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ANNUAL REPORT ON GRIEVANCE CASES INVOLVING GEF-FUNDED PROJECTS

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I. OVERVIEW

1. This document is the sixth annual report to Council on grievance cases involving GEF funded projects under the reporting requirements of GEF Policies on Environmental and Social Safeguards and on Minimum Fiduciary Standards¹. In accordance with these policies, it provides a summary of cases taken under formal review by the independent Accountability and Grievance Systems and Investigation Functions of GEF Partner Agencies.

2. The summary reflects cumulative up-to-date information provided by GEF Agencies on cases as of November 19, 2025, in response to a request by the Secretariat. It includes cases reported in the Annual Summary to Council at its 68th Session in December 2024, new developments in these cases, and other cases and developments reported since that time as required by GEF policy.

3. As in past reports, this document begins with a short overview of the fundamentals and key elements of the GEF System for Conflict Resolution and Grievance Response (Section II), providing a re-cap of the core provisions of policy and practice on which the system is based.

4. The next section elaborates on an important topic arising from the cases: the question of individual accountability for policy non-compliance and related harm, and the availability of compensation to address such harms, especially in cases involving safeguards-related matters. This topic was raised in the Annual Report to Council last year, and the discussion below provides additional information based on further review and consultations since that time.

5. The next two sections contain the case summaries themselves. Section IV provides summary information for cases that are not subject to requirements of confidentiality². There are 48 cases reported in this section, covering the period from 2017 to 2025³. To date, 43 of these cases have been completed and 5 are open/active, including some in their final stages, as described below.

6. As in past Annual Reports, the cases are listed by year and the country in which the project takes place and grouped into cases involving safeguards-related issues and those involving

¹ [GEF Policy on Environmental and Social Safeguards, SD/PL/03 \(July 1, 2019\)](#);

[GEF Policy on Minimum Fiduciary Standards for GEF Partner Agencies, GA/PL/02 \(December 19, 2019\)](#).

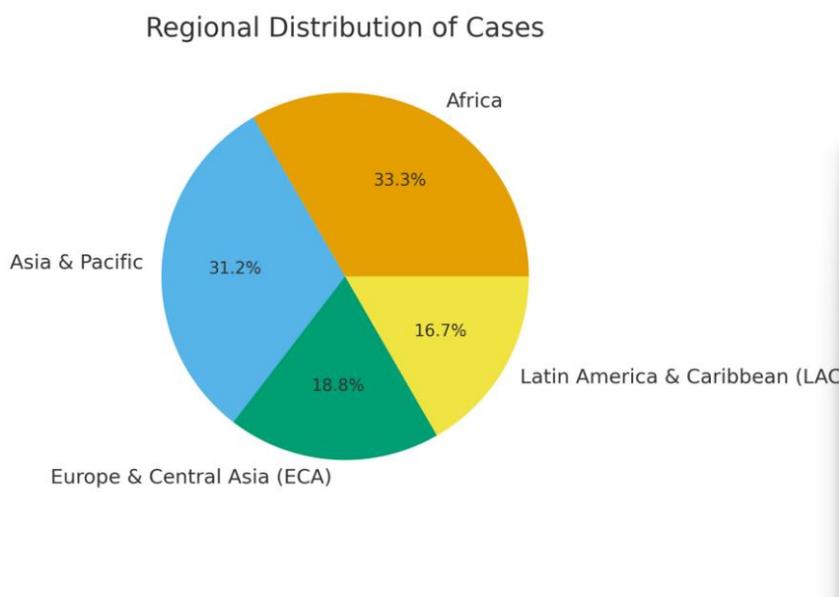
² As indicated below, GEF Policy recognizes that reporting is subject to Agency requirements of confidentiality, including for investigative needs and due process in cases involving fiduciary standards.

³ These case summaries are also on the GEF website on the Conflict Resolution page: <https://www.thegef.org/projects-operations/conflict-resolution-commissioner> . This total does not include three project-level grievance cases just reported to the Secretariat, listed as cases 49-51 below.

fiduciary issues⁴. Of the 48 non-confidential cases, 22 are classified as cases involving safeguards-related issues and 26 are classified as involving fiduciary issues. ⁵

7. Sixteen of the 48 non-confidential cases are located in Africa, 15 cases take place in Asia and the Pacific, 9 cases take place in Eastern Europe and Central Asia (ECA) and 8 cases take place in Latin America and the Caribbean (LAC). Figure 1 presents the regional distribution of the non-confidential cases.

Figure 1. Regional Breakdown of Non-Confidential Cases

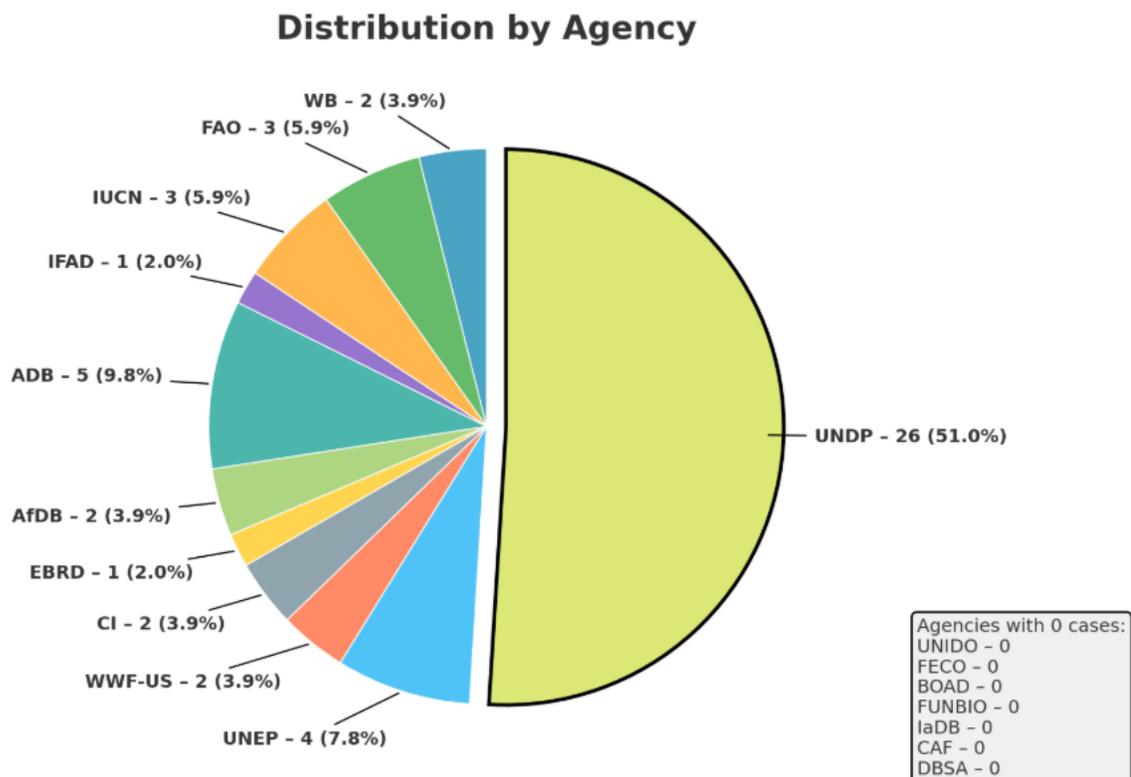


8. Twenty six of the 48 cases are reported in projects implemented by one GEF Agency and the remaining are associated with projects implemented by 10 other GEF Agencies in total 47 countries. Figure 2 below presents the breakdown of non-confidential cases by Agency.

⁴ Safeguards-related issues include cases arising under or relating to GEF Policies on Environmental and Social Safeguards, Stakeholder Consultations and Gender Equality, including rights of Indigenous Peoples. Fiduciary issues are those arising under or relating to GEF Policy on Minimum Fiduciary Standards.

⁵ The 21 cases in the “safeguards related” category include 12 cases/complaints addressed by a project’s own grievance mechanism rather than an Agency-wide mechanism. These are cases 7, 9, 10, and 15 – 20, and 49-51 below

Figure 2. Breakdown of Non-confidential cases by GEF Agency



9. Section V provides statistical information on the remaining cases that are subject to Agency requirements of confidentiality. There are 30 of these cases reported in this section⁶, with 20 of these cases now closed. All involve fiduciary matters where the responsible Agency has indicated a requirement for confidentiality. For these cases, GEF Policy on Minimum Fiduciary Standards provides reporting of statistical information only (paragraph II.15(f)). Additional information on these cases and status has previously been reported directly to Council.

10. Finally, Section VI provides a log of reporting to Council on individual cases when they arose, as well as on new developments in the cases (see Table 1). This separate reporting to Council on an ongoing basis is done in accordance with the updated reporting requirements of the two Policies (on Safeguards and on Fiduciary Standards) for prompt, real-time reporting on new cases, as well as new developments in those cases as they arise.

⁶ Some other previously confidential cases that have been completed in the past year are now reported in the public section of this report.

II. THE GRIEVANCE RESPONSE SYSTEM OF THE GEF

11. The GEF partnership has in place a policy-based system that provides a formal avenue of recourse for people and communities, including local communities, indigenous peoples, and civil society organizations, to submit concerns and complaints about projects and operations funded by GEF, and to seek responsive action.

12. To make this happen, each GEF Partner Agency must have its own system to receive and respond to such complaints and concerns, per minimum requirements set in policy and as part of their responsibility to implement GEF-funded projects⁷.

13. This grievance response system is designed to reflect and support key principles of the partnership –accountability, transparency, integrity, and meaningful stakeholder engagement. By giving greater voice to affected people and communities, it also provides a major pathway to support project objectives and achieve better results for the global environment. These principles and purposes – and the mechanics of how the system works - are set out in the two foundational policies of the system.

14. The GEF’s policy-based system includes policies relating to social and environmental safeguards.⁸ The Policy on Minimum Environmental and Social Safeguards, noted above, sets out two complementary mechanisms for grievance response in cases involving safeguards-related issues:

- i. *An Accountability Mechanism*, focused on issues of policy compliance which is “. . . independent, transparent, and effective” and “. . . accessible and broadly advertised to Stakeholders”; and
- ii. *A Grievance and Conflict Resolution System*, independent of project teams, working proactively as neutral third parties “. . . to assist in resolving disputes” in a “timely and culturally appropriate manner.”⁹ This can also be referred to as a collaborative problem-solving function (see discussion below).

As set out in the respective Agency systems, the decision about whether to seek recourse under the former or the latter, or both, is in the hands of complainants and affected people.

⁷See GEF Policy on Environmental and Social Safeguards, Minimum Standard 2: Accountability, Grievance Response, and Conflict Resolution; GEF Policy on Minimum Fiduciary Standards, para. II.15 Investigation Function.

⁸ As described below, safeguards-related issues include cases arising under or relating to GEF Policies on Environmental and Social Safeguards, Stakeholder Consultations and Gender Equality, including rights of Indigenous Peoples. Fiduciary issues are those arising under or relating to GEF Policy on Minimum Fiduciary Standards. GEF Policy on Environmental and Social Safeguards, Minimum Standard 2.

⁹ Id., Minimum Standard 2, paragraphs 5 and 6.

15. The GEF policy-based system also includes Minimum Fiduciary Standards¹⁰. This Policy requires Agencies to have an investigation function that provides for “*independent, objective investigation of allegations of fraudulent and corrupt practices*” and work “*competently and with the highest levels of integrity.*”

16. Both policies also contain explicit provisions to protect complaining individuals and parties against very real risks of retaliation and reprisal¹¹. The Policy on Fiduciary Standards also has a separate standard on “Hotline and Whistleblower Protection¹².” Similar protections are set out in the guidelines for submitting complaints to the GEF Conflict Resolution Commissioner¹³.

III. SPECIAL FOCUS – REMEDIES FOR HARM TO PEOPLE AND THE ENVIRONMENT

17. In addition to presenting the case summaries, the Annual Reports provide the opportunity to highlight trends, lessons, and issues to GEF Council arising from the cases, and relating to GEF’s system of Conflict Resolution more broadly.

18. The Annual Report presented last year put a focus on a topic raised by several members of GEF Council: whether the system is sufficiently robust in providing remedies where there are investigative findings of serious harm to people and/or the environment particularly in safeguards-related cases. The analysis last year noted the following points.

- Some investigations into safeguards-related cases found credible evidence of serious harm to people and the environment.¹⁴
- In these cases, and others, Agencies have taken a range of responsive actions at the project level. These include suspension, cancellation, and/or reformulation of projects, with adjustments and new components, in consultation with the communities and stakeholders, and identification of lessons learned for future projects. Some examples are noted below:

¹⁰ GEF Policy on Minimum Fiduciary Standards, paragraph 16

¹¹ 2 GEF Policy on Minimum Fiduciary Standards, Part II.16, Hotline and Whistleblower Protection; GEF Policy on Environmental and Social Safeguards, Minimum Standard 2, paras. 5(e) and (f) (protection of confidentiality and against retaliation).

¹² Id, paragraph 16.

¹³ GEF Website, Conflict Resolution, noting inter alia that “The Commissioner will at all times respect requests for confidentiality and anonymity by persons submitting complaints.

¹⁴ In two cases noted in the analysis last year, the investigations found that that communities were denied access to traditional lands needed for their livelihood and were subjected to violence and threat of violence (e.g., Transboundary Conservation Projects in Republic of Congo and Republic of Cameroon). Another case found evidence of sexual harassment, exploitation and other harms linked to excessive and unjustified enforcement of restrictions intended to achieve the needed environmental goals (LEAF II project in Uganda). These and other cases are summarized in more detail in Section IV below.

- In one case,¹⁵ the Agency decided to close the project and consider options for a new phase of work to support community-based conservation and livelihoods with indigenous peoples. Since closure, the agency implemented eight projects to support livelihood and income-generating activities for the communities.
- In another,¹⁶ the Agency took steps to reformulate the project in consultation with the communities and other stakeholders to ensure that the reformulated project is largely community-facing.
- In a third,¹⁷ the Agency acknowledged that the assessment on loss of livelihoods was not done at the beginning of the project and committed to advise the government to complete a Resettlement Action Plan (RAP) completion audit, commission an independent study of the displacement effects, and establish guidelines for adequate compensation to those eligible.
- In another case with findings of involuntary resettlement,¹⁸ the Agency implemented an action plan where a compensation process for the 64 individuals and their dependents directly impacted by the project due to resettlement was put in place.
- Responsive actions in other cases have included legal and regulatory reforms,¹⁹ community engagement,²⁰ and action plans with the government.²¹
- There have also been meaningful tailored resolutions at the community level in other cases through collaborative problem-solving efforts

¹⁵ *Integrated and Transboundary Biodiversity Conservation in the Basins of the Republic of Congo* (see full summary in Section IV below).

¹⁶ Transboundary Conservation Project in Cameroon (full summary in Section IV below).

¹⁷ LEAF II project in Uganda/DRC (full summary in Section IV below)

¹⁸ West Africa Coastal Areas Resilience Investment Project (full summary in Section IV, below).

¹⁹ Wetlands and ESA Bills; public access to wetlands data, Mainstreaming Biodiversity into Coastal Zone, Mauritius (full summary in Section IV, below).

²⁰ Ridge-to-Reef project, Myanmar (full summary in Section IV, below)

²¹ Strengthening Capacity to meet the Transparency Requirements of the Paris Agreement, Gambia (full summary in Section IV, below).

(including negotiation and facilitation),²² and specific types of remedial actions in cases of misconduct involving fiduciary standards.²³

- GEF Minimum Standards for partner agencies include provisions for compensation and/or restoration, among other remedies, in cases where avoidance and prevention have not occurred, per policy requirements.²⁴
- The above is background to the question raised, i.e., the extent to which remedies are provided for harms to affected individuals (e.g., compensation, restoration of livelihoods) and/or the environment (e.g., restoration, no net loss or preferably net gain), in addition to action at the project level, and whether there is individual as well as project-level accountability, as appropriate to the case and findings.

19. Building on last year's analysis, the Secretariat (GEF Conflict Resolution Commissioner) has reached out to GEF partner agencies to ask for additional input and observations on this question. To focus the analysis, the Agencies were asked if they have developed – or are developing – a remedies framework to guide decisions on remedies and ensure that the conflict resolution system is achieving its full objectives.²⁵

20. Several GEF partner agencies responded affirmatively to this question, as highlighted below:

- **World Bank:** the World Bank reports that they have the [framework for proportionality criteria and modalities for independent risk-based verification](#), prepared for the Committee on Development Effectiveness' and the Executive Directors' consideration by the Inspection Panel, Group Internal Audit (GIA) and Bank Management in accordance with the Inspection Panel Resolution, dated September 8, 2020. The framework also provides the steps that the Inspection Panel and GIA follow in recommending and carrying out verification of

²² This approach of collaborative problem solving is highlighted in the Annual Report to Council at its 63rd Session in December 2022. The resolutions include, e.g., relocation of a project site to avoid impacts on ancestral lands (Case 7 below, the Philippines); building a small shed to house a community's existing generators while the project transitioned to new system, and to retain these generators as back-up (Case 9 below, Tonga). Full summaries of these and other cases following this approach are in Section IV, below.

²³ In these cases, findings of misconduct or loss of funds have led to return of lost funds to the GEF Trust Fund, Financial Procedures Agreements between the Trustee and GEF Partner Agencies and established practice, as well as (in some cases) referral of individual cases relating to misconduct to national authorities.

²⁴ Annual Report on Grievance Cases, November 2024 (noted above), paragraph 23. The Safeguards Policy also has provisions for land-based compensation, provision of benefits and support for livelihoods in cases of loss of assets or access to assets involuntary resettlement (para. 9); No Net Loss or preferably Net Gain of associated biodiversity values over the long, and environmental restoration (paragraph 8); and provisions for Indigenous Peoples, Cultural Heritage, Pollution Prevention, Labor and Working Conditions, among others.

²⁵ It may be noted here that the GEF Minimum Standards on Accountability and Grievance Response do not include specific provisions on responsive actions

Management Action Plan implementation. The framework table can be found on page 3, which can be a good example.

- The IFC and MIGA have a [Remedial Action Framework](#). A good summary of it from an external NGO is here: <https://www.ciel.org/ifc-remedial-action-framework-remedy-harm/>. The IFC also has a [Responsible Exit Policy](#). There may be some synthesis of IDA/IBRD and IFC/MIGA approaches moving forward.
- On the INT remedies framework, IDA/IBRD, MIGA, and IFC each have their own sanctions frameworks, summarized and linked to in here: <https://thedocs.worldbank.org/en/doc/190891551909248715-0240022019/render/INTUsefulResourcesandLinks.pdf>.
- **InterAmerican Development Bank:** The IADB reports that they have produced a 2023 publication entitled “*Access to Remedy and Dispute Resolution. Contributions to the Conversation based on MICI’s Experience*”, linked [here](#). They indicate that this resource provides insights into the accountability mechanisms applied by the IDB when addressing community complaints.

21. One partner agency indicated that selection of remedies is based on recommendations of the investigation. This raises a related question of whether an Agency would apply a policy-based remedy to address findings of harm in cases where a remedy is not specifically recommended by an investigation.²⁶

22. Another agency indicated that it has not yet developed a remedies framework but would be very interested in learning about developments at other agencies to help guide its future work and action.

23. The Secretariat appreciates the responses provided by the agencies and would like to offer a few reflections for consideration.

- The provision of sufficient remedies is a critical element of an effective system of conflict resolution.
- It is important to consider remedies not only at the project level but, as appropriate to the case and per policy, for project affected people and the environment.

²⁶ This is particularly important given that some investigative mechanisms do not make specific recommendations on remedies, rather, the expectation is that these will be decided on and developed by the organization. Noting as well that the policy authority to provide appropriate remedies is in place.

- It is important to avoid a situation where remedies might fall short due to lack of clarity on whether the organization should apply certain remedies only where so recommended by investigators.
- The analysis above suggests that GEF minimum standards provide authority to apply remedies not just at the project level, but at the individual level as well. It also suggests the importance of doing so, per GEF Policy, where appropriate in light of the investigative findings.

24. The ongoing development by GEF partner agencies of remedies frameworks, and interest among other agencies and partners, can be a highly important evolution in this work. GEF policy and governance already play a key role by setting minimum standards for accountability and grievance response systems across GEF partner agencies. This could be further strengthened through additional guidance and sharing of lessons on remedies in response to investigative findings, for the benefit of affected people, the communities, and the partnership more broadly.

IV. NON-CONFIDENTIAL CASE SUMMARIES

25. This section contains the latest summaries of non-confidential cases to date, as submitted to the Secretariat by GEF Agencies as of November 19, 2025. The cases are divided into two groups: Safeguards-related Cases (Part A, below) and Fiduciary Standards-related cases (Part B, below).

A. Safeguards-related Cases

2017/2018

1. Republic of Congo (case completed) GEF ID 9159

Project: *“Integrated and Transboundary Conservation of Biodiversity in the Basins of the Republic of Congo”* (GEF Grant USD 281,273), part of the Global Wildlife Program, implemented by UNDP

Date complaint received: August 2, 2018

Summary of allegations: Survival International, a UK-based NGO, filed a complaint with the Social and Environmental Compliance Unit (SECU) of UNDP on behalf of six indigenous communities in the Sangha region in the north of the Republic of Congo. The indigenous Baka alleged that their access to the area, which is their traditional homeland and is essential to their livelihoods, has been severely restricted. They also claimed there was no proper consultation process including free, prior and informed consent, that the project would unlawfully evict Baka communities, and expressed human rights concerns. The Baka also alleged that eco-guards subject them to beatings and arrests. Further details are available on the [SECU registry](#).

Date case put under formal review: October 24, 2018

Status and findings: The SECU report was completed June 2020 ([final SECU report](#)). It found that: UNDP's over-arching commitment to human rights was not adhered to with respect to the rights of indigenous peoples. Investigation obtained credible testimony during the fieldwork in February 2019 not only from representatives of the indigenous (Baka) communities, but also from government and non-governmental sources, that armed eco-guards engage in violence and threats of violence against the indigenous Baka people in the Messok Dja area. The eco-guards are employed by the Government of the Republic of Congo's MEFDDE (UNDP's implementing partner). The Social and Environmental Screening Procedure (SESP) failed to identify critical project risks; as a result, Social and Environmental Standards (SES) were not implemented. No evidence that a due diligence review had taken place of partnerships with the private sector. UNDP's Policy on Due Diligence and Partnerships with the Private Sector identifies industrial logging and palm oil as high-risk sectors requiring a due diligence review)

Management action: The project was suspended on March 11, 2019. The UNDP Administrator took his Decision in November 2020 in response to the SECU report available [here](#). As described in more detail in the Decision, in follow-up to the SECU Report and other considerations, including the exceptional circumstances relating to the COVID-19 pandemic, the UNDP Administrator decided to close the project and consider options for a new phase of work to support community-based conservation and livelihoods with indigenous peoples. In April 2021, the UNDP Administrator responded to SI's request for an update on progress. The project was financially closed in January 2023 and the remaining project funds returned to the GEF.

Since closure of the *Integrated and Transboundary Conservation of Biodiversity in the Basins of the Republic of Congo* project, UNDP implemented eight projects supporting livelihood and income-generating activities with both Baka and Bantu in eight communities in the Messok-Dja landscape between 2021 and 2023. The projects were implemented as part of the Global Support Initiative to Indigenous Peoples' and community conserved areas and territories (ICCAs), funded by the Government of Germany and delivered by the GEF Small Grants Programme (ICCA GSI). They represented a total value of USD 250,000 issued as grants to Baka Indigenous organizations and were designed to support livelihood and income-generating activities with the Baka. Activities focused on biodiversity conservation, livelihoods, capacity building and COVID-19 pandemic recovery.

Status: Case completed.

2. Cameroon GEF ID 9155

Project: “Integrated and Transboundary Conservation of Biodiversity in the Basins of the Republic of Cameroon”. (GEF Grant USD 3,907,500). Link to [Project Document](#))

Agency: UNDP

Date complaint submitted by stakeholder: August 2, 2018

Allegations: Survival International, a UK-based NGO, filed a complaint with the Social and Environmental Compliance Unit (SECU) of UNDP and asserted that TRIDOM II will support the continued eviction and displacement of Baka and Bantu communities – eviction and displacement that began, they state, when the Nki National Park (herein Nki) was created in 2005, and that continued through TRIDOM I. Because the Baka rely mostly on traditional hunting and gathering activities for their livelihoods and wellbeing, their exclusion from the area is deeply affecting their way of life and survival.

Eviction and displacement have occurred (and are occurring), they assert, through measures that function to restrict community access to areas – including areas both within and adjacent to Nki - and to natural resources traditionally accessed by these communities within these areas. The complaint indicates that one such key measure is the use of wildlife guards who are preventing community members from pursuing their traditional hunting and resource gathering within these areas. This and similar measures, they argue, fail to recognize the communities’ rights to access these areas and resources. The complaint implies that TRIDOM II will be advancing the same measures, with the same results for communities. Further details are available on the [SECU registry](#).

Date case was put under formal review: October 24, 2018

Investigation Findings: The SECU report was completed in August 2020 ([final SECU report](#)). It found that UNDP did not screen project activities in TRIDOM II in a manner consistent with SES requirements. As indicated in the SECU report, the project did not accurately identify all communities that might be impacted, and how they might be impacted. Experts documented that hunter-gatherer communities, including those with villages in Zoulabot Ancien, have:

- Traditionally relied on access to Nki, a protected area determined to be part of the scope of the project, for natural resources;
- Been significantly adversely impacted by access restrictions advanced by national law and policy; and
- Have been subjected to violence as a means of enforcing such restrictions.

UNDP Cameroon confirmed that eco-guards can be a source of problems, and some use their power to intimidate communities, but measures were taken to reverse the situation. The project

document did not include (or reference) a required 'management plan' to address risks for indigenous peoples identified during the screening and assessment process.

The SECU report noted that while an MOU related to the project acknowledged the need to respect the rights of the Baka and the importance of Baka access to resources, it does not include a description of these rights or areas to which communities have access. The MOU indicated that such details would be included in an action plan, but this had not yet been developed – and the MOU did not clearly have the consent of all parties. The project document did not describe a project-level grievance mechanism that meets SES policy requirements. In September 2022, SECU released an [Interim Monitoring Report](#) and SECU will continue to monitor.

Management actions: The project was suspended on March 26, 2019. UNDP responded to GEF Council member comments to the draft SECU report in June 2020. UNDP Administrator took his Decision in February 2021 in response to the SECU Report. The Decision is available [here](#). Reformulation of the project was initiated, starting with Social and Environmental Safeguards risk assessments, including consultations with indigenous people and local communities, specifically the Baka and Bantu communities, following UNDP's SES Policy and Standards, including on Free, Prior and Informed Consent. Two rounds of FPIC consultations were conducted during November 2023 – January 2024 with 52 Baka villages in the zones of influence of Boumba Bek NP, Nki NP, and Ngoyla Faunal Reserve. A third round of FPIC consultations is planned prior to the signature of the reformulated project. The FPIC process was supported by international and national safeguards experts and produced a set of deliverables to support the reformulation and resubmission of the project to the GEF, specifically:

- Recommendations for the reformulation of the UNDP ProDoc;
- Updated Social and Environmental Screening Procedure;
- Environmental and Social Management Plan;
- FPIC report and Indigenous Peoples Plan;
- Updated Stakeholder Engagement Plan;
- Updated Gender Action Plan;
- Draft Grievance Redress Mechanism.

Based on consultations with the communities in the project landscape, and with government and other non-government stakeholders, UNDP is proceeding to reformulate the project to ensure that the reformulated project is largely community-facing. SES expertise and capacity for ensuring compliance with SES is envisaged through the reformulated project, through the recruitment of a Community Engagement and Safeguards Officer (CESO), supported by an international SES expert. The project will also put in place a project-level Grievance Redress Mechanism that requires involvement for UNDP Country Office in the event of any serious

breaches of UNDP safeguards standards and/or any alleged human rights violations against Indigenous Peoples.

Status: SECU case on-going

3. Myanmar (case completed) GEF ID 6992

Project: “*Ridge to Reef: Integrated Protected Area Land and Seascape Management in Tanintharyi*” (GEF Grant USD 5,250,000) ([project document](#))

Agency: UNDP

Date complaint submitted by stakeholder: September 20, 2018

Allegations: The civil society organization ‘Conservation Alliance Tanawthariv(CAT) filed the complaint on behalf of indigenous communities in the Tanintharyi Region of Myanmar. The complaint advances several claims, including the following:

- 1) In the development and inception phases of the project, UNDP is violating complainants’ right to free, prior, informed consent (FPIC);
- 2) the project violates the rights of Internally Displaced Persons (IDPs) and refugees to return to areas from which they were displaced by armed conflict;
- 3) the project threatens to contravene the ‘interim arrangements’ of the National Ceasefire Accords agreed by the Government of Myanmar and Ethnic Armed Organizations;
- 4) the project violates the UN Declaration on the Rights of Indigenous Peoples (herein ‘UNDRIP’) and the land and resource rights of the indigenous Karen Communities in the Tanintharyi Region of Myanmar; and
- 5) the project fails to recognize and support indigenous community-driven initiatives to protect indigenous territories, strengthen local institutions and practices, and protect forests and resources in the project area. Further details are available on [SECU registry](#).

Date case put under formal review: September 26, 2018

Update reported to Council: November 10, 2021; March 27, 2020; annually in grievance reports.

Investigation Findings:

See full details here: [SECU0010 | Social and Environmental Compliance Unit - Case Registry](#)

As noted in the UNDP Administrator’s decision, the findings of the compliance review highlighted important institutional lessons for UNDP’s engagement in complex and politically sensitive contexts. The decision advised UNDP Myanmar and other relevant UNDP units to duly consider the findings of the compliance review in the formulation and execution of future programming in Myanmar, with particular attention to matters concerning stakeholder engagement, Indigenous Peoples’ rights, and social and environmental risk management.

Management Action: Project was suspended on December 26, 2018 and was closed on 30 October 2024. is

Status: SECU case was closed on [18 August 2025](#);

Full details are available on the SECU website here: [SECU0010 | Social and Environmental Compliance Unit - Case Registry](#)

4. Ukraine (case completed) GEF ID 6942

Project: “Finance and Technology Transfer Centre for Climate Change (FINTECC)” (GEF Grant USD7,000,00).

Agency: EBRD

Date complaint submitted by stakeholder: The complaint was received by the EBRD’s Project Complaint Mechanism (PCM) on June 5, 2018 and it was registered and published on the [PCM Register](#) on June 21, 2018 in [English](#) and [Ukrainian](#).

Allegations: The Complainants (community members from Olyanytsya, Zaozerne, and Kleban villages in Vinnitsa Region of Ukraine with the help of CEE Bankwatch, Accountability Counsel, and Eco Action) raised environmental and social concerns as well as concerns about limited access to information in relation to the operations of MHP and the EBRD investments. The Complainants requested a Problem-solving Initiative be undertaken by the PCM and if not successful, a Compliance Review. A similar Complaint was also submitted to the International Finance Corporation’s Compliance Advisor Ombudsman (CAO). In order to avoid duplication of efforts, the Parties agreed for a co-facilitated process by PCM and CAO (the facilitation team).

Date case put under formal review: The case was registered on 21 June 2018 as Complaint 2018/09, according to the [PCM Rules of Procedure](#) (para 11-13).

Update reported to Council: January 9, 2024; March 20, 2020

Investigation Findings: In June 29, 2018, a PCM Expert was appointed to conduct the Eligibility Assessment jointly with the PCM Officer. The Eligibility Assessment Report was completed and shared with all parties on September 25, 2018, and disclosed on the PCM Registry. The Complainants and MHP (the Parties) agreed to discuss the issues raised in the complaint through a voluntary and constructive mediation process facilitated by the PCM jointly with the CAO. On October 1, 2018, the EBRD President's Decision to accept the recommendation to start the Problem-solving Initiative was publicly released and posted. The Problem-Solving process was conducted until August 2021. Overall, the Parties held 23 joint meetings with the support of the facilitation team, who also organized several bilateral meetings over the course of three years.

Management Action: In August 2021 it became evident that the Problem-Solving Initiative could not assist further in the trust building, so they informed the facilitation team of their decision to withdraw from the initiative as they considered that no further progress could be made within that dialogue space. As a result, the process was terminated as per Paragraph 2.4 c) ii of the Project Accountability Policy^[1]. IPAM has prepared a Problem-Solving Report in consultation with the Parties which provides a high-level summary of the process as the Parties had requested for the process and its outcomes to be confidential. In October 2022, the Case was found eligible for Compliance Review and IPAM issued the [Compliance Assessment Report](#). The Compliance Review process for the Case has been ongoing since October 2022, and IPAM is currently at the stage of preparing the consultative draft of their Report for the Parties of the Case. Additional information can be found in the Web Case Summary in the IPAM Registry [here](#).

Status: Investigation complete – case closed.

5. Armenia (case completed) GEF ID 8005

Project: “Sustainable Land Management for Increased Productivity in Armenia (SLMIP)”

(GEF Grant USD 3,937,500) (IFAD notes that the allegations in this grievance case are not related to the GEF funded components of the project).

Date complaint received: The complaint was received by IFAD on September 3, 2018. On January 17, 2019, IFAD began a process to determine whether the allegation was eligible for consideration.

Allegations: The complaint was made by an NGO in Armenia, on behalf of a village. The allegations are related to the investment component 2 (Rural Areas Water Infrastructure) of the project, funded by another IFI as co-financier with the Government of Armenia. The complaint is related to water infrastructure investments in a village which, the claim states, is contributing to water scarcity for a community in a neighboring village.

Date case put under formal review: Although this complaint was not related to activities financed by IFAD, at the request of the co-financier, a fact-finding mission was undertaken between June 16-29, 2019 under IFAD’s Social Environmental and Climate Assessment Procedures and based on IFAD’s Complaints Procedure. Following that mission, IFAD invited the Government of Armenia and the co-financier to verify further the facts and, as appropriate, to identify potential actions to address the issue, as in our view the complaint warrants further detailed investigation.

Investigation findings: Subsequently, an investigation was carried out by the Republic of Armenia Human Rights Defender Office. This investigation followed the earlier fact-finding mission under IFAD’s Social, Environmental and Climate Assessment Procedures. The investigation concluded

that proper procedures and permitting had been followed, and there was no evidence of any social or environmental effects due to the water supply investments of the project. The Office terminated its consideration of the complaint on May 11, 2020 and communicated its decision to the complainants.

Management actions: No suspensions or other significant management actions have been undertaken and are not deemed necessary at this time.

Status: Case completed.

2019

6. Mauritius (case completed) GEF ID 5514

Project: “*Mainstreaming Biodiversity into the Management of the Coastal Zone in the Republic of Mauritius*” (GEF Grant USD 4,664,521). ([project document](#))

Agency: UNDP

Date complaint submitted by stakeholder: 23 March 2019

Allegations: The complaint was filed by Aret Kokin Nu Laplaz (AKNL), an NGO coalition located in Mauritius asserting that UNDP's work in the country to protect Environmentally Sensitive Areas is tantamount to “greenwashing” in light of the permits being issued by the government for construction projects along the country's coast. According to the complaint, the GEF and UNDP were grossly negligent in continuously channeling funding to the government despite “...a number of critical GEF-funded projects ending up in Government drawers, or coffers rather, with very little effective results.” The complaint further alleges that in 2007- 2009 GEF and UNDP funded a complete inventory of all ESAs, as well as the drafting of an Act that would have ensured solid legal protection for all ESA, but the draft ESA Act was never presented to Parliament, nor was the national ESA inventory made public. According to the complaint, ten years down the road, “the results are catastrophic: the ESA protection system, which was to be fully integrated in the procedures for development clearances, has become purely cosmetic as development licenses and permits are issued with scant regard for ESAs.

Date case put under formal review (SECU): June 7, 2019

Investigation Findings:

1. Limited Progress on ESA Legislation: Despite recognition and advocacy efforts, there was minimal advancement in adopting legislation (by the Government of Mauritius) to protect Environmentally Sensitive Areas (ESAs), particularly wetlands.

2. **Risk Framework Reevaluation:** The UNDP Chief Technical Advisor (for the project) amended the project risk log as per the Management Action Plan, validated during a Project Steering Committee (PSC) meeting. However, the UNDP CO reported a moderate to high risk level for all biodiversity projects managed by the CO (due to context in Mauritius).
3. **Decline in NGO Engagement:** Despite commitments to strengthen stakeholder engagement, communication, and outreach, engagement with NGOs decreased following the SECU report and Administrator's decision, except for the Relaunch Workshop in March 2022.
4. **Challenges in Implementation and Oversight:** Efforts to ensure effective implementation and oversight towards project completion faced setbacks. Key elements, including the recruitment of a Social and Environmental Safeguards specialist, were not realized, contributing to a moderate unlikelihood of sustainability and several unsatisfactory evaluations in the project's Final Evaluation. SECU issued its Final Compliance Report in October 2020. The Administrator issued his decision in March 2021. SECU monitored the decision and commitments made by the institution until April 2024, when the case was formally closed, and a Closure Note was issued. Further details are available via this [link SECU case registry](#).

Management Action: The project has been financially closed and reported to Donors in August 2024. The TE and the SECU case provide vital learning and are informing on-going and future UNDP programming in Mauritius.

Status: Investigation complete – case closed. As the project is closed and reported to donor, and key project personnel are no longer available, SECU assessed that further progress was unlikely and closed the case.

Date of case closure: April 11, 2024

7. The Philippines (case completed) GEF ID 3980

Project: “Integrated Natural Resources and Environmental Management Sector Project (INREMP) in the Philippines” (GEF Grant USD 2,500,000)

Agency: Asian Development Bank (ADB)

Date complaint received: In June 2019 a petition from local community members was submitted to the Provincial Environmental and Natural Resources Office (PENRO) to immediately stop the on-going implementation of Reforestation and Agro projects under the INREMP under BAAGMADOLI WMU awarded to Dagupan Women’s Organization.

Consultations/Resolution: A series of consultations was facilitated by the Department of Environment and Natural Resources (DENR) and Local Government Unit (LGU) to address and

settle the issues. These included the standing and role of clan owner of the land, possible relocation of already implemented subprojects, and the purpose and intention of the conducted survey and mapping.

DENR Staff and Project Officers (POs) agreed to raise the issue to the Watershed Management Council. Based on the consultative stakeholder process, the issue was resolved in July 2020 by relocating the Reforestation and Agroforestry site to another area within the same municipality. The project areas of INREMP are mostly within ancestral domains of various tribes especially in the Chico River Basin (project site), where traditional and cultural practices still exist.

Conflict resolution of the grievance response mechanism is mainly being done using these traditional practices wherein the Council of Elders are the jury and judge in any disputes or conflicts and even crimes and domestic issues. In areas outside ancestral domains, the Barangay is the local government unit, in-charge or handling conflicts and grievances. For the project-related case, conflicts are being handled at the Council of Elders and Barangay Levels with the participation of other government agencies as needed.

No complaints were brought to the attention of ADB's Accountability Mechanism as these were all resolved through the project's own grievances redress mechanism. All grievances filed were reported and monitored through the project's Social and Environmental monitoring reports. ADB's grievance mechanism was publicly disclosed to all project beneficiaries.

Status: Case completed.

2020

8. Zambia GEF ID 8021

Project: *"Zambia Lake Tanganyika Basin Sustainable Development Project"* (GEF Grant USD 7,334,247)

Agency: AfDB

Date complaint submitted by stakeholder: June 16, 2020

Allegations: This case involves a land dispute raised by the Royal Lungu Chiefdom in Mpulungu District (Zambia) regarding the siting and construction of a Jetty, Landing Site and Fish Market in the same district. These are activities in project components financed through the AfDB loan (not GEF grant). As noted above, the claim is that the site involved is used for traditional rites and as such has to remain as open land.

Date case put under formal review: July 23, 2020

Update reported to Council: November 10, 2021; October 28, 2020

Investigation Findings: Based on the supervision mission findings, a management letter informed the Ministry of Water Development, Sanitation and Environmental Protection (Executing Agency) that civil works on the affected sites have been suspended. The same letter stressed that AfDB may suspend disbursement to the whole project if all environmental and social non compliances are not satisfactorily addressed before the end of the year 2020. Finally, AfDB management would lift the suspension when the Ministry of Water Development, Sanitation and Environmental Protection would take the necessary actions (alternative appropriate ceremony sites are allocated by the Government and accepted by the affected people) to resolve the case.

9. Tonga (case completed) GEF ID 9355

Project: “Tonga Outer Island Renewable Energy Project” (GEF Grant USD 2,639,269)

Agency: ADB

Date complaint received: During training sessions in May 2020.

Allegations: During training sessions in May 2020, members of four local communities complained at the project level, that they were not consulted properly with the idea of removing the old generators from the powerhouse and putting the new OIREP generator inside. These still-working generators were brought by the community themselves with their own hard-earned money and they did not want to see all their efforts go to waste. It has been requested by all communities if the project could help out and build a new small shed to shelter their old generators so when they switch from the old system to the new system built by OIREP, they still have these generators for back up and stand by.

Consultations/Resolution: The complaints have been reported to the Project Steering Committee, which has requested funding from ADB to resolve the issues. The Ministry of Meteorology, Energy, Information, Disaster Management, Environment, Climate Change and Communications (MEIDECC) has housed the old gen-sets in temporary shelters, while more permanent measures are being considered, in consultation with communities, through the project. The situation is now resolved as of end 2020.

For this case, no complaints were brought to the attention of ADB’s Accountability Mechanism as these were all resolved through the project’s own grievances redress mechanism. All grievances filed were reported and monitored through the project’s Social and Environmental monitoring reports. ADB’s grievance mechanism was publicly disclosed to all project beneficiaries.

Status: Case completed.

10. Tuvalu (case completed) GEF ID 9512

Project: “Tuvalu - Outer Island Maritime Infrastructure Project” (GEF Grant USD 500,000)

Agency: ADB

Date complaint received: October 2020 - issues and concerns raised during visit of project grievance response mechanism.

Allegations: Local community raised concerns about the strength and resilience of a “flex mat” being put on the beach to prevent erosion (see photo below); they raised doubts as to whether it could serve its purpose in times of strong winds based on their past experience, and questions as to why it was not laid in a concrete foundation.

Consultations/Resolution: A discussion was held between the community and Project Management Unit. The Safeguards officer explained that the mat is designed to flex with the beach, thus not laid in the cement foundation, and the issue was resolved. Since this is a pilot site this is continued to be monitored. The matter was resolved through the project-level grievance mechanism (no claim was filed with the ADB mechanism).

Status: Case completed.

2021

11. Togo (case completed) GEF ID 9906

Project: “West Africa Coastal Areas Resilience Investment Project” (GEF Grant USD 20,247,607). (<https://projects.worldbank.org/en/projects-operations/project-detail/P162337?lang=en>; <https://projects.worldbank.org/en/projects-operations/project-detail/P176313?lang=en>)

Agency: World Bank (WB)

Date complaint submitted by stakeholder: August 4, 2021

Allegations: WB inspection panel alleges that the project will adversely impact the fishermen, residents and property owners along the Togolese coast. the Project’s insufficient understanding of artisanal fishing, its value chain and its specificities in particular beach seine fishing and the different demographics reliant on it, meant that the Project could not identify the full nature of the impact, and therefore did not have appropriate mitigation measures to address these impacts on the different groups.

Date case put under formal review: September 7, 2021

Investigation Findings: The Panel found that the Project did take steps to minimize resettlement by reducing its footprint. However, it also found that Management did not ensure that the Project had in place sufficient support to assist Project Affected Persons to improve their livelihoods and standards of living or at least restore them. More information can be found in:

1. First Inspection Panel Report and Recommendation:
(https://www.inspectionpanel.org/sites/default/files/cases/documents/153-Non-Technical%20Summary-21%20March%202024_0.pdf) <https://www.inspectionpanel.org/sites/default/files/cases/documents/153-Inspection%20Panel%20Report%20and%20Recommendation-8-Nov-2021.pdf>
2. Second Inspection Panel Report and Recommendation: <https://www.inspectionpanel.org/sites/default/files/cases/documents/153-Inspection%20Panel%20Report%20and%20Recommendation-8-Jun-2022.pdf>
3. Inspection Panel Investigation Report: <https://www.inspectionpanel.org/sites/default/files/cases/documents/153-Inspection%20Panel%20Investigation%20Report-%2020%20April%202023.pdf>
4. Bank Management Report and Response: <https://www.inspectionpanel.org/sites/default/files/cases/documents/153-Management%20Report%20and%20Recommendations-2%20June%202023.pdf>
5. Press Release: <https://www.inspectionpanel.org/panel-cases/west-africa-coastal-areas-resilience-investment-project-p162337-additional-financing>
6. Non-Technical Summary of the Panel investigation: https://www.inspectionpanel.org/sites/default/files/cases/documents/153-Non-Technical%20Summary-21%20March%202024_0.pdf

Management Action: Management indicated that it agreed with the Government of Togo and consulted with the affected communities on an Action Plan. The Action Plan details how the Bank will work together with the Government of Togo and the communities to address the Panel's findings. The Government of Togo has confirmed its commitment to implement the Action Plan while the World Bank will support and monitor its implementation. Management committed to submit annual progress reports on the implementation of the Action Plan. On September 15, 2023, the World Bank Board of Executive Directors discussed the Inspection Panel's Investigation Report. The Board also approved Bank Management's action plan to address the Panel's Investigation Report findings.

Status: Investigation complete – case closed.

Date of case closure: October 7, 2024.

Management Action - Remedies: Please refer to the Proposed Management Action Plan (pages 34-36) in the Bank Management Report and

Recommendation: <https://www.inspectionpanel.org/sites/default/files/cases/documents/153-Management%20Report%20and%20Recommendations-2%20June%202023.pdf>

12. Colombia GEF ID 9663

Project: The complaint relates to *The Private Sector and Agenda 2030*, which is not funded by GEF. However, the complaint and the investigation reflect linkages with the *Sustainable Amazon for Peace Project* (GEF ID 9663), which is funded by GEF.

Agency: UNDP

Date complaint received: May 11, 2021

Summary of allegations: The complaint (related to a non-GEF project, alleges that UNDP Colombia's agreement with GeoPark, a Chile-based oil and gas company, violates UNDP's social and environmental commitments and represents a failure to properly conduct its private sector due diligence analysis when deciding to partner with this company. The complaint further notes that there are community processes in Putumayo, the Siona Indigenous Reservation of Buenavista and the Association for Holistic Sustainable Development of the Amazon Pearl (ADISPA), beneficiaries of the GEF-funded Sustainable Amazon for Peace Project, and that this creates a lack of coherence between different programs that the UNDP is supporting or implementing:

Date case put under formal review; September 7, 2021

Investigation Findings:

The final SECU Investigation Report was disclosed on 25 April 2025. The SECU investigation focused on the non-GEF funded "Private Sector and Agenda 2030" project and its intersection with other projects including the GEF-funded "Sustainable Amazon for Peace" Project. While a full investigation into the GEF-funded project was not undertaken, SECU presented limited analysis and findings, suggesting that while relevant actions taken by the GEF-funded project helped mitigate some of the risks and harms to communities, discrete aspects of the project, were not consistent with UNDP's social and environmental commitments. These included gaps in the identification of risks, disclosure of safeguards documents and preparation of all relevant assessments and plans,

Management Action:

The GEF-funded Sustainable Amazon for Peace Project operationally closed in December 2024, and multiple lessons learned have been derived from the case

Status: Management actions are under implementation for the non-GEF project. The SECU case remains open in the “monitoring phase”.

13. Nicaragua (case completed) GEF ID 11279

Project: *“BIO Clima: Integrated climate action to reduce deforestation and strengthen resilience in BOSAWÁS and Rio San Juan Biospheres, funded by the Green Climate Fund (GCF) and co-financed by GEF through FAO”* (GEF Grant USD13,031,427). [Nicaragua Mesoamerica Forest IP Project: Protection and conservation of forests of global importance located in the BOSAWAS Biosphere Reserve and the Indio Maíz Biological Reserve | GEF](#)

Agency: FAO

Date complaint submitted by stakeholder: June 30, 2021 - submitted to Independent Redress Mechanism (IRM) of the GCF (no complaint has been received by FAO).

Allegations: the complaint is by an afro descendent indigenous community located in the BOSAWÁS Biosphere Reserve in Nicaragua. The complaint welcomes the project objectives but alleges that it will harm the communities because prior to approval there were no proper consultations with communities including no Free Prior Informed Consent (FPIC). It also expresses a fear that the project will repeat history, including leading to environmental degradation and attacks by non-indigenous settlers against indigenous communities, resulting in the continuing usurpation of traditional and ancestral lands.

Date case put under formal review: Under the procedures of the GCF IRM, the complaint has been declared eligible for further processing on July 21, 2021. The Eligibility report can be found [here](#) and the project proposal presented to the GFC Board can be found [here](#).

Update reported to Council: December 2021

Investigation Findings:

(a) The IRM finds that there are ongoing recurrent violent conflicts of a serious nature in the project areas, especially in the north. The IRM also found the human rights situation relating to indigenous people in the project areas problematic in certain respects detailed in the report, and that this situation will likely impact the implementation of the project, particularly when conducting informed consultation and participation, and FPIC of indigenous communities. The IRM finds that due diligence under the GCF’s safeguards required proper data gathering and assessment through a conflict sensitivity analysis report and a human rights due diligence report.

These reports ought to have been prepared during the design phase of the project but have instead been postponed and will be carried out at a later stage when sub-projects are developed under the project. The IRM finds that this constitutes non-compliance with GCF safeguard policies and procedures and that it may adversely impact the complainant(s) and other indigenous communities in the project areas.

(b) The IRM finds that the GCF's safeguard provisions on informed consultation and participation (ICP) required in every GCF project have not been complied with in the Bio-CLIMA project. ICP involving indigenous people is often the beginning of the process leading to FPIC. In the Bio-CLIMA project, key aspects about the project, especially dealing with peaceful co-habitation regime agreements (PCRAs) should have been adequately disclosed and consulted with indigenous communities. The GCF's guidelines under the Indigenous Peoples Policy requires a "framework agreement" to be developed as part of such consultations setting out how, when and where FPIC will be conducted and the disclosure of key elements of the project. There is no evidence of such a framework being discussed as part of project disclosures and consultations with indigenous peoples. While the Bio-CLIMA project promises FPIC will be conducted at the sub-project level, the mandatory informed consultation and participation (ICP) process required under GCF safeguards prior to this project being presented to the Board for approval has not been conducted as expected. The IRM finds this to be non-compliance and one that has and will adversely impact the complainant(s) and other indigenous communities in the project areas.

In light of these findings, the IRM recommends the following actions to bring the project back into compliance with GCF policies and procedures:

- 1) Prepare a conflict sensitivity analysis at the project framework level as set out in paragraph 186 of this report;
- 2) Prepare a human rights due diligence report as set out in paragraph 187 of this report;
- 3) carry out a meaningful informed consultation and participation (ICP) process with indigenous communities in the project areas as set out in paragraphs 180 and 188-89 of this report;
- 4) Modify the Board's conditions so that the GCF Secretariat holds approving authority for the selection of the third-party monitor; and
- 5) Request the GCF Secretariat to prepare a remedial action plan. These recommendations are set out in more detail in Section VIII of this report. The IRM has also made recommendations based on lessons learned from this case with regard to the need for policy guidance from the Board on developing projects/programmes in conflict and post conflict areas and fragile states (paragraph 194 of this report) and regarding the Sustainability Unit of the Secretariat. *Additional information on the investigation, findings and outcomes of the GCF IRM relating to this case is [here](#).*

Management Action: Not applicable as FAO has not received nor processed the grievance. FAO and GEF SEC has closely monitored outcomes of GCF grievance redress

Status: Investigation complete – case closed

Date of case closure: refer to GCF IRM

14. Uganda-DRC GEF ID 5674

Project: “Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project (LEAF II)” (GEF Grant USD 4,510,000)

Agency: AfDB

Date complaint submitted by stakeholder: September 13, 2021

Allegations (Safeguards related): Alleged accusations of human rights violations of the indigenous peoples impacted by the project. Lack of stakeholder consultations, gender inequalities and undue force and violence to monitor and enforce the project, causing harm upon the surrounding communities during project implementation. Non-compliance of several Safeguards.

Date case put under formal review: November 17, 2021

Update reported to Council: May 29, 2024; December 20, 2023; October 26, 2022

Investigation Findings: The IRM investigation has been completed and the Compliance Review Report (approved by the Board of Directors on March 27, 2024) is linked here: https://irm.afdb.org/sites/default/files/project-file/EN_LEAF%20II%20Project%20-%20Compliance%20Review%20Report%20Final%20no%20annexes.pdf. The findings of the investigation include the following:

1. **Meaningful Consultation and Stakeholder Engagement.** IRM finds the Bank in non-compliance with AfDB’s OS1, OS2, and the DAI Policy as the Bank did not ensure that the minimum requirements related to consultations and stakeholder engagements were implemented and the relevant E&S information disclosed.
2. **Assessment of Impacts on the Livelihoods of Fisherfolk and Mitigation Measures.** The Bank did not comply with OS1 because it did not ensure that the Project had an adequate assessment of the impacts on the [Project Affected Persons] PAPs’ livelihoods, as the project’s environmental and social documents did not sufficiently: reflect the number of people affected; identify the type of impacts; design a dedicated budget for mitigation measures or livelihood alternatives; and determine specific prevention and/or mitigation measures designed in consultation with the beneficiaries and implemented. Particularly,

the Bank did not ensure that the Project had a baseline study to assess the current socio-economic status of the fishing villages covered by the LEAF Project, nor was this included as one of the socioeconomic requirements of the Project. AfDB prepared and implemented LEAF II without a final ESMP and/or RAP containing mitigation measures to address the economic displacement resulting from the LEAF II-supported enforcement of fishing restrictions. AfDB failed to ensure that the economic displacement was assessed, mitigated, and addressed in sufficient detail. AfDB also failed to identify during supervision that the livelihood impacts of the reported confiscation and destruction of productive assets were adequately addressed. AfDB also failed to identify that the grievance management system was not functioning as it should.

3. **Consideration of Gender Aspects within the Project.** The Bank did not ensure that the ESMP adequately identified and assessed the gender-specific risks and potential negative impacts to women, including threats of SEAH/GBV related to the enforcement of the new fisheries regulations. The Bank did not identify that the Project lacked environmental and social management plans addressing the risks and impacts of the Project on women and determining measures to address them, particularly regarding their access to livelihoods. On the contrary, the Project focused on positive impacts on women. This also led to a poor supervision on gender aspects, which included the absence, on the side of the Bank, of implementing specific actions and the inclusion of relevant gender expertise to identify whether the Project was generating any impacts on women during the implementation stages of the Project. The Bank also did not identify that:

a) the Project did not deliver on AfDB's and LEAF II's women empowerment objectives;

b) women benefited less from the Project; and

c) female fishmongers often faced the expropriation of their fish stock without due process and/or compensation. Additionally, the IRM finds that there is sufficient evidence to conclude that sexual harassment and exploitation committed by personnel related to the Project occurred. Sexual exploitation was frequently related to enforcement activities. Yet the Bank did not ensure that the Project have an expert on the GBV/SEAH, and a GRM appropriate to receive and handle survivors'/whistleblowers' complaints. Additionally, the Bank did not include any GBV-/SEAH-related supervision activities, nor did it include any expert in this field in the Bank's supervision team. Therefore, IRM finds the Bank in non-compliance with OS1 and OS2 on identifying and assessing the environmental and social impacts and risks related to gender and vulnerability.

Use of Excessive Force and Risks of Retaliation Against Those Who Raise Concerns. The Bank failed to ensure that the Project identify and assess the risks and potential impacts of UPDF-FPU using AfDB-funded boats and operational funds to conduct law enforcement and/or to satisfy itself that the SOP has been used at all times and that the affected people were provided with access to grievance redress. The Bank also failed to effectively supervise and ensure an adequate reporting system was in place as a way to determine whether the Project was generating serious risks to the personal integrity, security, and lives of the PAPs throughout the implementation of the Project. Additionally, during the completion phase of the Project, the Bank did not assess the social sustainability of the project results; thus, the Bank is found in non-compliance with OS1. IRM also finds that the Project was implemented in contravention of OS1's requirements related to grievance management as the PAPs by the actions of the UPDF-FPU were unable to register their grievances and/or obtain review and redress; they were also exposed and made to face retaliation and/or threats of retaliation by doing so.

Management Action: The final Management Action Plan in response to the investigation findings, approved by the Board of Directors of the AfDB on May 14, 2024, is attached and linked here: <https://irm.afdb.org/sites/default/files/project-file/Final%20approved%20-%20Management%20Response%20-%20IRM%20Compliance%20Review%20Report%20-%20LEAF%20II%20Project%20002.pdf>. It includes the Management Response and Action Record to each of the IRM Issues, as it refers to the IRM investigation report, as set out in detail in the attached.

Status: On-going. See above.

2022/2023

15. Solomon Islands (case completed) GEF ID 10746

Project: "Strengthening Resilience of Water Supply in Honiara" (GEF Grant USD 4,587,156).

Agency: ADB

Date complaint submitted by stakeholder: July 2022 – March 2023

Allegations:

1. The first was raised during vegetation clearance for the Kongulai WTP. Some of the trees that were felled at the western end of the construction site, landed over the boundary and damaged seven betel nut trees belonging to 2 community members. This required the contractor to compensate the owners based on rates that SW provided to REAN, who met with the owners. They accepted the payment and considered the issue resolved. This event which took place on 3rd March 2023 was witnessed by other residents and customary owners of Kongulai.

2. The second was received by Pacific Engineering Projects Limited (PEP), a contractor, and was resolved immediately. The grievance was raised by a shop owner regarding a boundary location. The Ministry of Infrastructure and Development (MID) was able to clarify to the shop owner that the area in question is within the road reserve and therefore, gave the clearance for the pipeline route to be installed in that location. The shop owner was also happy with the explanation. This grievance is under the baseline UWSSSP project but is not financed by GEF/LCDF.

Date case put under formal review: No formal complaint filed to ADB; it went through the Project Implementation Unit's Grievance Redress Monitoring (GRM)[\[1\]](#) process.

Update reported to Council: January 9, 2024

Consultations/Resolution: The Ministry of Infrastructure and Development (MID) advised that the area in question is within the road reserve and was therefore justified in granting clearance for the location to be used for the pipeline installation. No formal investigation was required; it was resolved through coordination with the MPA stakeholders through the Grievance Redress Monitoring process

Status: Investigation complete – case closed

Date of case closure: March 2, 2023

[\[1\]](#) The GRM is a three-stage process which allows for appeals at each stage: complaints are forwarded to the Project Manager who tries to solve the complaint. If a solution cannot be reached the complaint is referred upwards first to the Chief Executive Officer of SW and then, if no resolution is found, to a Grievance Tribunal of three people: (i) a member of the Board of SW; (ii) the Permanent Secretary (or designate) of the Ministry of Mines, Energy and Rural Electrification; (iii) an independent member jointly selected by Chief Executive Officer of SW and Board Chairman. Within five working days of the Tribunal meeting a formal response is issued to the aggrieved party outlining the Tribunal's decision on the grievance.

(SW- Solomon Islands Water Authority trading as Solomon Water)

16. Indonesia (case completed) GEF ID 5171

Project: "CTI: Coral Reef Rehabilitation and Management Program-Coral Triangle Initiative, Phase III (COREMAP-CTI III)" (GEF Grant USD 8,000,000).

Agency: ADB

Date complaint submitted by stakeholder: July 2022 – June 2023

Allegations: The complaints (9) are related to issues of small infrastructure development, hand-over of assets, permission to operate speedboat in an MPA which had not been released, and a permit for operational mooring buoy in Gili Balu.

Date case put under formal review: No formal complaint filed to ADB; it went through the Project Implementation Unit's Grievance Redress Monitoring (GRM) [\[1\]](#) process

Update reported to Council: January 9, 2024

Consultations/Resolution: no formal investigation was required; it was resolved through coordination with the MPA stakeholders through the Grievance Redress Monitoring process. The issues were resolved by the sub-contractors, the Project Implementation Unit with coordination with the MPA stakeholders.

Status: Case closed

Date of case closure: 31 December 2022

[\[1\]](#) The complaint was recorded through the GRM form and hotline mechanism, it has been recorded to and resolved in accordance with the GRM procedures.

17. **Trinidad and Tobago (case completed)** GEF ID 10188

Project: *"BIOREACH: Biodiversity Conservation and Agroecological Land Restoration in Productive Landscapes of Trinidad and Tobago"* (GEF Grant USD 3,752,162). [BIOREACH: Biodiversity Conservation and Agroecological Land Restoration in Productive Landscapes of Trinidad and Tobago | GEF](#)

Agency: FAO

Date complaint submitted by stakeholder: February 15, 2023

Allegations: In February 2023, the project received a complaint from Tableland Pineapple Farmers Association (TFPA), about the non-inclusion at a Farmer's Sub-Committee Meeting and reports of environmental damage observed at the Victoria Forest Reserve

Update reported to Council: June 2023

Consultations/Resolution: BIOREACH informed via email on February 16, 2023, that the project has involved TPFA in workshops that supported the project's formulation. With regards to the environmental damage report, the technical officer informed the complainant that the project cannot enforce against or investigate any possible breaches.

Resolution letter February 28, 2023 - TPFA was assured that they would be included and consulted in future meetings, especially when activities focused on farmer training and

development, exploring the development of a green value chain and agrotourism opportunities for Pineapple farmers. The matter was resolved by the parties. Regarding the second complaint, the PMU notifies the responsible agencies in writing and report TFPA when the letters are sent.

Status: case closed, March 2023

18. Regional – Mexico, Honduras, Belize, Guatemala GEF ID 5765

Project: “*Integrated Transboundary Ridges-to-Reef Management of the Mesoamerican Reef (MAR2R)*” (GEF ID: 5765, Grant USD 9,018,349). (See [GEF project page](#) and [WWF GEF project page](#) for [endorsed project description](#))

Agency: WWF-US

Date complaint submitted by stakeholder: April 2023

Allegations: Among all the sub-projects within the MAR2R, the "Comprehensive Water Resource Management with an R2R Approach in the Tulum Watershed" sub-project in Mexico received a grievance. A beneficiary raised a complaint because the composting latrine, which was part of the pilot project, had not been fully completed, with pending issues related to the door and paint. The grievance was submitted in writing and placed in a community complaint box.

Date case put under formal review: May 11, 2023

Update reported to Council: January 10, 2024

Consultations/Resolution: Centinelas del Agua A.C. (local NGO leading execution of the subproject in Mexico) and the PMU (Project Management Unit) received and addressed the grievance. They resolved it by installing the missing door and making the necessary adjustments to ensure satisfactory delivery to the beneficiary. Although there was no damage to the community, the slow provision of the promised construction slowed their ability to have a benefit from the project. Thus, despite the minimal health, safety and security risks, the project still addressed the complaint.

The grievance was left in box #004 in May: although it was dated April 25, it did not appear on the community box until May 11. It was retrieved by the safeguards staff on May 16, once they had secured the key to open the box. Upon deeming the grievance eligible, a field visit was conducted to the site in order to conduct a visual inspection. At that time, it was verified that the construction was 90 percent done and that an aluminum door had been installed. It was explained to the beneficiary that the delay in construction was because he had not been part of the first 15 beneficiaries selected. As such, the timeline for construction of his latrine was delayed from the original timeline. It was explained that his latrine was part of the second round of construction.

Status: Investigation complete – case closed, May 16, 2023.

19. Peru (case completed) GEF ID 9374

Project: “Securing the Future of Peru’s Natural Protected Areas (GEF6-PdP)” (GEF Grant USD 810,677). (See [GEF project page](#) and [WWF GEF project page for endorsed project description](#))

Agency: WWF-US

Date complaint submitted by stakeholder: December 21, 2022

Allegations: An operations staff in *Reserva Comunal Machiguenga* (RCM, by its acronym in Spanish) complained that *Profonanpe* (Fund for the Promotion of Peruvian Natural Protected Areas) had failed to make a payment of 960.00 soles that was pending since September 2021. At that time, the RCM and SERNANP (Peru’s National Service of Natural Protected Areas) staff sent official letters to *Profonanpe* attaching all the necessary documents for the Fund to make said payment to a provider of foodstuff that had been ordered for a demarcation activity. Upon further review, in January of 2022, the RCM team realized that *Profonanpe* had, in fact, paid that amount of 960.00 soles but to another provider. In December of 2022, the provider still had not been paid and communicated his unease to the operations staff filing this complaint.

Date case put under formal review: December 21, 2022

Update reported to Council: October 17, 2023

Consultations/Resolution: Upon further review, in January of 2022, the RCM team realized that *Profonanpe* had, in fact, paid that amount of 960.00 soles but to another provider. In December of 2022, the provider still had not been paid and communicated his unease to the operations staff filing this complaint. Payment was made to the correct vendor.

Status: This complaint was addressed within two days of its receipt and is now closed.

Date of case closure: December 23, 2022

20. The Gambia (case completed) GEF ID 10485

Project: *Strengthening capacity of institutions in The Gambia to meet transparency requirements of the Paris Agreement* (GEF Grant USD 1,100,000)

Agency: Conservation International (CI)

Date complaint submitted by stakeholder: November 2022

Allegations: The Gambia Ministry of Environment, Climate Change and Natural Resources (“MECCNAR”) submitted a complaint to Conservation International’s Global Environment Facility Agency (the “CI-GEF Agency”). The complaint raised concerns about the procedural approach,

project design transparency, and role and consultations between partners and stakeholders. After considering the complaint, Conservation International (CI)'s Global Grievance Committee (the "Grievance Committee") concluded that the complaint was eligible for consideration by the Grievance Committee, as provided under its Accountability and Grievance Mechanism.

Date case put under formal review: n/a

Update reported to Council: August 14, 2023

Consultations/Resolution: A series of consultations were facilitated by CI and MECCNAR to address and mutually resolve the concerns raised in an amicable and positive manner. These included measures and commitments to ensure the budget and activities outlined in the ProDoc will be revised in consultation with MECCNAR and that CI will seek written approval from MECCNAR before submission of the revised ProDoc, and that CI will ensure written approvals from its implementing partners before submission of final Project documentation.

Based on these consultations and the related resolutions and commitments, MECCNAR positively received and confirmed its acceptance of the developed action plan in February 2023.

Status: Case completed.

21. Tanzania (case completed) GEF ID 9524

Project: *"Supporting the Implementation of Integrated Ecosystem Management Approach for Landscape Restoration and Biodiversity Conservation in Tanzania"*. (GEF Grant USD 1,008,528)

Agency: UNEP

Date complaint received: July 2023

Allegations: UNEP was requested to undertake a Management Review of the project raised by US-based NGO regarding allegations of evictions, human rights abuses, and cattle seizure allegations occurring in specific areas in Tanzania.

Date case put under formal review: 8 August 2023. UNEP initiated a Management Review which concluded that the TRI Project in question is not implicated in the concerns. It confirmed that the project's intervention followed the standard procedures and the operational policies. There was no evidence to suggest harm derived from the GEF financed activities, nor any geographical linkage to the allegations. Further, the NGO confirmed that the allegations raised were not exclusive to the GEF-financed project.

Investigation Findings: UNEP initiated a management review encompassing a desk analysis of all pertinent project documentation, spatial analysis, a field visit by the Senior Safeguards

Advisor, and a series of consultations with project teams and wider stakeholders including local/national authorities and community representatives.

Management actions: UNEP reports that the case is now closed, and the complainant and all stakeholders were informed of the outcome of the Review.

Status: Case completed.

2024

22. Mexico GEF ID 9445

Project: “Sustainable Landscapes in Chiapas and Oaxaca” (GEF Grant USD 7,219,450)

Agency: Conservation International

Date complaint submitted by stakeholder: June 6, 2024

Allegations: The implementation of safeguards, specifically Free, Prior and Informed Consent (FPIC), was deficient.

Date case put under formal review: July 1, 2024; responded to aggrieved party on June 7, 2024

Update reported to Council: Not yet

Investigation Findings: Aggrieved party did not respond to requests for additional information. Confirmation of safeguards implementation with the project team. Additional evidentiary confirmation will be obtained, whereafter the grievance will be closed.

Management actions: Case cannot be further processed due to insufficient information from the complainant.

B. Fiduciary Standards Cases

2017/2018

23. Russia (case completed) GEF ID 3216

Project: “Standards and Labels for Promoting Energy Efficiency in Russia”

(GEF Grant USD 7,810,000)

Agency: UNDP

Date complaint was received: May 10, 2017

Allegations: A special annex to the terminal evaluation report of this project alleged, *inter alia*, procurement fraud and embezzlement. There were also claims of retaliation against persons involved in project review and in reporting alleged misconduct.

Date case put under formal review: May 10, 2017

Investigation Findings: Investigation by UNDP Office of Audit and Investigation (OAI) is closed. OAI investigated the allegations and found the claims of procurement fraud and embezzlement could not be substantiated and closed the case in May 2018. However, OAI did detect a number of irregularities linked to conflicts of interest in the Project Steering Committee that did not amount to misconduct of UNDP staff but did need to be addressed in order for the same mistakes not be repeated in the future.

Management actions: At the request of several member states, UNDP initiated an external review to determine if UNDP's management of the S&L project was appropriate and existing oversight and accountability policies effectively implemented. The results of the external review, the UNDP management response, and related documentation are here:

[Final Draft Report](#)

[UNDP Cover Letter](#)

[UNDP Ethics Office Response](#)

[UNDP Management Response](#)

[UNDP Office of Audit and Investigations Response](#)

[Final Report](#)

Note: UNDP also has initiated a broader system-wide audit of UNDP's management of the GEF portfolio. The results of this audit, the UNDP management response, and related documentation are here:

[Final Report](#)

[Action Plan](#) and [tracking of implementation of the Action Plan](#)

[Cover Letter](#)

UNDP OAI undertook a follow up Audit of UNDP's management of the GEF portfolio in April/May 2021. See final [report](#). Additional information on allegations of retaliation available at [UN Dispute Tribunal](#).

Status: Investigation Completed

24. India (case completed) GEF 5361

Project: “Market Transformation and Removal of Barriers for Effective Implementation of State Level CC Action Plans” (GEF Grant USD 3,744,438)

Agency: UNDP

Date complaint received: May 9, 2018

Summary of allegations: Procurement fraud

Date case put under formal review: May 22, 2018

Investigations Findings: OAI investigation closed on February 10, 2022. Allegations unsubstantiated.

Management actions: Project financially closed in Aug 2022.

Status: Case completed.

25. Afghanistan (case completed) GEF ID 4227

Project: “Building adaptive capacity and resilience to climate change in Afghanistan” (LDCF Grant USD 5,390,000)

Agency: UNEP

Date complaint was received: See below.

Allegations (and nature of the claim): UNEP management identified irregularities in financial reporting, delayed submission, and issues relating to expenditure eligibility. This led to an internal audit, with concerns referred to the Office of Internal Oversight Services (OIOS).

Date case put under formal review: The OIOS audit was conducted between Nov 2018 and Feb 2019 with the final report released in May 2019.

Investigation Findings: Financial handling practices did not align with best practices, and there was a lack of clear records for expenditures tied to their respective projects.

Management actions: Management suspended all disbursements as an interim measure pending the OIOS internal audit. The audit and financial analysis determined that \$323,920 were ineligible costs charged to the LDCF project, which were then retrieved. Management implemented restructuring measures to strengthen accountability mechanisms within the concerned Branch. The Country Program Manager for the Afghanistan Office was replaced. Following a Steering Committee Meeting to discuss these events, a decision was made to transfer

the project execution to NEPA. However, the project was later cancelled due to the emerging challenging political situation. UNEP reports that the case was closed.

Status: Case completed.

2019

26. Mauritius (case completed) GEF ID 10084

Project: “*GEF Small Grants Programme in Mauritius*” (Part of GEF SGP 7th Operational Phase – Core (Part 1) - GEF Grant USD 61,538,462)

Agency: UNDP

Date complaint was received: March 31, 2019

Allegations: The Environmental Protection and Conservation Organization (EPCO), a former SGP grantee in Mauritius, alleged improper grant management by the SGP National Coordinator, including termination of their grant, favoritism, and conflict of interest by a National Steering Committee member.

Date case was put under formal review: April 16, 2019 by UNOPS

Investigations Findings: The Internal Audit and Investigation Group (IAIG) of UNOPS found no evidence of fraud but that: (i) the NSC member had a conflict of interest or at least perception of such; (ii) several grantees used the technical assistance of an NGO owned by the NSC member, and his organization materially benefitted. The report recommended several steps to improve the implementation of the SGP Operational Guidelines and Standard Operation Practices.

Management actions: UNOPS worked with the SGP Country Programme Team to fully implement all recommendations of the Action Plan. Implementation was finalized and verified by the UNOPS Internal Audit and Investigation Group (IAIG) during the first quarter of 2021. The recommendations were linked to:

- 1) Removal of an NSC member due to identified conflict of interest;
- 2) Reinforcement of the practices and expectations related to the terms of reference (TOR) for National Steering Committee (NSC) members and ensure full compliance with the Conflict of Interest regulation/form; and
- 3) Assessment of audited grants as to whether any funds should be recovered.

As such, the NSC member has been replaced and NSC member rotation duly documented and shared with IAIG. Furthermore, SGP Mauritius has reviewed the composition and tenure of all National Steering Committee members, and two members have ended their participation in NSC.

SGP Mauritius has also adopted the new NSC meeting minutes template developed jointly by CPMT and UNOPS with a view to streamline information required from the NSC meetings and ensure that information recorded in NSC meeting minutes is improved in terms of quality, completeness, and in regard to conflict of interest. In early 2020, all members signed the conflict-of-interest statement at the NSC meeting.

Beyond that, SGP staff in Mauritius completed a course on ethical conduct and related UNOPS training on ethics and integrity. One project was terminated, and funds recovered by SGP have been reallocated to COVID-19 response projects. The SGP Mauritius team also documented proof-of-completion of all projects. UNOPS reviewed and verified all relevant financial reports for these projects.

Status of the case: Case completed.

27. **Kyrgyzstan (case completed)** GEF ID 5886

Project: “*Transboundary Cooperation for Snow Leopard and Ecosystem Conservation*” (GEF Grant USD 1,000,000) ([project document](#))

Agency: UNDP

Date complaint submitted by stakeholder: July 10, 2019

Allegations: UNDP staff member reported allegations of procurement fraud.

Date case put under formal review: July 29, 2019

Update reported to Council: July 10, 2019

Investigation Findings: OAI investigation was closed on 22 October 2021. UNDP has reported a finding of financial loss of US\$2,874.90.

Management Action: UNDP reimbursed the financial loss amount of \$2,874.90 to the GEF Trustee on 20 May 2024. Project financially closed in January 2021 and reported to donor in May 2021.

Status: Investigation complete – case closed, October 14, 2021

28. **Kazakhstan (case completed)** GEF ID 5059 and 4166

Projects: (1) “*Nationally Appropriate Mitigation Actions for Low-carbon Urban Development*” (GEF Grant USD 1,000,000); and (2) “*Promotion of energy efficient lighting in Kazakhstan*” (GEF Grant USD 3,400,000)

Agency: UNDP

Allegations: Procurement fraud.

Date case put under formal review: October 9, 2019

Investigation Findings: OAI investigation closed on April 6, 2022. Allegations substantiated with no quantifiable financial loss identified.

Management actions: Project GEF ID 4166 financially closed in April 2018. Project GEF ID 5059 under implementation with enhanced oversight, and Terminal Evaluation planned for February 2024.

Status: Completed

29. Zambia (case completed) GEF ID 4639

Project: *“Strengthening Management Effectiveness and Generating Multiples Environmental Benefits within and around Protected Areas in Zambia”* (GEF Grant USD 13,148,864)

Agency: UNDP.

Date complaint received: November 6, 2019

Allegations: UNDP Resident Representative informed OAI regarding allegations relating to a legal case and dispute by vendor that UNDP has not honored a payment related to the supply of scout uniforms and equipment (patrol kits). Investigation indicates possible misappropriation by a former employee of the vendor.

Date case put under formal review: November 7, 2019

Investigation Findings: OAI investigation closed on August 11, 2021. Financial loss of US\$68,562.00 confirmed through investigation, from an apparent misappropriation of funds for patrol kits by a former employee of a vendor in the project.

Level of Financial Damage subject to the Complaint: n/a

Management actions: Project implementation completed, and the project financially closed in March 2021. UNDP reports that the offender is an external person not under the jurisdiction of OAI, and that OAI has recommended the case against this person be referred to national authorities. UNDP also reports that it is taking the necessary steps to reimburse the GEF TF for the loss, working with the Trustee.

Status: Case completed

30. Sudan (case completed) GEF ID 4958

Project: “Climate risk finance for sustainable and climate resilient rainfed farming and pastoral systems” (GEF Grant USD 5,700,000)

Agency: UNDP

Date complaint received: November 6, 2019

Allegations: Related to procurement fraud

Investigation Findings: OAI has determined that the allegations made in relation to this project were unsubstantiated and they have closed the case.

Management actions: Project implementation completed, and financially closed in November 2022

Status: Case completed.

31. Libya (case completed) GEF ID 5307

Project concerned: “Umbrella Global Project on the Updating of National Implementation Plans for POPs” (Global Project with Libyan allocation of \$169,132)

Agency: UNEP.

Date complaint was received: November 13, 2019

Allegations: A senior GEF Secretariat staff member reported to the UNEP GEF Coordinator that she met the Libyan GEF Operational Focal Point (OFP) during an Extended Constituency Workshop of MENA Countries, and he reported to her that: “some of the funds transferred to the executing agency in Libya have disappeared.”

Investigation Findings: The complex political situation in Libya disrupted the standard reporting procedures between UNEP and the Libyan Executing Agency, the Environmental General Authority (EGA). This disruption was compounded as the EGA, along with other segments of the Libyan Government, experienced fragmentation. Notably, the Stockholm Convention Focal Point was located in the EGA branch in Tripoli, while the GEF Operational Focal Point resided in a competing EGA faction in Elbaida. The primary concern arose from funds that were transferred to the government of Libya and were not adequately accounted for during the turmoil in the country.

Management actions: In response to the challenging political situation, operations and further disbursements for the Libyan component were suspended. Efforts to address the unaccounted funds totaling \$38,312 involved communication through various channels, such as the

Permanent Mission of Libya to the UN Offices in Geneva, the UN Resident Coordinator, the Stockholm Convention Focal Point, and the GEF Operational Focal Point.

In July 2020, with the appointment of a new GEF Operational and Political Focal Point within the Government of National Accord in Tripoli, UNEP successfully re-established communication with the appointee and requested a formal review of the outstanding balance.

Subsequently, the Environmental General Authority conducted internal inquiries, reaching out to former staff and examining project archives. In March 2021, UNEP received an official correspondence and an endorsed expenditure report from the GEF Political and Operational Focal Point. After reviewing and accepting the reported expenditures, UNEP was able to account for the balance. In January 2023, UNEP communicated to the GEF OFP in Libya its decision to cancel the Libyan component of the project and proceeded accordingly. UNEP reports that the case was closed.

Status: Case completed.

32. Republic of South Africa (case completed) GEF ID 9494

Project concerned: *“Development of Minamata Initial Assessment in South Africa”* (GEF Grant USD 1,000,000)

Agency: UNEP

Date complaint was received: November 26, 2019

Allegations: Following a Project Steering Committee meeting held in Pretoria, South Africa in November 2017, the project beneficiary wrote to UNEP (as implementing agency) and the executing agency, raising concerns over a large sole source procurement valued at \$115,000. In 2018-2019, UNEP conducted an informal review into the procurement and agreed that there were valid issues linked to the procurement related to inappropriate identification, selection and payment to a supplier outside the scope of the project procurement plan and procurement policies of UNEP as set out in the legal instrument with the executing agency.

Date case put under formal review: The case was referred to OIOS in November 2019 and was included in their 2020 workplan for formal investigation.

Investigation Findings: OIOS transmitted its investigation report to the UNEP Executive Director on 27 May 2021. The report identified an unaccounted sum of \$36,000, which seems unlikely to be recovered, and recommended that UNEP take appropriate action. The Office of Legal Affairs (OLA)-NY was also involved to consider potential referral of the case to national judicial authorities.

Management actions: In response, and following consultations with the Executing Agency and Project Beneficiary, the responsible staff member from the Executing Agency was removed from all UNEP/GEF projects. UNEP's procurement section reviewed the agency's processes and assisted in developing a procurement manual aligning with international standards. The Executing Agency cancelled the procurement contract and recovered funds exceeding the value of services provided. Internal investigations at the Executing Agency led to the decision not to renew the contract of the staff member involved.

Projects under the Executing Agency now benefit from enhanced supervision and comply with financial rules, as verified by financial audits. The UNEP-developed procurement manual is being utilized by the executing agency. The project is currently in its closure phase, with UNEP reconciling the financials. As previously reported, UNEP will coordinate with the Trustee to return the lost amount of \$36,000 to the GEF Trust Fund. UNEP reports that the case has now been closed.

Status: Case completed

33. Ukraine (case completed) GEF ID 4377

Project: *"Development and Commercialization of Bioenergy Technologies in the Municipal Sector in Ukraine"* (GEF Grant USD 4,7000,000). ([project document](#))

Agency: UNDP

Date complaint submitted by stakeholder: November 18, 2019

Allegations: An anonymous source made allegations of procurement fraud in the award of a training contract and in the award of a contract for the provision of boilers. In addition, the complainant alleged that grants to five NGOs and four individual contracts were unduly awarded to people/entities linked to a member of the Project Board.

Date case put under formal review: November 18, 2019

Update reported to Council: January 16, 2024; February 22, 2022; April 21, 2021; April 10, 2020

Investigation Findings: The OAI investigation was comprised of six sub cases. Two sub-cases were substantiated and vendors have been included on the UNDP Vendor Sanctions list. The final four sub-cases were unsubstantiated. Cases connected to this project are now closed.

Management Action: This Bioenergy Project (GEF ID 4377) completed implementation and was reported as financially closed to GEF Trustee in May 2021. In March 2020, out of an abundance of caution, UNDP suspended a separate project in the Ukraine the Energy Efficiency in Public Buildings Project (GEF ID 5357) and initiated a full management review of the project. The management review has been completed and the Energy Efficiency project suspension was lifted,

with GEF CEO concurrence, on 4 March 2021. Project implementation is on-going with closure expected by June 2024.

Status: Investigation complete – case closed, April 4, 2023

34. Uzbekistan (case completed) GEF ID 6913

Project: “Market Transformation for Sustainable Rural Housing in Uzbekistan”

(GEF Grant USD 6,000,000)

Agency: UNDP

Date complaint received: March 12, 2020

Allegations: Failure to comply with UNDP obligations.

Date case put under formal review: March 17, 2020

Investigation Findings: Allegations unsubstantiated based on OAI investigation.

Status: Investigation Completed.

Date of Case Closure: February 16, 2022.

35. Sri Lanka (case completed) GEF ID 9093

Project concerned: “GEF Small Grants Programme (SGP) in Sri Lanka” (Part of the Sixth Operational Phase of the GEF SGP in Sri Lanka - GEF Grant USD 2,497,078)

Agency: UNDP

Date complaint received: June 30, 2020

Allegations: Sri Lanka Nature Forum (SLNF) - a network of registered environmental organizations in Sri Lanka – submitted allegations of wrongdoing, irregularities, discrimination, fraud, and injustice.

Date case put under formal review: July 31, 2020 by UNOPS

Investigation Findings: The Internal Audit and Investigation Group (IAIG) of UNOPS conducted a remote forensic audit of the program. It found no credible evidence of fraud or conflict of interest but rather gaps and irregularities in required documentation and management of the Country Programme and a lack of guidance on a small number of key issues, including conflict-of-interest documentation and involvement of civil servants in proposal design and implementation. The report recommended that UNOPS issue more comprehensive guidance in a number of areas to the NC/NSC, to improve the implementation of the SGP Operational Guidelines and Standard Operating Procedures.

Management actions: Following the results of the audit, UNOPS in coordination with UNDP, agreed on an implementation plan to address the recommendations with management actions, including guidance on key issues, that will not only strengthen management of the Sri Lanka SGP Country Programme but also that of SGP Country Programmes worldwide. UNOPS, in coordination with UNDP, will actively engage with the SGP Country Programme Teams to improve their capacities to more effectively and transparently perform programme operations, including financial and grant management, in compliance with the SGP Operational Guidelines and SGP UNOPS Standard Operating Procedures. This will include sharing of best practices based on audit findings. The lessons learned from the audit findings will be used to strengthen execution of SGP Sri Lanka Programme management, while informing its new Operational Phase (OP7).

Status: Case completed.

2021

36. Ukraine (case completed) GEF ID 5357

Project: *“Removing Barriers to increase investment in Energy Efficiency in Public Buildings in Ukraine through the ESCO modality in Small and Medium Sized Cities”* (GEF Grant USD 5,480,000)

Agency: UNDP

Date complaint received: June 2, 2021

Allegations: Failure to comply with obligations.

Date case put under formal review: June 22, 2021

Investigation Findings: Allegations unsubstantiated per OAI investigation which closed on March 25, 2022.

Management Actions: Implementation is on-going with closure expected by June 2025.

Status: Investigation completed.

Date of Case Closure: March 25, 2022

37. Viet Nam (case completed) GEF ID 5368

Project: *“Hanoi Urban Transport Development Project in Vietnam* (effective November 22, 2007”; closed December 31, 2016) (GEF Grant USD 9,800,000)

Agency: World Bank.

Allegations: The project aimed to increase urban mobility in targeted areas in Hanoi, by increasing use of public transport in selected corridors and reducing travel times, and to promote more environmentally sustainable transport modes and urban development plans for Hanoi. The project was partially supported by GEF funding. On November 11, 2013, an individual was hired under *Contract IS02c2: An International Individual Consultant to Support the BRT Component on Traffic Signal System* (“Contract IS02c2”). Contract IS02c2 was financed by the Global Environment Facility (GEF) Grant and the Japan Policy and Human Resources Development Fund (PHRD). On November 1, 2014, the individual signed a subcontract to be the Team Leader for a consultancy joint venture which had been awarded two consultancy contracts under the Danang Sustainable City Development Project. The consultancy contracts were fully financed with IBRD loans.

Investigation Findings: An investigation by the World Bank Integrity Vice Presidency (INT) found that the individual improperly influenced the tender processes under the two projects, solicited bribes, and failed to disclose his business relationship with a bidder. These are collusive, corrupt, and fraudulent practices, respectively. (See also below, Management actions)

Management actions: The World Bank imposed sanctions including debarment of an individual in connection with the collusive, corrupt, and fraudulent practices. Additional information is [here](#). The World Bank also issued a press release announcing the debarment of Spain-based Grupo Mecánica del Vuelo Sistemas, S.A.U., in connection with collusive, corrupt, and fraudulent practices, as defined by the World Bank’s Sanctions Procedures, relating to two projects in Viet Nam, including the Hanoi Urban Transport Development Project (GEF ID 2368) that was partially funded by a grant from the GEF. This project closed on December 31, 2016. The press release is publicly accessible on the [World Bank’s external website](#).

Status: Case completed.

38. Philippines (case completed) GEF ID 5271

Project: “*Global Sustainable Supply Chains for Marine Commodities*” (GEF Grant US\$5,500,000)

Agency: UNDP

Date complaint received: November 6, 2021

Allegations: Failure to comply with UNDP obligations.

Date case put under formal review: November 11, 2021

Investigation Findings: Allegations unsubstantiated based on OAI investigation which closed on June 27, 2022.

Management action: Project implementation completed. Financial closure expected in March 2024.

Status: Investigation completed.

Date of case closure: June 27, 2022.

39 - 42 Samoa (four separate projects) (case completed) GEF ID 4550, 4585, 5417, and 5731

Project 1: *“Strengthening Multi-sectoral Management of Critical Landscapes”*

(GEF Grant USD 4,736,363)

Agency: UNDP

Allegations: misconduct, unauthorized payments, and fraudulent activities

Investigation Findings: Allegations substantiated with financial loss with amount of US\$154,043.16

Management Actions: Refund to GEF processed on February 14, 2022 with amount of US\$154,043.16. Project implementation completed and was reported as financially closed to GEF Trustee in June 2022.

Status: Investigation Complete

Project 2: *“LDCF-financed Enhancing the resilience of tourism-reliant communities to climate change risks”* (GEF ID 4585; total GEF Grant USD 1,950,000)

Agency: UNDP

Allegations: same as above

Investigation Findings: Allegations substantiated with financial loss with amount of US\$139,624.86

Management Actions: Refund to GEF was processed on February 14, 2022 with amount of US\$139,624.86. Project implementation was completed and reported as financially closed to GEF Trustee in April 2020.

Status: Investigation Complete

Project 3: *“LDCF-financed Economy-wide integration of climate change adaptation and disaster risk management to reduce climate vulnerability of communities in Samoa “*

(GEF Grant USD 12,322,936),

Agency: UNDP

Implementation Findings: Allegations substantiated with financial loss. Refund due to financial loss has been processed on February 14, 2022 with amount of US\$7,899.80.

Management Actions: Project implementation completed in August 2022, and financial closure expected in December 2023.

Status: Investigation Complete

Project 4: *“GEF-financed ABS Global Capacity Program Nagoya Protocol - Strengthening human resources, legal frameworks and institutional capacities to implement the Nagoya Protocol”*

(GEF Grant USD 12,000,000),

Agency: UNDP.

Investigation Findings: Case on Samoa substantiated with financial loss. Refund due to financial loss has been processed on February 14, 2022 with amount of US\$103,088.58.

Management action: Project implementation completed and was reported as financially closed to GEF Trustee in June 2022.

Status: Investigation Complete

43. Mexico (case completed) GEF ID 5089

Project: *“Strengthening Management of the PA System to Better Conserve Endangered Species and their Habitats”* (GEF Grant USD 5,525,114). [Link](#) to Project Document

Agency: UNDP

Date complaint submitted by stakeholder: September 14, 2020

Allegations: Related to theft and embezzlement.

Date case put under formal review: September 14, 2020

Update reported to Council: 10 January 2023

Investigation Findings: UNDP reports that the OAI investigation is completed and found that the allegations are unsubstantiated.

Management Action: The project was financially closed on 22 January 2024

Status: Investigation complete – case closed

Date of case closure: December 15, 2022

44. Botswana (case completed) GEF ID 5628

Project: “Promoting production and utilization of biomethane from agro-waste in South-Eastern Botswana” (GEF Grant USD 2,632,300),

Agency: UNDP

Allegations: Related to procurement fraud against a UNDP personnel.

Investigation Findings: The OAI investigation is completed in July 2023 and found that the allegations unsubstantiated.

Management action: The project implementation completed, and financial closure expected in July 2024.

Status: Case completed

45. Pakistan (case completed) GEF ID 9231

Project: “Pakistan Snow Leopard and Ecosystem Protection Program” (GEF Grant USD 4,644,521)

Agency: UNDP

Allegations: Related to misuse of official resources against an NGO reported by the UNDP Resident Representative

Investigation Findings: The OAI investigation is completed in April 2023 and found the allegations substantiated with an estimated financial loss of US\$80,556.03 as a result of the use of funds for unauthorized purposes by a third party (NGO) within the project. The case has been referred to the Vendor Sanctions Committee after which UNDP will begin a process to attempt to recover these funds.

Management Actions: The project was suspended when the OAI case was opened and was unsuspended to restart project implementation on the 25 March 2025...

Status: Investigation completed.

46. Mexico (case completed) GEF ID 5179

Project: “Sound Mexico GEFID 5179 Management of POPs Containing Waste” (GEF Grant USD5,720,000). ([project document](#))

Agency: UNDP

Date complaint submitted by stakeholder: January 7,2022

Allegations: Related to procurement fraud.

Date case put under formal review: January 7, 2022

Investigation Findings: UNDP reports that the OAI investigation is completed and found the allegations unsubstantiated.

Management Action: Project implementation completed and financially closed in November 2023.

Status: Investigation complete – case closed.

Date of case closure: September 5, 2023

47. Ukraine GEFID 4377

Project: “Development and Commercialization of Bioenergy Technologies in the Municipal Sector in Ukraine” (GEF Grant USD 4,7000,000). (project document)

Agency: UNDP

Date complaint submitted by stakeholder: November 18, 2019

Allegations: An anonymous source made allegations of procurement fraud in the award of a training contract and in the award of a contract for the provision of boilers. In addition, the complainant alleged that grants to five NGOs and four individual contracts were unduly awarded to people/entities linked to a member of the Project Board.

Date case put under formal review: November 18, 2019

Update reported to Council: January 16, 2024; February 22, 2022; April 21, 2021; April 10, 2020

Investigation Findings: The OAI investigation was comprised of six sub cases. Two subcases were substantiated, and vendors have been included on the UNDP Vendor Sanctions list. The final four sub-cases were unsubstantiated. Cases connected to this project are now closed.

Management Action: This Bioenergy Project (GEF ID 4377) completed implementation and was reported as financially closed to GEF Trustee in May 2021. In March 2020, out of an abundance of caution, UNDP suspended a separate project in the Ukraine the Energy Efficiency in Public Buildings Project (GEF ID 5357) and initiated a full management review of the project. The management review has been completed and the Energy Efficiency project suspension was lifted, with GEF CEO concurrence, on 4 March 2021.

Status: Investigation complete – case closed, April 4, 2023

48. Morocco GEF ID 4738

Project name: “Disposal of Obsolete Pesticides including POPs and Implementation of Pesticides Management Programme”. GEF Grant USD 3,500,000 [Disposal of Obsolete Pesticides including POPs and Implementation of Pesticides Management Programme | GEF](#)

Agency: FAO

Allegations: Neighboring communities have complained about bad odors coming from storage facilities for obsolete pesticides that should be packaged and transported for destruction. The complaint was made verbally/orally and without formal written document. It was transmitted to the Executing Partner, ONSSA, National Office of Food Safety, of the Ministry of Agriculture of the Government of Morocco.

Date complaint submitted by stakeholder: complaint received in June 2025.

Date case put under formal review: June 2025.

Update reported to Council: not applicable

Investigation Findings: The complaints are related to delays in removing the stock of pesticides. Fifty percent (50%) of the targeted 736 tons of persistent organic pollutants (POPs) and pesticides have already been safeguarded or exported and safely disposed of. For the remaining stock, the storage sites remain full. This is causing odor issues that pose potential health risks and public concern.

Veolia, the contractor responsible for collection, repackaging, and export of pesticide stocks, suspended operations due to disputes over additional costs. This has led to a backlog of repackaged pesticide stocks. This suspension has created uncertainty about exporting remaining stocks by year-end, exacerbating delays in regions like Marrakech, Rabat, and Casablanca. Additionally, Veolia’s absence from Morocco has drawn scrutiny from government officials. This project is highly complex, covering 368 sites across the country.

Management Action:

The FAO Plant Production and Protection Division (NSP) in FAO Headquarters is currently negotiating with Veolia as well as with ONSSA and other private sector co-financers to agree on terms that will allow Veolia to resume the contract and complete the removal of the stock.

Mitigation action: the executing partner, ONSSA is promoting awareness-raising for the populations to avoid approaching the collection centers until the return of the service provider to the field. The population is being informed that the situation is temporary and that once the blockages are resolved the sites will be evacuated and cleaned.

Status: Active.

C. Recently Reported Cases

26. The three cases below were reported to the Secretariat in November 2025 as this Annual Report was being prepared.

49. Kenya GEF ID 10637

Project: Restoration Challenge Grant Platform for Smallholders and Communities, with Blockchain-Enabled Crowdfunding

Agency: IUCN

Date complaint submitted by stakeholder: N/A

Allegations:

In Laikipia (Kenya), limited capacity of the project to reach four women's groups (Chui mamas, Naserian, Ol Gaboli and Lotasha Ewaso) and cover their site of operations.

In Siaya (Kenya), livestock destroyed planted trees, reported by an individual beneficiary (37-year-old male), complaint by an individual (31-year-old male) about scout's communication, a beneficiary (47-year-old female) received fewer seedlings than planting capacity, an individual beneficiary (28-year-old male) disagreed about the number of surviving trees, the phone numbers of 38 beneficiaries of different age and gender were incorrectly registered. This caused a delay in receiving the M-PESA rewards.

In Turkana (Kenya) tree seedling distribution was perceived as biased with community desire for more equitable allocation (Participation/Resource Allocation), farmers expressed concerns over delay in payment processing, strong community preference for grafted fruit trees

In Moutourwa (Extreme North of Cameroon), the NGO in charge (ABIOGeT) was the one deciding on behalf of the farmers which tree species should be planted on their farms.

The number of seedlings reported as planted on farms was incorrect and the NGO was slow in recording progress in field

Date case put under formal review: N/A

Consultations/Resolution: In Laikipia (Kenya), limited capacity of the project to reach four women's groups (Chui mamas, Naserian, Ol Gaboli and Lotasha Ewaso) and cover their site of operations during past reporting period (July2023-June2024) Training was provided to two representatives from the women's groups on the My Geo Farm platform and they were equipped with two phones to serve the four women's groups and ensure their full engagement in project's activities.

In Siaya (Kenya), livestock destroyed planted trees, reported by an individual beneficiary (37-year-old male) December 2023: Replacement seedlings were supplied and advise on fencing off the farm was provided.

In Siaya (Kenya), complaint by an individual (31-year-old male) about scout's communication: January 2024: The matter was address in scouts' refresher training

In Siaya (Kenya), a beneficiary (47-year-old female) received fewer seedlings than planting capacity: March 2024: Additional seedlings were issued and verified during follow-up.

In Siaya (Kenya), an individual beneficiary (28-year-old male) disagreed about the number of surviving trees: August 2024: Field verification was carried out and the number of surviving trees was updated.

In Turkana (Kenya) tree seedling distribution was perceived as biased with community desire for more equitable allocation (Participation/Resource Allocation): October 2024: The phased rollout approach was explained to community representatives and the project representative confirmed that additional seedling distributions would take place in subsequent phases.

In Siaya (Kenya), the phone numbers of 38 beneficiaries of different age and gender were incorrectly registered. This caused a delay in receiving the M-PESA rewards: January 2025: Details corrected, verified and payment released

In Turkana, (Kenya) farmers expressed concerns over delay in payment processing: January 2025: The project staff provided immediate explanation to community representatives that payment delays resulted from an incomplete data collection process. Field trainers were advised to communicate transparently with farmers during registration. Community meeting notifications were shared to enable a direct engagement of the project.

In Turkana (Kenya), strong community preference for grafted fruit trees: January 2025: The issue was resolved through technical explanation of the need to select species adapted to the local environment. Community members engaged in the participatory species selection process. Indigenous fruit-bearing trees adapted to the landscape were provided in place of preferred grafted trees.

In Moutourwa (Extreme North of Cameroon), the NGO in charge (ABIOGeT) was the one deciding on behalf of the farmers which tree species should be planted on their farms.

The number of seedlings reported as planted on farms were incorrect and the NGO was slow in recording progress in field: August 2024: The engagement with the NGO was stopped; the recording of implemented activities is now done directly by the Alliance through facilitators on the ground located in key sites targeted by the project.

50. Vanuatu GEF ID 9847

Project: Expanding Conservation Areas Reach and Effectiveness (ECARE) in Vanuatu*ⁱ

Agency: IUCN

Date complaint submitted by stakeholder: N/A

Date case put under formal review: N/A

Allegations: Potential Involuntary resettlement

Consultations/Status: The proposed Mere-Sauwia Conservation area boundary includes a village. During a meeting with Mere-Sauwia CCA initiator, there was a proposal that the village is to be relocated. The Wilak community raised concerns about a land area covered toward the northern boundary of the Wiawi CCA boundary: August 2025: Raised this grievance with the IUCN ESMS specialist and the regional office.

The project team took note of this matter to call a meeting with the Wilack community to discuss the way forward. The proposed Mere-Sauwia Conservation area boundary includes a village. During a meeting with Mere-Sauwia CCA initiator, there was a proposal that the village is to be relocated:

February 2025: The PMU team took note of the grievance and raised it with IUCN ESMS specialist. The PMU team attempted to talk with the Shefa NAPE area council administrator to find out if he is aware of this grievance but was unsuccessful.

Status: Open / Active

51 Solomon Islands GEF ID 9846

Project: Ensuring Resilient Eco-Systems and Representative Protected Areas in the Solomon Islands

Agency: IUCN

Date complaint submitted by stakeholder: November 11, 2024

Allegations: Participation –One of the Tribal groups in Temotu Province feel that they are excluded from the PA consultations.

Date case put under formal review: N/A

Consultations/Status: Communicated with Provincial Project Coordinator to solve it at the community or tribal level. (Under processing). The matter has been taken up to the Ministry level and it was referred to the Provincial Coordinator to seek support from the tribal chief to address

it at the tribal level. The IUCN team is planning a supervision mission in early 2026. As part of the mission, the team will address the grievance and provide guidance on effective stakeholder engagement. The project has put on hold activities with the tribal group until the internal issues are solved. Hence, this has not impacted the implementation of other activities.

Status: Open / active

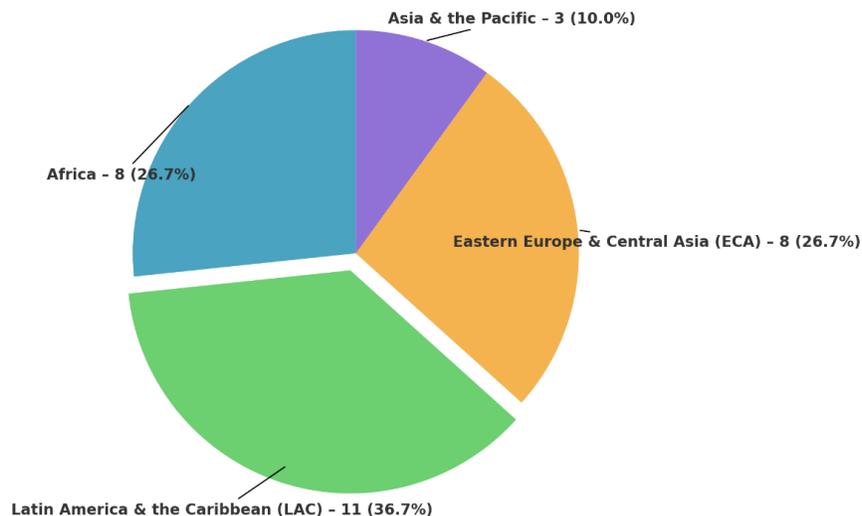
V. STATISTICAL INFORMATION - CASES UNDER CONFIDENTIAL REVIEW

27. This section provides statistical information on cases for which Agencies have indicated requirements of confidentiality, in accordance with the provisions of GEF Policy on Fiduciary Standards. As noted previously, the Policy calls for reporting of statistical information only on such cases, for reasons of confidentiality relating to the review and investigation.

28. There are 30 reported cases involving such matters for which confidentiality has been requested by the responsible Agency. To date, 20 of these cases have been completed. Of the 30 cases, 8 are in Africa, 11 are in Latin America and the Caribbean (LAC), 8 are in Eastern Europe and Central Asia (ECA) and 3 are in Asia and the Pacific.

29. The regional breakdown of the overall total of 30 confidential cases is shown visually in Figure 3 below, also indicating which countries in each region have been involved.

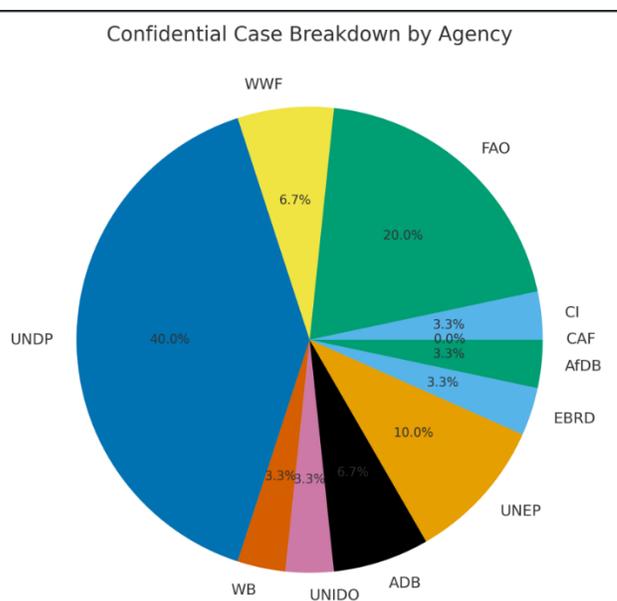
Figure 3. Regional Distribution of Confidential Cases
Regional Distribution of Cases



30. Twelve of the 30 confidential cases are implemented by one GEF partner agency (8 of which have now been completed), and the 18 others by 6 different GEF partner agencies (12 of

which have now been completed). The breakdown by agency of the overall total of 30 confidential cases is shown visually in Figure 4 below.

Figure 4. Breakdown of Confidential Cases by GEF Agency



31. Each of these cases has been previously reported to Council at the time that they were put under formal review by the Agency. This previous reporting was done under the separate reporting requirements of paragraph 15 of the Policy on Fiduciary Standards to report to Council on individual cases as soon as they are taken under formal review, and on new developments in such cases.

VI. LOG OF REPORTS TO COUNCIL ON NON-CONFIDENTIAL GRIEVANCE CASES (REAL-TIME REPORTING)

32. Set forth below is a log of reporting to Council on the non-confidential cases included in the summary above. The log tracks the reporting of each case individually when it arose, as well as new developments in the case.

33. This separate reporting to Council on an ongoing basis, reflected in the log, is done in accordance with the updated reporting requirements of the two Policies (on Safeguards and on Fiduciary Standards) for prompt, real-time reporting on new cases, as well as new developments in those cases as they arise.

Table 1. Log of Non-Confidential Cases (as of November 19, 2025)

No.	GEFID	Country	Title	Agency	Report to Council	Updates to Council	Case Status
1	9159	Congo	Integrated and Transboundary Conservation of Biodiversity in the Basins of the Republic of Congo	UNDP	3/11/2020	March 27 and June 14, 2020;	Completed
2	9155	Cameroon	Integrated and Transboundary Conservation of Biodiversity in the Basins of the Republic of Cameroon	UNDP	3/27/2020	May 29 and September 21, 2020; February 11, 2021; November 10, 2021 (Previous Annual Report)	Ongoing
3	6992	Myanmar	Ridge to Reef: Integrated Protected Area Land and Seascape Management in Tanintharyi	UNDP	3/27/2020	November 10, 2021 (Previous AR)	Ongoing
4	6942	Ukraine	Finance and Technology Transfer Centre for Climate Change (FINTECC)	EBRD	3/27/2020	9-Jan-24	Completed
5	8005	Armenia	Infrastructure and Rural Finance Support Program (IRFSP) - Sustainable Land Management for Increased Productivity (SLMIP)	IFAD	3/27/2020	n/a	Completed
6	5514	Mauritius	Mainstreaming Biodiversity into the Management of the Coastal Zone in the Republic of Mauritius	UNDP	6/17/2019	March 27, July 13, November 6, 2020, March 8, 2021	Completed
7	3980	Philippines	CTI Integrated Natural Resources and Environmental Management Sector	ADB	11/4/2020	n/a	Completed

8	8021	Zambia	Zambia Lake Tanganyika Basin Sustainable Development Project	AfDB	10/28/2020	November 10, 2021, previous Annual Report	Completed
9	9355	Tonga	Outer Island Renewable Energy Project	ADB	11/4/2020	n/a	Completed
10	9512	Tuvalu	Climate Resilience in the Outer Islands of Tuvalu	ADB	November 2021 (in Annual Summary)	n/a	Completed
11	9906	Regional (Togo)	West Africa Coastal Areas Resilience Investment Project	WB	10/6/2021	Annual Report - Jan 2024	Completed
12	9663	Colombia	The complaint relates to <i>The Private Sector and Agenda 2030</i> , which is not funded by GEF. However the complaint and the investigation reflect linkages with the <i>Sustainable Amazon for Peace Project</i> (GEF ID 9663), which is funded by GEF.	UNDP	5/11/2021		Completed
13	11279	Nicaragua	Nicaragua Mesoamerica Forest IP Project: Protection and conservation of forests of global importance located in the BOSAWAS Biosphere Reserve and the Indio Maíz Biological Reserve	FAO	10/29/2021	Annual Report - Jan 2024	Completed
14	5674	Regional (Uganda, Congo DR)	Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project	AfDB	10/19/2021	10/26/2022	Ongoing
15	10746	Solomon Islands	Strengthening Resilience of Water Supply in Honiara	ADB	1/9/2024	n/a	Completed

16	5171	Indonesia	CTI: Coral Reef Rehabilitation and Management Program-Coral Triangle Initiative, Phase III (COREMAP-CTI III)	ADB	1/9/2024	n/a	Completed
17	10188	Trinidad and Tobago	BIOREACH: Biodiversity Conservation and Agroecological Land Restoration in Productive Landscapes of Trinidad and Tobago	FAO	1/10/2024	n/a	Completed
18	5765	Regional (Mexico, Honduras, Belize & Guatemala)	Integrated Transboundary Ridges-to-Reef Management of the Mesoamerican Reef	WWF-US	1/10/2024	n/a	Completed
19	9374	Peru	Securing the Future of Peru's Natural Protected Areas	WWF-US	1/10/2024	n/a	Completed
20	10485	Gambia	Strengthening Capacity of Institutions in The Gambia to Meet Transparency Requirements of the Paris Agreement	CI	8/14/2023	n/a	Completed
21	9524	Tanzania	Supporting the implementation of integrated ecosystem management approach for landscape restoration and biodiversity conservation in Tanzania	UNEP	12/20/2023	n/a	Completed
22	9445	Mexico	Conservation and Sustainable Use of Biological Diversity in Priority Landscapes of Oaxaca and Chiapas	CI	6/6/2024	n/a	Pending
23	3216	Russia	RUS: Standards and Labels for Promoting Energy Efficiency	UNDP	12/1/2018 (UNDP briefing)	March 27, 2020; December 12 and 14, 2020; April 12, 2021,	Completed

						October 29, 2021; previous Annual Report	
24	5361	India	Market Transformation and Removal of Barriers for Effective Implementation of the State Level Climate Change Action Plans	UNDP	10/28/2020	March 15, 2021; previous Annual Report	Completed
25	4227	Afghanistan	Building Adaptive Capacity and Resilience to Climate Change in Afghanistan.	UNEP	3/27/2020	2020 November 2, 2022; this Annual Report	Completed
26	10084	Mauritius	GEF Small Grants Program (SGP) Programme in Mauritius – part of	UNDP	3/27/2020	7/6/2020	Completed
27	5886	Kyrgyzstan	Transboundary Cooperation for Snow Leopard and Ecosystem Cooperation	UNDP	11/4/2020	November 5, 2021; previous Annual Report	Completed
28	5059 & (4166)	Kazakhstan	Nationally Appropriate Mitigation Actions for Low-carbon Urban Development; LGGE Promotion of Energy Efficient Lighting in Kazakhstan	UNDP	3/15/2021	April 21, 2021, May 15, 2022.	Completed
29	4639	Zambia	Strengthening Management Effectiveness and Generating Multiple Environmental Benefits within and around the Greater Kafue National Park in Zambia	UNDP	3/15/2021	August 16 and November 5, 2021.	Completed
30	4958	Sudan	Climate Risk Finance for Sustainable and Climate Resilient Rainfed Farming and Pastoral Systems	UNDP	4/21/2021	5/19/2021	Completed
31	5307	Libya (Global)	Global Project on the Updating of National	UNEP	3/27/2020	November 2, 2022, this	Completed

			Implementation Plans for POPs			Annual Report	
32	9494	South Africa	Development of Minamata Initial Assessment in South Africa	UNEP	3/27/2020	November 2, 2022, this Annual Report	Completed
33	4377	Ukraine	Development and Commercialization of Bioenergy Technologies in the Municipal Sector in Ukraine	UNDP	3/27/2020	April 10, 2020, April 21, 2021; February 22, 2022; this Annual Report	Completed
34	6913	Uzbekistan	Market Transformation for Sustainable Rural Housing Project	UNDP	11/30/2020	5/23/2020	Completed
35	9093	Sri Lanka	GEF Small Grants Program (SGP) in Sri Lanka	UNDP	8/3/2020	November 10, 2021 (Previous AR).	Completed
36	5357	Ukraine	Removing Barriers to Increase Investment in Energy-Efficiency in Public Buildings in Ukraine through the ESCO Modality in Small and Medium Sized Cities	UNDP	2/22/2022	5/23/2022	Completed
37	2368	Viet Nam	Hanoi Urban Transport Development	WB	2/12/2021	4/27/2021	Completed
38	5271	Philippines	Global Sustainable Supply Chains for Marine Commodities	UNDP	2/22/2022	9/9/2022	Completed
39 - 42	4550 4585 5417 5731	Samoa	Four Projects: GEF- financed: Strengthening Multi-sectoral Management of Critical Landscapes in Samoa; LDCF-financed: Enhancing the resilience of tourism-reliant communities to climate change risks;	UNDP	4/24/2020	February 28, 2022, September 19,2022	Completed

			<p>LDCF-financed: Economy-wide integration of climate change adaptation and disaster risk management to reduce climate vulnerability of communities in Samoa</p> <p>GEF-financed: ABS Global Capacity Program Nagoya Protocol - Strengthening human resources, legal frameworks and institutional capacities to implement the Nagoya Protocol</p>				
43	5089	Mexico	Strengthening Management of the PA System to Better Conserve Endangered Species and their Habitats	UNDP	4/21/2021	1/18/2023	Completed
44	5628	Botswana	Promoting Production and Utilization of Biomethane from Agro-Waste in South-Eastern Botswana	UNDP	10/1/2020	6/13/2023	Completed
45	9231	Pakistan	Snow Leopard and Ecosystem Protection Program	UNDP	11/17/2021	6/13/2023	Completed
46	5179	Mexico	Sound Management of POPs Containing Waste	UNDP	5/23/2022	10/11/2023	Completed
47	4377	Ukraine	Development and Commercialization of Bioenergy Technologies in the Municipal Sector in Ukraine	UNDP	11/18/2019		Completed
48	4738	Morocco	"Disposal of Obsolete Pesticides including POPs and Implementation of Pesticides	FAO	June 2025		Open

			Management Programme".				
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Note: this log does not include the three project-level grievance cases (cases 49-51) just reported to the Secretariat, which are listed in the case summaries above.
