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**ANNUAL REPORT ON GRIEVANCE CASES
INVOLVING GEF-FUNDED PROJECTS**

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OVERVIEW

1. This document is the fourth 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 Standards.¹ 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 up-to-date information on cases from Agencies as of December 2023, in response to a request by the Secretariat. It includes cases reported in the Annual Summary to Council at its 63rd Session last year, new developments in these cases, and other cases and developments reported since that time, as required by GEF policy.
3. The Report begins with a short overview of the fundamentals and key elements of the GEF System for Conflict Resolution and Grievance Response (Section I). This section provides a re-cap of the core provisions of policy and practice on which the system is based.
4. The next two sections contain the case summaries themselves. Section II provides summary information for cases that are not subject to requirements of confidentiality.² There are 44 cases reported in this section covering the period 2017 - 2023.³ As shown in the summaries below, 37 of the 44 cases are now completed. This reflects significant progress in working through the important issues raised in these cases.
5. The cases are listed by the country in which the project takes place. They are grouped year-by-year and divided into cases involving safeguards related issues and those involving fiduciary standards issues.⁴ As shown in the summaries in Section II below, 21 of the cases involve safeguards-related matters and 23 involve fiduciary-related matters.⁵
6. Section III provides statistical information on additional cases that are subject to Agency requirements of confidentiality. There are 18 of these cases reported in this section.⁶ Six of these cases are now completed. All involve fiduciary matters where the responsible Agency has

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 (Conflict Resolution). They include two projects which receive GEF funding but where the complaint raises issues not directly tied to the GEF funding (Cases # 4 and #5 – Ukraine and Armenia) and one at the grievance mechanism of another Agency also funding the project (Case #13 - Nicaragua).

⁴ 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.

⁵ The 21 cases in the “safeguards related” category include nine 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 below.

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

indicated a requirement for confidentiality. For these cases, GEF Policy on Minimum Fiduciary Standards provides for reporting of statistical information only (paragraph II.15(f)). Additional information on these cases and status has previously been reported directly to Council.

7. Section IV provides a log of reporting to Council on individual cases when they arose, as well as on new developments in the cases. 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.

I. THE GRIEVANCE RESPONSE SYSTEM OF THE GEF

8. 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.

9. 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 projects.⁷

10. 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.

11. The first of these Policies is GEF Policy on Environmental and Social Safeguards.⁸ This Policy requires Agencies to have two complementary mechanisms for grievance response:

- *An Accountability Mechanism, focused on issues of policy compliance which is “. . . independent, transparent, and effective” and “. . . accessible and broadly advertised to Stakeholders”;* and
- *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).

⁷ See 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 GEF Policy on Environmental and Social Safeguards, Minimum Standard 2.

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

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.¹⁰

12. The second of these Policies is GEF Policy on Minimum Fiduciary Standards.¹¹ 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.*”

13. Both policies also contain explicit provisions to protect complaining individuals and parties against very real risks of retaliation and reprisal.¹² The Policy on Fiduciary Standards also has a separate standard on “Hotline and Whistleblower Protection.”¹³ Similar protections are set out in the guidelines for submitting complaints to the GEF Conflict Resolution Commissioner.¹⁴

II. CASE SUMMARIES

A. Safeguards-Related Cases (2017 – 2023)

2017/2018

1. Republic of Congo (case completed)

14. **Project:** *Integrated and Transboundary Conservation of Biodiversity in the Basins of the Republic of Congo* (GEF ID 9159), part of the Global Wildlife Program, implemented by UNDP

15. **Date complaint received:** August 2, 2018

16. **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](#).

17. **Date case put under formal review:** October 24, 2018

¹⁰ See also discussion below on challenges and opportunities in the use of collaborative problem-solving.

¹¹ GEF Policy on Minimum Fiduciary Standards, paragraph 16.

¹² 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).

¹³ Id, paragraph 16.

¹⁴ GEF Website, Conflict Resolution, noting inter alia that “*The Commissioner will at all times respect requests for confidentiality and anonymity by persons submitting complaints.*”

18. **Status and findings:** The SECU report was completed June 2020 ([final SECU report](#)) and the case closed on 17 September 2020. It found that:

- (i) 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).
- (ii) The Social and Environmental Screening Procedure (SESP) failed to identify critical project risks; as a result, Social and Environmental Standards (SES) were not implemented
- (iii) 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)

19. **Management actions:** 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. **Case completed.**

2. Cameroon

20. **Project:** *Integrated and Transboundary Conservation of Biodiversity in the Basins of the Republic of Cameroon* (GEF ID 9155), implemented by UNDP

21. **Date on which complaint was received:** August 2, 2018

22. **Summary of 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.

23. 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.

24. 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](#).

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

26. **Status of the case:** The SECU report was completed in August 2020 ([final SECU report](#)) and an Interim Monitoring report issued 27 September 2022. The SECU Report found that:

- (i) 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 (i) traditionally relied on access to Nki, a protected area determined to be part of the scope of the project, for natural resources; (ii) been significantly adversely impacted by access restrictions advanced by national law and policy; and (iii) 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.
- (ii) 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.
- (iii) The project document did not describe a project-level grievance mechanism that meets SES policy requirements.
- (iv) In September 2022, SECU released an [Interim Monitoring Report](#) and SECU will continue to monitor.

27. **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](#). As described in more detail in the Decision, in follow-up to the SECU Report and other considerations, the UNDP Administrator decided to reformulate this project for resubmission to the GEF Council for approval. The Decision indicates that the reformulated project will address the findings and recommendations of the SECU report in full. Reformulation of the project continues and is expected to conclude by the end of 2023.

3. Myanmar

28. **Project:** *Ridge to Reef: Integrated Protected Area Land and Seascape Management in Tanintharyi* (GEF ID 6992), implemented by UNDP

29. **Date complaint received:** September 20, 2018

30. **Summary of allegations:** The civil society organization 'Conservation Alliance Tanawthari (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 the [SECU registry](#).

31. **Date case put under formal review:** December 13, 2018

32. **Status of the case:** Ongoing. Second field mission due to be undertaken end February 2020 was postponed due to coronavirus travel restrictions. As a result of the COVID-19 pandemic and its inability to conduct its second field mission in 2020, SECU modified its approach to split the case into two stages and a two-part report; stage one was to focus on geography the SECU team visited during its first field mission. Stage two was to focus on geography to be visited during a second field mission. The stage one draft report's release for public comment was delayed due to the violence and political situation in Myanmar that emerged in February 2021. SECU continues to monitor the situation in Myanmar to determine when it can proceed with a public comment process on the stage one draft report, and when it can return for its second field mission to complete stage two.

33. **Management actions:** Project was suspended on December 26, 2018, and remains suspended. Further details [available here](#). SECU regularly monitors the situation on the ground to determine if and when a field mission will be possible.

4. Ukraine – Finance and Technology Transfer

34. **Project:** *Finance and Technology Transfer Centre for Climate Change (FINTECC) Ukraine*, implemented by EBRD.

- *Introduction:* This is an EBRD project/loan that has benefited from a GEF incentive grant under the EBRD GEF funded FINTECC program. The total project cost is €27 million, consisting of a €25 million EBRD loan and also includes a \$409,000 FINTECC result-based performance grant funded by the GEF. The complaint has been processed and remediation actions are underway. The complaint does not relate to the GEF-funded portion of the project.
- *The Project:* EBRD has provided a senior loan of €25 million to “PJSC Myronivsky Hliboproduct” (MHP), a Ukrainian producer of poultry meat, grain, and animal feed. The loan will be used to construct and put into operation a 10MW biogas plant in the Vinnitsa region of Ukraine. The biogas plant will utilize chicken manure and other agricultural residues from poultry and grain operations. By financing this project, the EBRD is helping MHP implement its long-term strategy to develop “green energy” capacity, become self-sufficient energy-wise, reduce its environmental footprint, and manage waste.
- *The GEF Component:* (i) GEF Funding: MHP Biogas received a \$409,000 grant under the GEF Funded FINTECC Project; (ii) Use of GEF Proceeds: Support MHP Group's strategy to improve the energy efficiency and environmental footprint of its operations, by supporting improvements in the technology for biogas production and the implementation of an energy management system. Please see the [project summary document](#).

35. **Date complaint was received:** 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](#). The Complaint can also be found in annex.

36. **Summary of allegations:** In the Complaint, 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. Complainants requested a Problem-solving Initiative be undertaken by the PCM and if not successful, a Compliance Review.

37. A similar Complaint was 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).

38. **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).

39. **Status and findings:** On June 29, 2018, a PCM Expert was appointed to conduct the Eligibility Assessment jointly with the PCM Officer and his assignment started from July 9, 2018. The Eligibility Assessment Report was completed and shared with all parties on September 25, 2018, and disclosed on the PCM Registry. Please see the following links for the Eligibility Assessment Report in [English](#). [Ukrainian](#) . 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.

40. 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 organised several bilateral meetings over the course of three years.

41. **Outcomes:** A safe space for dialogue was created for the Client and the Requesters to discuss the community concerns and expectations. During the process, Requesters and their Advisers received information on the status of the two MHP Projects, the potential environmental impacts and MHP's established mitigation measures.

42. Parties managed to achieve partial understanding on certain matters of joint concern, such as: road traffic, communication protocol, use of pesticides, land lease, and others. The Parties' capacity to engage effectively in the dialogue process and communicate constructively was str8

43. **Joint Statements:** Within the process, the facilitation team assisted the Parties in the drafting and disclosure of two joint statements to communicate progress. In January 2020, the Parties issued a first first [Joint Statement](#) summarizing the process progress to that date and interim outcomes. In May 2021, Parties issued a second [Joint Statement](#) disclosing other results obtained during the process. The statements were disclosed in the public registries of PCM and CAO and through the local media.

44. **Problem-Solving termination:** In August 2021 it became evident to the Parties 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.

45. As a result of this decision, the process was terminated as per Paragraph 2.4 c) ii of the Project Accountability Policy¹⁵. IPAM has prepared a Problem-Solving Report in consultation with

¹⁵ On July 2020, the Independent Project Accountability Mechanism took over the Case from the PCM and continued its processing now under the 2019 Project Accountability Policy, which superseded the 2014 PCM Rules of Procedure on that date.

Parties which provides a high-level summary of the process as the Parties had requested for the process and its outcomes to be confidential. **Problem Solving initiative completed.**

46. After the termination of the Problem Solving, in November 2021 the EBRD Independent Project Accountability Mechanism (IPAM) issued the [Problem Solving Summary](#) describing the outcomes of the Problem Solving and the pending concerns. IPAM then transferred the Case to the Compliance function to determine if the Case is eligible for Compliance Review.

47. 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](#).

5. Armenia (case completed)

48. **Project concerned:** The GEF-funded project is ID 8005 for the *Infrastructure and Rural Finance Support Programme (IRFSP)* in Armenia, co-financed by IFAD, another IFI and the GEF (IFAD notes that the allegations in this grievance case are not related to GEF funded components of the project).

49. **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.

50. **Summary of 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.

51. **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.

52. **Status and 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.

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

2019

6. Mauritius – Coastal Zone (case completed)

54. **Project:** *Mainstreaming Biodiversity into the Management of the Coastal Zone in the Republic of Mauritius* (GEF ID 5514), implemented by UNDP

55. **Date complaint received:** March 23, 2019

56. **Summary of 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 Environmental 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.”

57. 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.” Further details are available on the [SECU registry](#).

58. Note: this case has been considered under two different parts of the UNDP grievance response system: the Social and Environmental Compliance Unit (SECU) and the Stakeholder Review Mechanism (SRM).

59. **Date SECU case put under formal review:** June 7, 2019

60. **Status of the SECU case:** The [final SECU report](#) is completed and submitted to the UNDP Administrator (October 30, 2020). The SECU report confirmed that UNDP understood and complied with the SES, ensuring effective stakeholder participation through extended and wide-ranging consultations, while highlighting the need to achieve the widest engagement possible. Nevertheless, the report found shortcomings in meeting conservation goals of the project, and a failure to sufficiently factor in surrounding environmental risks, and that there are opportunities to do more to support the vision for conservation and effective management of fragile coastal

zones in the Republic of Mauritius, and to ensure that the project remains relevant and in compliance with the UNDP SES.

61. Specifically, the Report recommends that before its completion, the project should raise its level of ambition by supporting the Government to adopt legislation for biodiversity protection in Mauritius. It also recommends upgrading the project's risk framework to reflect new challenges to activities, including the delayed passage of legislation for biodiversity protection, weak coordination across public and private sectors, and the potential impacts on the project of the COVID-19 pandemic.

62. A monitoring plan was developed by UNDP management in response to the SECU recommendations and is awaiting closure by SECU.

63. **Management actions:** The UNDP Administrator Decision in response to the final SECU Report was issued in March 2021 (available [here](#)). In follow-up to the SECU report, as set out in more detail in the Decision, the UNDP Administrator decided to: provide technical assistance to the Government, where requested, toward the adoption of proposed legislation to protect Environmentally Sensitive Areas; revisit the project risk framework and identify preemptive measures to avert project failure; strengthen stakeholder engagement; and assure effective implementation.

64. The project Terminal Evaluation has been completed, the project is operationally closed and financial closure process is expected by January 2024. The UNDP Administrator responded to several queries from AKNL, most recently in April 2021.

65. **Date SRM case accepted:** 12 April 2019

66. **Status of SRM case:** Closed without resolution with agreement of the complainant on 6 April 2020. Further details available [here](#). **Case completed.**

7. The Philippines (case completed)

67. **Project:** This case relates to ADB project loan *Integrated Natural Resources and Environmental Management Sector Project (INREMP)* in the Philippines, associated with GEF ID 3980, implemented by the Asian Development Bank.

68. **Date complaint received (project-level grievance mechanism):** 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.

69. **Date case put under formal review; Status and findings:** Over the following months, 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.

70. 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.

71. 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. **Case completed.**

2020

8. Zambia – Lake Tanganyika

72. **Project:** *Zambia Lake Tanganyika Basin Sustainable Development Project*, GEF ID 8021, implemented by the African Development Bank.

73. **Date complaint received:** On June 16, 2020, a claim was received seeking court redress to suspend works on the site as it is used for traditional rites and as such has to remain as open land. AfDB's country office undertook a supervision mission on June 25, 2020, which noted some lapses on E&S compliance in the Environmental and Social Impact Assessment which should have been posted on the Bank website and approved by the Zambia Environmental Management Agency (ZEMA) before the civil works contract was signed.

74. On July 23, 2020, the Senior Chief of the Royal Lungu Chiefdom sent a complaint letter to the Ministry of Water Development, Sanitation and Environmental Protection, attaching an Affidavit in Support of *Ex-parte* Summons for an Order of Interim Injunction restraining the Executing Agency from taking possession of, constructing on or in any way whatsoever dealing with the property known as Subdivision A of Stand 606 Mpulungu or any other portion of Stand 606 Mpulungu in the Northern Province of the Republic of Zambia.

75. **Summary of 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.

76. **Date case put under formal review:** see above

77. **Status and findings; Management actions:** 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)

78. **Project:** This case relates to ADB project loan *Tonga Outer Island Renewable Energy Project*, which is associated to GEF ID 9355, implemented by the Asian Development Bank.

79. **Date complaint received (project-level grievance mechanism):** During training sessions in May 2020.

80. **Summary of 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.

81. **Date case put under formal review; Status and findings:** 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.

82. 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. **Case completed.**

10. Tuvalu (case completed)

83. **Project:** Tuvalu - Outer Island Maritime Infrastructure Project (ADB)

84. **Date complaint received (project-level grievance mechanism):** October 2020 - issues and concerns raised during visit of project grievance response mechanism.

85. **Summary of concerns/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.



86. **Status, Agency response:** 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. 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). **Case completed.**

2021

11. Togo (case completed)

87. **Project:** West Africa Coastal Areas Resilience Investment Project, Togo (GEF ID 9906), implemented by the World Bank.

88. **Date complaint received (project-level grievance mechanism):** August 4, 2021

89. **Summary of allegations:** The Requesters raise five areas of concern. First, they claim that they are under threat of eviction because of the project. Second, they are concerned that because of the project activities, a smaller area of the beach remains for the fishing communities to use for their activities, which has an impact on their livelihood and on the livelihood of the community overall. Third, they are also concerned about the planned involuntary resettlement and the valuation, compensation, and relocation sites related to this process. Fourth, they claim that project-affected peoples have not received adequate and timely project information and have not been meaningfully consulted about project activities. Fifth, they claim that alternatives to the physical aspects of the project were not fully analyzed.

90. **Date case put under formal review:** The Inspection Panel registered the Request for Inspection on September 7, 2021. Bank management submitted its response to the Request on October 7, 2021, and provided an update on its actions on April 19, 2022. Following an initial report and recommendation dated November 8, 2021, in which the Inspection Panel recommended deferring its recommendation on whether to investigate the project for six months, a Panel team visited Togo in May 2022 and met with requesters, government officials and project authorities to review and reassess the remedial actions committed to by Bank management and recommend to the Board whether an investigation was warranted. Based on its field observations, analysis of available documents, and discussions with various stakeholders, the Panel had remaining concerns about the Bank's compliance with the following policies: Environmental Assessment, OP/BP 4.01, Involuntary Resettlement, OP/BP 4.12, and Investment Project Financing, OP/BP 10.00. Hence, the Panel recommended carrying out an investigation. The Board approved the Panel's recommendation on June 23, 2022.

91. As per the Inspection Panel and the Accountability Mechanism resolutions, the Accountability Mechanism Secretary (AMS) offered dispute resolution to the parties (Requesters and Borrower). On August 8, 2022, the AMS reported that no agreement had been reached to pursue dispute resolution. The Panel then commenced its Investigation. The Panel disclosed its investigation plan on September 15, 2022.

92. **Status:** On April 20, 2023, the Inspection Panel submitted its Investigation Report and, on April 24 to 26, shared its findings with and explained them to the Requesters so they could participate more effectively in the Management-led consultations on its proposed remedial actions.

93. The Panel's investigation deals with concerns of the artisanal fishing communities impacted by the Project, where it found 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. Furthermore, the Panel found that the Bank's classification of the Emergency Works as Category C meant that essentially no social and environmental impact assessment was conducted, beyond the initial screening document, which in turn meant inadequate identification of impact and therefore lack of mitigation measures.

94. 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.

95. In its response, 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.

96. Further information about and documentation related to the case is available in English and French on the Inspection Panel website at <https://www.inspectionpanel.org/panel-cases/western-africa-west-africa-coastal-areas-resilience-investment-project-p162337>. **Case completed.**

12. Colombia

97. **Project:** The complaint was triggered by the communities' belief that a UNDP supported project known as *The Private Sector and Agenda 2030*, which is not funded by GEF, conflicts with another project known as the *Sustainable Amazon for Peace Project* (GEF ID 9663), which is funded by GEF.

98. **Date complaint received:** May 11, 2021

99. **Summary of allegations:** A key concern of the communities is that UNDP's support for the *Private Sector and Agenda 2030* non-GEF project will be harmful and not consistent with the needs of the *Sustainable Amazon for Peace Project* funded by GEF, and through which communities would be providing sensitive information. The complaint further alleges that the Private Sector non-GEF project poses threats to the rights of communities, compromises the trust communities had in UNDP Colombia, and otherwise violates UNDP's social and environmental standards. UNDP reports that the Siona communities were beneficiaries of the GEF-funded Sustainable Amazon for Peace Project and have since declined to participate further in this project.

100. **Date case put under formal review; Status:** September 7, 2021. As indicated in SECU's eligibility report ([eligible](#)), the complaint is eligible for a social and environmental compliance review. SECU has opened an investigation into the non-GEF Private Sector Project, which "*will focus on how the two projects intersect, identify possible non-compliance with SES, and recommend a way forward as a means of rebuilding trust with indigenous communities in the Putumayo Department of Colombia.*"

13. Nicaragua (case completed)

101. **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. ¹⁶

¹⁶ Both GEFID 10599 (*Transforming Food Systems and Reducing Deforestation in the Protected Areas and Biological Corridors landscapes from the Southern Caribbean Coast and San Juan River autonomous region*) and the GEFID

102. **Date complaint received (project-level grievance mechanism):** June 30, 2021 - submitted to Independent Redress Mechanism (IRM) of the GCF (no complaint has been received by FAO)

103. **Summary of 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.

104. **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](#).

105. **Status and findings:** Additional information on the investigation, findings and outcomes of the GCF IRM relating to this case is [here](#). **Case completed.**

14. Uganda-DRC

106. **Project:** Lakes Edward and Albert Integrated Fisheries and Water Resources Management Project (LEAF II) (Uganda-DRC), implemented by the African Development Bank (AfDB)

107. **Date complaint received:** September 14, 2021

108. **Summary of allegations:** The complaint is from a local civil society organization – human rights group working with indigenous fisherfolk. A main concern set out in the complaint relates to alleged militarization and use of force to monitor and enforce the project. According to the complaint, this has resulted in heavy-handed attacks on fisherfolk (including shootings to death), arrest of over 80 people and harassment of community members for trying to assert their right to fishing and questioning the heavy-handed enforcement of the project.

109. **Date put under formal review; Status:** October 2021. AfDB was in touch with the complainants and has initiated an investigation in response to the complaint. Departments included in the investigation involve the Safeguards & Compliance Department (SNSC), the Agriculture & Agro-industry Department (AHA), East & South Directorates General (RDGE & RDGS), the Uganda Country Office, and the GEF coordination unit.

110. Upon receipt of the complaint, AfDB requested the Executing Agency to review the source and nature of the complaint and make field verifications of the allegations. Accordingly, the government team made an in-depth assessment of the allegations and noted that the complaints

10674 (*Nicaragua Indio Maíz Biological Reserve / RBIM*) projects, both located within the San Juan Biosphere Reserve, are co-financing and are co-financed by the GCF BIO Clima project.

are general in nature and not site specific and in some instances are direct extract of issues from the appraisal report as identified during the appraisal mission. The AfDB staff did not participate in the field verification mission since it did not get security clearance.

111. The AfDB Country Manager in Uganda convened an internal meeting on 26 October 2021 among concerned staff members of the Bank to discuss the allegations that could affect the achievements made by the project. The meeting was attended by the AfDB's GEF Unit, a Civil Society Engagement Officer, the Uganda Country Programme Officer, an Agriculture Expert, and the Task Manager of the project. The meeting discussed the stated allegations and provided guidance on the preparation of the report to be submitted to the Senior Management of the Bank.

112. It was also recommended to request the AfDB's Independent Recourse Mechanism to carry out an independent investigation to establish facts in the petition against the LEAF II project. Results of the Independent Recourse Mechanism investigation will be shared with the complainant CSO. The investigation is ongoing, and the report is expected in a near future.¹⁷

2022/2023

15. Solomon Islands (case completed)

113. **Project:** Strengthening Resilience of Water Supply in Honiara (GEF ID 10746), implemented by ADB.

114. **Date of complaints and summary of case (project-level grievance mechanism):** Two grievances were registered during the ADB reporting period July 2022 – March 2023.

- 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.
- The second was received by Pacific Engineering Projects Limited (PEP), the contractor for the TrunkMains, 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. Note this grievance is under the baseline UWSSSP project but is not financed by GEF/LCDF.

¹⁷ Additional update reported to Council.

16. Indonesia (case completed)

115. **Projects:** Coral Reef Rehabilitation and Management Program – Coral Triangle Initiative (COREMAP-CTI) (GEF ID 5171), implemented by ADB.

116. **Date of complaints and summary of cases (project-level grievance level mechanism):** Nine complaints were raised by the community/ project beneficiaries during the ADB reporting period July 2022 – June 2023. The complaints related to the issues of the small infrastructures development, hand over assets issues, and permission to operate speedboat in MPA which have not been released, permit for operational mooring buoy in Gili Balu. They were all resolved by the sub-contractors, the Project Implementation Unit with coordination with the MPA stakeholders.

17. Viet Nam

117. **Projects:** Promoting Climate Resilience in Viet Nam Cities (GEF ID 6924) and Integrated Approaches for Sustainable Cities in Viet Nam (GEF ID 9484), implemented by ADB.

118. **Date of complaints and summary of cases (project-level grievance mechanism):** The complaint was also reported during the ADB reporting period July 2022-June 2023.

- The complaint related to a grant for energy efficiency for a Street Lighting System in Ha Giang (Package HG-CW-08). ADB issued a no objection letter to the Ha Giang PMU on the recommendation of the proposed bidder and contract award on September 21, 2022. The PMU has issued an invitation to the first ranked contractor to attend contract negotiations. However, due to the receipt of a complaint regarding the evaluation process, the PMU was advised by the ADB team to clarify the matters raised in the complaint with the bidders and report back. The PMU requested additional information regarding the reference contracts, and by mid-June 2023, Ha Giang PMU submitted the revised BER with recommendation to cancel the bid, finding that both bidders failed to meet the qualification criteria.
- On 12 July 2023, ADB issued no objection to the Ha Giang PMU's request to conclude the current bidding process of the package following the determination that there are no qualified bids. On July 31, 2023 one bidder submitted request for a debriefing meeting to Ha Giang PMU (ADB project team was copied) on the bidding results.
- A response letter dated August 3, 2023 from Ha Giang PMU was issued to the requesting bidder providing an explanation why such bid was not selected. Ha Giang PMU is recommended to prepare to re-bid the package and submit the updated Bidding Document to ADB for review and approval.

18. Trinidad and Tobago (case completed)

115. **Project:** BIOREACH: Biodiversity Conservation and Agroecological Land Restoration in Productive Landscapes of Trinidad and Tobago (GEF ID 10188), implemented by FAO.

116. **Date complaint received:** Email – February 2, 2023 (**project-level grievance mechanism**)
117. **Complainant:** Tableland Pineapple Farmers Association (TFPA)
118. **Summary of allegations:** In February 2023, the project received a complaint from TFPA about the non-inclusion at a Farmer’s Sub-Committee Meeting and reports of environmental damage observed at the Victoria Forest Reserve
119. **Date case put under formal review:** N/A (see below)
120. **Status and findings:** -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.
121. **Management actions:** 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.

19. Mexico, Honduras, Belize, Guatemala (case completed)

122. **Project:** *Integrated Transboundary Ridges-to-Reef Management of the Mesoamerican Reef (MAR2R)* (GEF ID 5765), implemented by WWF-US.
123. **Date of complaint:** April 2023 (**project-level grievance mechanism**)
124. **Summary of 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.
125. **Status:** SEMARNAT (the Mexican Ministry of Environment and Natural Resources) 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.

20. Peru (case completed)

126. **Project:** *Securing the Future of Peru's Natural Protected Areas (GEF6-PdP)* (GEF ID 9374), implemented by WWF-US.

127. **Date of complaint:** December 21, 2022 (**project-level grievance mechanism**)

128. **Summary of 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.

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

21. Tanzania (case completed)

130. **Project:** *Supporting the Implementation of Integrated Ecosystem Management Approach for Landscape Restoration and Biodiversity Conservation in Tanzania* (GEF ID 9524), implemented by UNEP

131. **Date complaint received:** July 2023

132. **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.

133. **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.

134. **Status and 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.

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

B. Fiduciary Standards Cases (2017 – 2023)

2017/2018

22. Russia (case completed)

136. **Project:** *Standards and Labels for Promoting Energy Efficiency in Russia* (GEF ID 3216), implemented by UNDP; and subsequent system-level audit of broader UNDP project portfolio.

137. **Date complaint was received:** May 10, 2017

138. **Summary of 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.

139. **Date case put under formal review:** May 10, 2017

140. **Status of the case:** 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. With respect to the claims of retaliation, the UNDP Ethics Office determined that there was no *prima facie* case of retaliation and therefore a formal investigation was not undertaken. These claims were further addressed by the UN Tribunal and found to be unsubstantiated. The Tribunal dismissed the case. See December 2021 UN Tribunal Judgement [here](#). These claims and related issues and concerns were also considered in an independent review dated 11 December 2020 (see Final Draft Report linked below) and response documents of UNDP management (also linked below).

141. **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](#)

142. **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](#)

143. 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](#).

23. The Gambia

144. **Project:** *Strengthening climate services and early warning systems in the Gambia for climate resilient development and adaptation to climate change – 2nd Phase of the GOTG/GEF/UNEP LDCF NAPA Early Warning Project* (GEF ID 5071), implemented by UNDP.

145. **Date complaint received:** February 15, 2018

146. **Summary of allegations:** UNDP Resident Representative reported allegations of procurement fraud against former UNDP staff member

147. **Date case put under formal review:** February 16, 2018

148. **Status and findings:** OAI opened 14 investigation cases. 3 cases closed in May 2022 and 5 additional cases were closed between February and August 2023. Another 6 cases remain opened and investigations are on-going. Financial losses likely but total amount has not been finalized.

149. **Management actions:** Project closure expected in December 2022.

24. India (case completed)

150. **Project:** *Market Transformation and Removal of Barriers for Effective Implementation of State Level CC Action Plans* (GEF ID 5361), implemented by UNDP

151. **Date complaint received:** May 9, 2018

152. **Summary of allegations:** External anonymous complaint of procurement fraud.

153. **Date case put under formal review:** May 22, 2018

154. **Status and findings:** OAI investigation closed on February 10, 2022. Case unsubstantiated.

155. **Management actions:** Project financially closed in Aug 2022. **Case completed.**

25. Afghanistan (case completed)

156. **Project concerned:** *Building adaptive capacity and resilience to climate change in Afghanistan* (GEF ID 4227) (LDCF Trust Fund), implemented by UNEP.

157. **Date complaint was received:** See below.

158. **Summary of 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).

159. **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.

160. **Status and 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.

161. **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. **Case completed.**

2019

26. Mauritius – SGP (case completed)

162. **Project:** *GEF Small Grants Programme in Mauritius*, implemented by UNDP, and executed by UNOPS

163. **Date complaint was received:** March 31, 2019

164. **Summary of allegations:** The Environmental Protection and Conservation Organisation (EPCO), 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.

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

166. **Status of the case:** **Case completed.**

167. **Findings and recommendations:** 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.

168. **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 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.

169. 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.

170. 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. **Case completed.**

27. Kyrgyzstan (case completed)

171. **Project:** *Global: Transboundary Cooperation for Snow Leopard and Ecosystem Conservation* (GEF ID 5886), implemented by UNDP

172. **Date complaint received:** July 10, 2019

173. **Summary of allegations:** UNDP staff member reported allegations of procurement fraud.

174. **Date case put under formal review:** July 29, 2019

175. **Status and findings:** OAI investigation was closed on 22 October 2021. UNDP has reported a finding of financial loss of US\$2,874.90 which arose in project procurement activities. **Case completed.**

176. **Management actions:** UNDP reports that it is taking the necessary steps to reimburse the GEF TF for the loss, working with the Trustee. Project financially closed in January 2021.

28. Kazakhstan (case completed)

177. **Projects:** (1) *Nationally Appropriate Mitigation Actions for Low-carbon Urban Development* (GEF ID 5059) and (2) *Promotion of energy efficient lighting in Kazakhstan* (GEF ID 4166), implemented by UNDP

178. **Summary of allegations:** Procurement fraud.

179. **Date case put under formal review:** October 9, 2019

180. **Findings:** OAI investigation closed on April 6, 2022. Case substantiated with no quantifiable financial loss identified.

181. **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.

29. Zambia (case completed)

182. **Project:** Strengthening Management Effectiveness and Generating Multiples Environmental Benefits within and around Protected Areas in Zambia (GEF ID 4639), implemented by UNDP.

183. **Date complaint received:** November 6, 2019

184. **Summary of 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.

185. **Date case put under formal review:** November 7, 2019

186. **Status and 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. **Case completed.**

187. **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.

30. Sudan (case completed)

188. **Project:** *Climate risk finance for sustainable and climate resilient rainfed farming and pastoral systems (GEF ID 4958)*, implemented by UNDP

189. **Date complaint received:** November 6, 2019
190. **Summary of allegations:** Related to procurement fraud
191. **Status/Findings:** OAI has determined that the allegations made in relation to this project were unsubstantiated and they have closed the case. **Case completed.**
192. **Management actions:** Project implementation completed, and financially closed in November 2022

31. Libya (case completed)

193. **Project concerned:** *Umbrella Global Project on the Updating of National Implementation Plans for POPs* (Global Project with Libyan allocation of \$169,132) (GEF ID 5307), implemented by UNEP.
194. **Date complaint was received:** November 13, 2019
195. **Summary of allegations** (and nature of claim): 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.”*
196. **Status of case and date put under formal review:** 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.
197. **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.
198. 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.
199. 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.

200. 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. **Case completed.**

32. Republic of South Africa (case completed)

201. **Project concerned:** *Minamata Initial Assessment* (GEF ID 9494), implemented by UNEP

202. **Date complaint was received:** November 26, 2019

203. **Summary of allegations** (and nature of claim): Concerns were raised to UNEP Management about a significant sole source procurement undertaken by the Executing Agency, valued at \$115,000. In 2018-2019, UNEP carried out an informal review of this procurement and acknowledged valid concerns related to the inappropriate identification, selection, and payment to a supplier, which were not in line with the project's procurement plan and UNEP's procurement policies as outlined in the legal agreement with the executing agency.

204. **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.

205. **Status and 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.

206. **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.

207. 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.

208. 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.

209. 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. **Case completed.**

33. Ukraine – Bioenergy Technologies (case completed)

210. **Project:** *Development and Commercialization of Bioenergy Technologies in the Municipal Sector in Ukraine* (GEF ID 4377), implemented by UNDP

211. **Date complaint was received:** November 15, 2019

212. **Summary of 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.

213. **Date case was put under formal review:** November 18, 2019

214. **Status and 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.

215. **Management actions:** 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. Implementation is on-going with closure expected by June 2024 (see below).

2020

34. Uzbekistan (case completed)

216. **Project:** *Market Transformation for Sustainable Rural Housing in Uzbekistan* (GEF ID 6913), implemented by UNDP

217. **Date complaint received:** March 12, 2020

218. **Summary of allegations:** Failure to comply with UNDP obligations.

219. **Date case put under formal review:** March 17, 2020

220. **Findings:** OAI investigation closed on 16 February, 2022. Case unsubstantiated.

221. **Management action:** Under implementation. Terminal evaluation planned for July 2024.

35. Sri Lanka (case completed)

222. **Project concerned:** GEF Small Grants Programme in Sri Lanka, implemented by UNDP

223. **Date complaint received:** June 30, 2020

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

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

226. **Status and 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.

227. **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). **Case completed.**

2021

36. Ukraine – Energy Efficiency (case completed)

228. **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 ID 5357)
229. **Date complaint received:** June 2, 2021
230. **Summary of allegations:** Failure to comply with obligations.
231. **Date case put under formal review:** June 22, 2021
232. **Findings:** OAI investigation closed on March 25, 2022. Case unsubstantiated.
233. **Management Actions:** Implementation is on-going with closure expected by June 2025.

37. Viet Nam (case completed)

234. **Project:** Hanoi Urban Transport Development Project in Vietnam (effective November 22, 2007; closed December 31, 2016), implemented by the World Bank.
235. **Summary of project and background facts:** 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.
236. 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.
237. **Status and 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)
238. **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](#). **Case completed.**

38. Philippines (case completed)

239. **Project:** *Global Sustainable Supply Chains for Marine Commodities* (GEF ID 5271; total GEF Grant US\$5,500,000), implemented by UNDP

240. **Date complaint received:** November 6, 2021

241. **Summary of allegations:** Failure to comply with UNDP obligations.

242. **Date case put under formal review:** November 11, 2021

243. **Findings:** OAI investigation closed on June 27, 2022. Case unsubstantiated.

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

2022/2023

39. Samoa (several projects) (case completed)

245. **Project 1:** GEF-financed *Strengthening Multi-sectoral Management of Critical Landscapes in Samoa* (GEF ID 4550; total GEF Grant US\$4,736,363), implemented by UNDP

246. **Status/Findings:** Case substantiated with financial loss with amount of US\$154,043.16

247. **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.

248. **Project 2:** LDCF-financed *Enhancing the resilience of tourism-reliant communities to climate change risks* (GEF ID 4585; total GEF Grant US\$1,950,000), implemented by UNDP

249. **Status/Findings:** Case substantiated with financial loss with amount of US\$139,624.86

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

251. **Project 3:** LDCF-financed *Economy-wide integration of climate change adaptation and disaster risk management to reduce climate vulnerability of communities in Samoa* (GEF ID 5417; total GEF Grant US\$12,322,936), implemented by UNDP

252. **Status/Findings:** Case substantiated with financial loss. Refund due to financial loss has been processed on February 14, 2022 with amount of US\$7,899.80.

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

254. **Project 4:** Global (Samoa as participating country), GEF-financed *ABS Global Capacity Program Nagoya Protocol - Strengthening human resources, legal frameworks and institutional capacities to implement the Nagoya Protocol* (GEF ID 5731; total GEF Grant US\$12,000,000), implemented by UNDP.

255. **Status/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.

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

40. Kazakhstan (case completed)

257. **Project:** *Energy efficient standards, certification, and labeling for appliances and equipment in Kazakhstan - EE S&L project in Kazakhstan under Global Platform* (GEF ID 9332; total GEF Grant US\$3,500,000), implemented by UNDP.

258. **Allegations:** Related to procurement fraud and misrepresentation, forgery and false certification.

259. **Status/Findings:** UNDP reports that the investigation of its Office of Audit and Investigation (OAI) has substantiated the allegations. UNDP further reports that no financial loss could be quantified. **Case completed.**

260. **Management action:** UNDP management suspended this project in September 2020 and has conducted several internal reviews to strengthen oversight of this project.

41. Mexico (case completed)

261. **Project:** *Strengthening Management of the PA System to Better Conserve Endangered Species and their Habitats* (GEF ID 5089; total GEF Grant US\$5,525,114), implemented by UNDP

262. **Allegations:** Related to theft and embezzlement.

263. **Status/Findings:** UNDP reports that the OAI investigation is completed and found that the case is unsubstantiated. **Case completed.**

264. **Management actions:** Project implementation completed and financially closed in November 2023.

42. Botswana (case completed)

265. **Project:** *Promoting production and utilization of biomethane from agro-waste in South-Eastern Botswana* (GEF ID 5628; total GEF Grant US\$2,632,300), implemented by UNDP

266. **Allegations:** Related to procurement fraud against a UNDP personnel.

267. **Status/Findings:** The OAI investigation is completed in July 2023 and found that the case unsubstantiated. **Case completed.**

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

43. Pakistan (case completed)

269. **Project:** *Pakistan Snow Leopard and Ecosystem Protection Program* (GEF ID 9231; total GEF Grant US\$4,644,521), implemented by UNDP

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

271. **Status/Findings:** The OAI investigation is completed in April 2023 and found the case 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.

272. **Management Actions:** The project was suspended when the OAI case was opened and remains suspended until December 31, 2023.

44. Mexico (case completed)

273. **Project:** *"Sound Management of POPs Containing Waste"* (GEF ID 5179; total GEF Grant USD5,720,000), implemented by UNDP

274. **Allegations:** Related to procurement fraud.

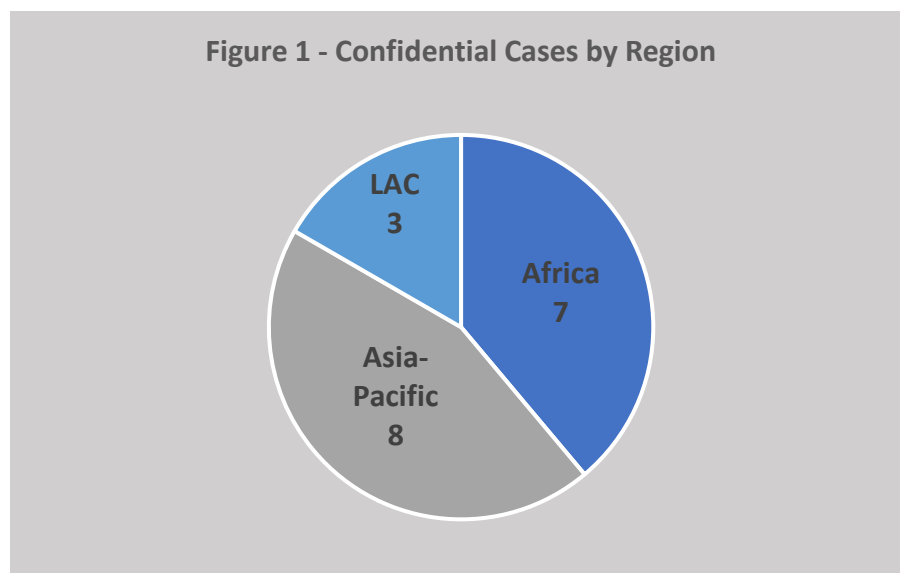
275. **Status/Findings:** The OAI investigation was closed and the case unsubstantiated.

276. **Management Actions:** The project was operationally closed in December 2022. **Case completed** September 2023.

III. STATISTICAL INFORMATION - CASES UNDER CONFIDENTIAL REVIEW

277. 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 provides for the reporting of statistical information only on such cases, for reasons of confidentiality relating to the review and investigation.

278. There are 18 reported cases involving such matters for which confidentiality has been requested by the responsible implementing Agency. Six of these cases are now completed. Of the 18 cases, seven are in Africa, three in Latin America and the Caribbean, and eight in Asia-Pacific. The breakdown by region of the overall total of 18 confidential cases is shown visually in Figure 1 below.



279. Eight of the 18 confidential cases are implemented by one GEF partner agency, and the 10 others by five different GEF partner agencies.

280. 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.

IV. LOG OF REPORTS TO COUNCIL ON GRIEVANCE CASES (REAL-TIME REPORTING)

281. Set forth below is a log of reporting to Council on the 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.

282. 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.

Project and Agency	Report to Council	Updates to Council
1. Republic of Congo - Congo Basin (GEF ID 9159), UNDP	March 11, 2020	March 27 and June 14, 2020; November 21, 2020; October 14, 2021. Completed.
2. Cameroon - Congo Basin (GEF ID 9159), UNDP	March 27, 2020	May 29 and September 21, 2020; February 11, 2021; November 10, 2021 (Previous Annual Report)
3. Myanmar – Ridge to Reef (GEF ID 6992), UNDP	March 27, 2020	November 10, 2021 (Previous AR)
4. Ukraine – Finance and Tech Center for Climate Change EBRD	March 27, 2020	January 9, 2024
5. Armenia – Infrastructure and Rural Finance (GEF ID 8005), IFAD	March 27, 2020	Completed
6. Mauritius – Coastal Biodiversity (GEF ID 5514), UNDP	June 17, 2019	March 27, July 13, November 6, 2020, March 8, 2021. Completed.
7. Philippines – Integrated Natural Resources and Environmental Management, GEF ID 3980, ADB	November 4, 2020	Completed
8. Zambia – Lake Tanganyika Basin Sustainable Development Project, AfDB	October 28, 2020	November 10, 2021, previous Annual Report
9. Tonga – Renewable Resources, ADB	November 4, 2020	Completed
10. Tuvalu – Outer Island Maritime Infrastructure, ADB	November 2021 (in Annual Summary)	Completed
11. Togo – West Africa Coastal Area Resilience Project, WB	October 6, 2021	This Annual Report. Completed.
12. Colombia – Amazon Peace Project, UNDP	October 6, 2021	This Annual Report
13. Nicaragua – BOSOWAS Biosphere Project, funded by GCF, co-financed by GEF through FAO	October 29, 2021	This Annual Report. Completed.
14. Uganda-DRC – Lakes Edward and Albert (LEAF II), AfDB	October 19, 2021	October 26, 2022

Project and Agency	Report to Council	Updates to Council
15. Solomon Islands – Strengthening Resilience of Water Supply in Honiara (GEF ID 10746), ADB	January 9, 2024	Completed
16. Indonesia - Coral Reef Rehabilitation and Management Program – Coral Triangle Initiative (COREMAP-CTI) (GEF ID 5171), ADB.	January 9, 2024	Completed
17. Viet Nam - Promoting Climate Resilience in Viet Nam Cities (GEF ID 6924) and Integrated Approaches for Sustainable Cities in Viet Nam (GEF ID 9484), ADB.	January 9, 2024	Completed
18. Trinidad and Tobago - BIOREACH: Biodiversity Conservation and Agroecological Land Restoration in Productive Landscapes of Trinidad and Tobago (GEF ID 10188), FAO.	January 10, 2024	Completed
19. Mexico, Honduras, Belize, Guatemala - Integrated Transboundary Ridges-to-Reef Management of the Mesoamerican Reef (MAR2R) (GEF ID 5765), WWF-US.	January 10, 2024	Completed
20. Peru - Securing the Future of Peru's Natural Protected Areas (GEF6-PdP) (GEF ID 9374), WWF-US.	January 10, 2024	Completed
21. Tanzania - Supporting the Implementation of Integrated Ecosystem Management Approach for Landscape Restoration and Biodiversity Conservation in Tanzania (GEF ID 9524), UNEP	December 20, 2023	Completed.
22. Russia – Standards and Labelling Project, UNDP	December 2018 (UNDP briefing)	March 27, 2020; December 12 and 14, 2020; April 12, 2021; October 29, 2021; previous Annual Report. Completed
23. Gambia – Enhancing Resilience for Vulnerable Communities, UNDP	March 27, 2020	June 4, 2021; previous Annual Report
24. India – Market Transformation for Climate Action, UNDP	October 28, 2020	March 15, 2021; previous Annual Report. Completed.
25. Afghanistan – Adaptive Capacity and Resilience (GEF ID 4227, LDCF/SCCF), UNEP	March 27, 2020	November 2, 2022; this Annual Report. Completed.
26. Mauritius – SGP Programme in Mauritius, UNDP	March 27, 2020	July 6, 2020. Completed
27. Kyrgyzstan – Transboundary Cooperation for Snow Leopard and Ecosystem Cooperation, UNDP	November 4, 2020	November 5, 2021; previous Annual Report. Completed
28. Kazakhstan - Nationally Appropriate Mitigation Actions for Low-carbon Urban	March 15, 2021	April 21, 2021, May 15, 2022. Completed

Project and Agency	Report to Council	Updates to Council
Development (GEF ID 5059) and (2) Promotion of energy efficient lighting in Kazakhstan (GEF ID 4166), UNDP		
29. Zambia - Strengthening Management Effectiveness and Generating Multiples Environmental Benefits within and around Protected Areas, UNDP	March 15, 2021	August 16 and November 5, 2021. Completed
30. Sudan – Climate risk finance, UNDP	April 21, 2021	May 19, 2021. Completed
31. Libya (Global) – Updating National Implementation Plans for POPs (GEF ID 5307), UNEP	March 27, 2020	November 2, 2022, this Annual Report. Completed.
32. South Africa – Minamata Initial Assessment (GEF ID 9494), UNEP	March 27, 2020	November 2, 2022, this Annual Report. Completed
33. Ukraine – Bioenergy Technologies (GEF ID 4377), UNDP	March 27, 2020	April 10, 2020, April 21, 2021; February 22, 2022; this Annual Report
34. Uzbekistan - Market Transformation for Sustainable Rural Housing in Uzbekistan (GEF ID 6913), UNDP	November 30, 2020	May 23, 2022. Completed.
35. Sri Lanka – SGP Programme in Sri Lanka, UNDP	August 3, 2020	November 10, 2021 (Previous AR). Completed
36. Ukraine – Energy Efficiency (GEF ID 5357), UNDP	February 22, 2022	May 23, 2022. Completed.
37. Viet Nam – Hanoi Urban Transport Development Project in Viet Nam, WB	February 12, 2021	April 27, 2021. Completed
38. Philippines - Global Sustainable Supply Chains for Marine Commodities” (GEF ID 5271), UNDP	February 22, 2022	September 19, 2022. Completed.
39. Samoa – four projects (see above), UNDP	April 24, 2020	February 28, 2022, September 19, 2022. Completed.
40. Kazakhstan - Energy efficient standards, certification, and labeling for appliances and equipment in Kazakhstan - EE S&L project in Kazakhstan under Global UNEP Platform” (GEF ID 9332), UNDP	April 21, 2021	January 18, 2023. Completed.
41. Mexico - Strengthening Management of the PA System to Better Conserve Endangered Species and their Habitats, UNDP	April 21, 2021	January 18, 2023. Completed.
42. Botswana, Promoting production and utilization of biomethane from agro-waste in South-Eastern Botswana” (GEF ID 5628), UNDP	October 1, 2020.	June 13, 2023. Completed.

Project and Agency	Report to Council	Updates to Council
43. Pakistan - Pakistan Snow Leopard and Ecosystem Protection Program” (GEF ID 9231), UNDP	November 17, 2021	June 13, 2023. Completed.
44. Mexico - Sound Management of POPs Containing Waste (GEF ID 5179), UNDP	May 23, 2022	October 11, 2023. Completed.
Eighteen other cases have been reported confidentially to Council, nine of which are completed	See statistical information in report (above)	See statistical information in report (above)