of the Project with GCF's operational policies and procedures, which if substantiated, may have potentially adversely affected communities, including the Interim Environmental and Social Safeguards, the Environmental and Social Policy, the Monitoring and Accountability Framework for Accredited Entities, the Risk Management Framework (as applicable in both design and implementation phases of the project) and the Initial Proposal Approval Process.

¹⁴ Request for Secretariat Response in relation to Case C-0023-Uganda concerning FP034, dated 4 August 2026

16. The IRM requested the Secretariat to respond to two key issues identified in relation to the three reported fatalities (i) Community health, safety and security risks related to construction, operation and maintenance of project-funded fishponds and water retention facilities in Project wetland areas; and (ii) Secretariat, UNDP and MWE action and/or inaction in ensuring compliance of GCF Project FP034 with applicable environmental and social safeguards policies related to applicable environmental and social safeguards policies in the pre-approval and post-approval phase.
17. The Secretariat requested and was granted an extension to provide a response. On 9 September 2026, the Secretariat provided a response to IRM Case C-0023-Uganda.¹⁵

¹⁵ Secretariat's Response to IRM Request in relation to Case C-0023-Uganda concerning FP034, "Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda", dated 9 September 2026

Summary of Secretariat Response:

18. In response to the notification of the three fatalities, the Secretariat argues that it acted in accordance with applicable GCF policies based on the information available to it at the time. The Secretariat states that it had no knowledge of the drowning incidents before they were brought to its attention through IRM complaint processes and emphasizes that, once informed, it immediately engaged with UNDP and the Government of Uganda to address the risks. The Secretariat states that UNDP has reported and confirmed that all water-retaining facilities under the project have been fenced to enhance safety and minimize the risk of further accidents and that this information was further verified at sample sites through the Secretariat's own monitoring mission conducted in March 2026. The Secretariat also notes that the project has recently undergone restructuring to strengthen safeguards, oversight, and risk management.
19. In response to the factual assertions in the IRM report, the Secretariat provides detailed descriptions of its understanding of the circumstances surrounding the three drowning incidents. It acknowledges that serious community health and safety concerns arose but contends that the IRM's assessment relies heavily on historical conditions that existed before extensive corrective measures were implemented. The Secretariat further argues that both its own investigations and UNDP's Office of Audit and Investigations (OAI) audit report reviewed compliance with safeguards and oversight obligations, leading to targeted remedial measures. While recognizing the reputational implications of the fatalities, the Secretariat maintains that any assessment of current risk should take account of the substantial actions already undertaken to improve safety and compliance.
20. The Secretariat also explains the due diligence conducted during project appraisal and implementation. It notes that the project was ultimately classified as a Category B (moderate risk) activity and was subject to environmental and social safeguard requirements, including environmental and social management plans, grievance redress mechanisms, and livelihood restoration measures. During implementation, the Secretariat reviewed annual performance reports, sought clarifications from UNDP on safeguards issues, and requested updates on fencing, community safety, and environmental and social management measures. The Secretariat highlights that concerns relating to drowning risks, fencing delays, and community grievances appeared progressively in project reporting starting in the APR for Calendar Year 2022.
21. Following the first drowning incident notification in late 2024, the Secretariat states that it significantly intensified its oversight of the Project. The Secretariat states that it conducted an ad hoc mission to Uganda in December 2024, identified material deficiencies in safeguards implementation, monitoring, grievance management, and livelihood restoration, and agreed on a corrective Risk Management Action Plan with UNDP and the Ministry of Water and Environment. The plan required comprehensive environmental, health, and safety assessments of project sites, strengthened safeguards staffing and oversight, improved incident reporting, enhanced grievance mechanisms, and regular progress reporting. Continued shortcomings and delays in implementation ultimately led the Secretariat to issue a Notice of Event of Default and require further remedial actions under the project's legal agreements.
22. The Secretariat concludes that it has taken extensive remedial and accountability measures to restore compliance and reduce future risks. These include requiring corrective actions, requesting a UNDP OAI audit, undertaking additional monitoring missions, restructuring the project, strengthening environmental and social safeguards instruments, and enhancing

monitoring and grievance procedures. The Secretariat further states that it has taken steps to pause its consideration of new programming with UNDP pending a broader portfolio assessment. The Secretariat asserts that it continues to conduct enhanced monitoring of both the project and the wider UNDP portfolio. Looking ahead, the Secretariat commits to maintaining close oversight of FP034 and working with UNDP to ensure ongoing compliance with GCF requirements.

Issues Raised

23. In preparation of this compliance appraisal report, the IRM compliance function reviewed the following materials: (i) the IRM-initiated proceedings report for IRM Case C-0023; (ii) Reports related to IRM Case C-0011-Uganda and IRM Case C-0012-Uganda; (iii) the response of the GCF Secretariat; (iv) project documentation for FP034, at the pre-approval and post-approval phases; (v) audits and reports produced by the GCF, UNDP and other project implementing entities regarding the fatal incidents; and (vi) documentation related to applicable GCF policies and procedures.

24. In the IRM's view, the following issues arise for consideration in the compliance appraisal of this case:

Community health and safety risks related to design, construction, operation and maintenance of project-funded fishponds and water retention facilities in Project wetland areas;

25. Per the requirements of IFC Performance Standard 4 (Community Health, Safety and Security) of the GCF's Interim Environmental and Social Safeguards, the design, operation and decommissioning of project-financed infrastructure works is expected to be carried out in accordance with good international industry practice, with consideration given to safety risks experienced by third parties or project-affected communities.¹⁶

26. The IRM understands that two of the three reported fatalities occurred in project-financed water retention sites where fencing was reported to be inadequate or degraded. The IRM also understands that the third reported fatality occurred at a non-functional project-financed water-retention facility, where two children reportedly bypassed existing safety measures to enter the site for fishing.¹⁷ The IRM does not at this stage have access to detailed incident reports of each drowning incident but notes that the first reported fatality occurred in March 2023 and was only brought to the attention of the Secretariat following registration of the IRM complaint in December 2024. The IRM's understanding of these facts is subject to verification during any investigation phase.

27. The Secretariat in its response states that it considers the UNDP OAI audit and the Secretariat's own compliance assessment to have examined compliance against specific safeguarding requirements, and that both assessments have examined safeguards, compliance and oversight issues relevant to the circumstances in which the drowning incidents occurred. The Secretariat further notes that much of the relevant information pertaining to the reported fatalities already exists in the public domain, through IRM case documentation, APRs and the UNDP OAI audit report.

28. In the IRM's view, the compliance assessment conducted by the Secretariat and the UNDP Audit do not sufficiently detail policy requirements related to community health and safety

¹⁶ [2012-ifc-performance-standards-en.pdf](#)

¹⁷ Secretariat Response to IRM Request in relation to Case C-0023-Uganda concerning FP034

risks and impacts and subsequently connect them to the circumstances or reported risks of drowning incidents involving minors. The IRM further notes that given the differential responsibilities over management and/or oversight and supervision of environmental and social safeguards risks and impacts, outstanding issues related to the actions of the Secretariat, UNDP and MWE in relevant time periods remain to be examined.

29. The information reviewed therefore indicates *prima facie* evidence of non-compliance with applicable GCF policies and procedures, potentially contributing to the circumstances resulting in the drowning of three minors in project-financed sites.

Oversight, supervision, monitoring and/or management of project-level environmental and social safeguards risks and impacts, and the corresponding actions and/or inactions of the GCF Secretariat, UNDP and Ministry of Water and Environment in ensuring compliance of GCF Project FP034 with applicable environmental and social safeguards policies;

30. Per the requirements of Performance Standard 1 (Assessment and Management of Environmental and Social Risks and Impacts) of the GCF's Interim Environmental and Social Safeguards, an environmental and social assessment and management system is designed to provide structured process to manage risks and impacts to workers, affected communities and other stakeholders. Where site-specific risks may not be fully identified, the environmental and social management system is designed to identify roles and responsibilities, and to the extent feasible, anticipate and avoid risks via a mitigation hierarchy. Elements of an ESMS relevant to GCF Project FP034 and the reported fatalities include establishment of policies, identification of risks and impacts, management programs, capacity and competency of relevant parties, emergency preparedness and response and monitoring and review.
31. The IRM understands that core project environmental and social safeguards documentation for FP034 underwent updates at various stages, including the due diligence phase in alignment with contractual conditions required prior to disbursement or commencement of project-financed activities. Project documentation included a project-level Environmental and Social Management Plan (2016), that was subsequently updated into an Environmental and Social Management Framework (2019), with an update to the social and environmental risk category and cascaded down to site-specific environmental and social management plans that were only completed in December 2024 and January 2025.
32. Per the Secretariat Response, first-level due diligence and management of site-specific environmental and social risks and impacts rests with UNDP. The Secretariat reports that it queried UNDP on environmental and social safeguarding risks highlighted in self-reported APRs from CY2018 through CY2023, prior to the period of enhanced GCF oversight and monitoring. Given the timeframe allotted for APR review, communications between the GCF and UNDP occurred over a period of several weeks to months from initial submission to finalization. In APR reporting received by the GCF, prior to CY2024, community health and safety risks did not reference any of the sites where drownings were subsequently reported. The IRM at this stage does not have sufficient information to determine if project-level risks and impacts related to community health and safety were appropriately anticipated, documented, mitigated and managed in the course of project implementation, prior to the period of enhanced oversight and supervision.

33. At this stage, the IRM understands that the Secretariat's *ad hoc* check and subsequent contractual remediation efforts, as well as the UNDP OAI audit, identified serious gaps in the implementation of safeguards management system, namely, in the development of site-specific ESMPs, implementation of safety measures, operationalization of the grievance redress mechanism, document retention and records-keeping and monitoring and review of sites. The IRM further observes that a specific environmental and social risk management requirement embedded in project contractual arrangements between GCF and UNDP – that safeguarding documentation related to site-specific activities be shared with the Secretariat prior to the commencement of construction works – may not have been adhered to, resulting in a scenario wherein project-financed construction works were initiated and completed potentially without appropriate safeguarding documentation or management systems required under GCF policies and procedures. The scale and scope of this potential lapse in environmental and social risk management system is unclear to the IRM and the potential failures in ensuring compliance, as related to the roles and responsibilities of the Secretariat, UNDP and MWE, remains to be examined.
34. The information reviewed therefore indicates *prima facie* evidence of non-compliance with applicable GCF policies and procedures, related to project-level environmental and social management systems and governance arrangements.

V. SCOPE OF COMPLIANCE INVESTIGATION

35. The IRM is providing below a list of indicative policies against which it will assess compliance. The IRM understands the Board-approved project restructuring may have triggered application of updated versions or successors policies to the ones listed below as well as any new policies adopted since the initial approval of the project. In the investigation phase, the IRM will account for changes in the policy environment, as they may be applicable, for FP034.
- (i) Interim Environmental and Social Safeguards [Performance standards of the International Finance Corporation](Decision B.07/02, paragraph (c) and Annex III), in particular Decision B.07/02 Annex III, Part I, Section 1.1 (a)-(d), Section 1.4 (a)-(b); and relevant references in Part II (i.e. Guidance notes and relevant Guidelines relating to PS 1 and PS 4);
 - (ii) Environmental and Social Policy (Decision B.19/10);
 - (iii) Monitoring and Accountability Framework for Accredited Entities (Decision B.11/10);
 - (iv) Initial Project and Programme Activity Cycle, including the criteria for programme and project funding (Decision B.07/03);
 - (v) Risk Management Framework, as applicable; together with relevant provisions of the Initial Financial Risk Management Framework (Decision GCF/B.07/05), including updates or successors to policies comprising the Risk Management Framework related to the roles and responsibilities of the GCF Secretariat in time period spanning the design and implementation phases of the project;
 - (vi) Results Management Framework (Decision B.07/04) and Mitigation and Adaptation Performance Measurement Framework (Decision B.08/07), and successor policies.
36. The IRM identifies the following questions as guiding the investigation:
- (i) Did the design, construction, operation, maintenance and decommissioning of project financed water retention facilities and/or fishponds under GCF Project FP034 comply at relevant times with applicable GCF policies and procedures?

- (ii) Did the Secretariat's due diligence of community health and safety risks stemming from planned construction and/or infrastructure works, in pre-approval phase, comply with requirements under applicable GCF policies and procedures?
- (iii) Did the Secretariat monitoring and supervision of community health and safety risks and impacts of project-financed infrastructure works, in the post-approval phase, comply with requirements under applicable GCF policies and procedures?
- (iv) Did UNDP oversight of implementation of GCF Project FP034-financed activities related to design, construction, operation, maintenance and decommissioning of water-retention facilities and fishponds comply with requirements under applicable GCF policies and procedures?
- (v) Did UNDP comply with reporting requirements related to FP034-financed activities under applicable policies and procedures?
- (vi) Did MWE implementation of GCF Project FP034-financed activities related to design, construction, operation, maintenance and decommissioning of water-retention facilities and fishponds comply with requirements under applicable GCF policies and procedures?
- (vii) Was the loss of life and/or increased drowning a result of non-compliance of GCF Project FP034-financed infrastructure works with applicable GCF policies and procedures related to community health and safety risks and impacts?
- (viii) Are corrective actions and/or remedial measures undertaken by Secretariat, UNDP and MWE satisfactory in bringing GCF Project FP034 into compliance with applicable GCF Policies and Procedures?
- (ix) Does the Secretariat's incident reporting systems, procedures and mechanisms comply with applicable GCF policies and procedures to address risks or adverse impacts involving loss of life or serious injury arising from GCF-funded project implementation?

As part of its compliance investigation, the IRM will gather and review information, as appropriate, from concerned stakeholders and witnesses, including the complainant, the Secretariat, UNDP, the NDA, MWE, and other relevant stakeholders. The compliance investigation may include document reviews, meetings, discussions, site visits, evidence gathering, and expert opinions. At the conclusion of its investigation, the IRM will prepare a compliance investigation report for submission to the Board of the GCF. The report will include such recommendations on remedial actions, if any and as are appropriate, in the light of the findings of the IRM.