



**GREEN  
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FUND**

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**GCF/B.28/Inf.07**

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# 2020 Independent Redress Mechanism Annual Report

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## **Summary**

This is the 2020 Annual Report of the Independent Redress Mechanism (IRM). It gives a thorough review of the activities of the IRM in 2020 and insights on the IRM's future plans and activities.

## I. Introduction

1. The Independent Redress Mechanism (IRM) is mandated in paragraph 69 of the Governing Instrument for the GCF. This paragraph states that “(t)he Board will establish an independent redress mechanism that will report to the Board. The mechanism will receive complaints related to the operation of the Fund and will evaluate and make recommendations.” The IRM performs a key function within the GCF’s accountability mechanisms. The Independent Redress Mechanism reports directly to the Board and is subject to the decisions of the Board. It is independent of the Secretariat of the GCF.

2. The Updated Terms of Reference of the IRM were adopted in September 2017 by the Board. Section VII, paragraph 22 of the Terms of Reference states that “(t)he IRM will prepare an annual report on its work for presentation to the Board, and dissemination to the public.” In line with such provision, the IRM is presenting its Annual Report to the Board, covering the period of 1 January 2020 to 31 December 2020. The Annual Report is attached below as annex I.

## **Annex I: 2020 Independent Redress Mechanism Annual Report**

*The 2020 Independent Redress Mechanism Annual Report is contained below.*



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# 2020

## Going virtual and succeeding

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Independent Redress Mechanism –  
2020 Annual report



## GOING VIRTUAL AND SUCCEEDING

### Independent Redress Mechanism – 2020 Annual Report

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# MESSAGE FROM THE CO-CHAIRS OF THE BOARD



Despite a challenging year, the IRM has managed to meet its 2020 work plan and has made innovative adjustments to respond to COVID-19 challenges.

The IRM has successfully responded to an increase in its case load, ramped up its capacity building work with the grievance redress mechanisms of direct access entities, delivered on its civil society outreach mandate across the globe, and presented an important advisory report to the Board. The IRM has also contributed significantly to the institutional strengthening of the GCF by advising the Secretariat and Accreditation Panel on a range of policy and procedural matters.

The IRM's decision to convert its three-day capacity building workshop into a comprehensive virtual training course for three different regional cohorts resulted in the IRM being able to deliver grievance redress training to over 60 staff personnel of direct access entities responsible for handling grievances. These workshops, coupled with the IRM's publication of comprehensive online learning modules, which are available publicly to all accredited entities, is a significant accomplishment and contribution to a robust and responsive system for addressing concerns relating to GCF projects.

We are also pleased to see that the IRM has continued to increase its visibility among key stakeholders, despite the travel restrictions in 2020.

We wish the IRM well and assure the IRM of our ongoing support for implementing its mandate.

**Sue Szabo & Nauman Bhatti**

Co-Chairs of the Board of the GCF in 2020



# MESSAGE FROM THE EXECUTIVE DIRECTOR



The Independent Redress Mechanism plays a critical role in the Green Climate Fund's accountability framework.

As the GCF's investment portfolio grows, and more and more projects and programmes enter the implementation phase, the potential for project-related complaints and requests to reconsider funding decisions increases. The IRM has established itself, in a relatively short period of time, with procedures that are widely recognized as evidencing best practices in the field of accountability and redress. The GCF Secretariat commends the IRM for its progressiveness, and for its significant efforts in 2020 to build the capacity of the GCF's accredited entities to receive and respond to grievances relating to GCF projects.

The IRM also presented its first advisory report to the GCF Board in 2020 on preventing sexual exploitation, abuse and harassment in GCF projects, which was preceded by engagement between the IRM and the GCF Secretariat and the Secretariat providing a positive management response to the IRM. Since the presentation of the advisory report to the Board in August 2020, the IRM has had several discussions with GCF Secretariat staff and facilitated discussions between the GCF and third parties at other financial institutions on the topic of the report. This collaborative approach focused on institutional strengthening and learning is something which the GCF Secretariat commends and is committed to building on.

With a challenging year ahead as the world continues in its fight to contain the pandemic, we look forward to continued engagement with the IRM and to increasing accountability in our work.

**Yannick Glemarec**  
Executive Director, GCF



# MESSAGE FROM THE HEAD OF THE IRM



Barely had the small team of the Independent Redress Mechanism (IRM) completed its customary January retreat and planned out the activities associated with the Board approved 2020 Work Plan, than the COVID-19 pandemic burst on to the stage. The small team scattered and returned to their home countries to work remotely as the GCF closed its office except for a small core staff. All the planning done had to be re-envisioned as the pandemic continued unabated. In one case, a large international gathering to train the staff of direct access entities had to be cancelled. In complaints filed with the IRM, an eligibility inquiry and problem solving had to be conducted using virtual means. Capacity building and outreach activities had to be re-imagined and delivered through virtual means using innovative techniques to engage and motivate participants.

The year under review was a hugely challenging year for the IRM, as it was for the GCF. Thankfully, many of the digital systems that had been put in place by the GCF and the IRM served us well in making a smooth and effective transition to virtual reality. In particular, the digitization undertaken by the ICT Division of the Secretariat, putting in place electronic systems to manage core organizational functions proved indispensable. Additionally, the digital case management system the IRM had invested in proved to be effective in managing the complaints we received. The capacity building of the grievance redress mechanism personnel of direct access entities was transformed into an online course with nine modules and three-week long online regional workshops, with translations into French and Spanish. The team met weekly through virtual means.

In the final analysis, the IRM delivered results over and above those indicated in its Board approved 2020 Work Plan, training many more than originally envisaged and processing many more cases as well. As we head into 2021, the IRM has taken advantage of these adaptations, and with one additional staff member authorized by the Board, is gearing up for another year of successful performance. I thank the Board for its continued faith and trust in the IRM, the Ethics and Audit Committee for its constructive feedback, the Executive Director and the Secretariat staff for their continued support and assistance, and most of all the IRM staff, consultants and interns for their hard work, passion, dedication and sacrifice.

**Lalanath de Silva**  
Head of the IRM, GCF





# WHO WE ARE

Our mission is to provide recourse to affected people in a way that is **FAIR, EFFECTIVE** and **TRANSPARENT**.

The Independent Redress Mechanism (IRM) addresses complaints by people who believe they are negatively affected or may be affected by projects or programmes funded by the Green Climate Fund (GCF). The IRM also accepts requests for reconsideration from developing countries whose funding proposals have been denied by the GCF Board.

The IRM aims to provide recourse to affected people in a way that is fair, effective and transparent, and enhances the performance of GCF and its projects and programmes.

The IRM's main goal is to help the GCF to be faithful and accountable to its own policies and procedures. In delivering its mandate, the IRM is guided by principles of fairness, equity, independence, transparency, effectiveness, expedition and justice.

Grievance mechanisms like the IRM offer significant benefits both for the projects of the parent institution, and for potentially affected people and other stakeholders. Grievance mechanisms provide a forum for resolving disputes relatively quickly and can help to avoid project delays and costs associated with conflict. Grievance mechanisms also provide a cost-effective method for reporting complaints, and a structure for accessing a fair hearing and appropriate remedies. In 2020, the IRM has sought to bring these benefits to the foreground of discussions within financial institutions and is working to building a community of practice amongst grievance redress practitioners.

The IRM is independent of the Secretariat of the GCF and reports to the Board of the GCF on all substantive matters.

FIGURE 1. THE IRM IN THE GCF STRUCTURE



The Board of the GCF is composed of 24 Board members – 12 from developed countries and 12 from developing countries.

The IRM reports to the Board, and actively consults with the Ethics and Audit Committee (EAC), a sub-committee of the Board.

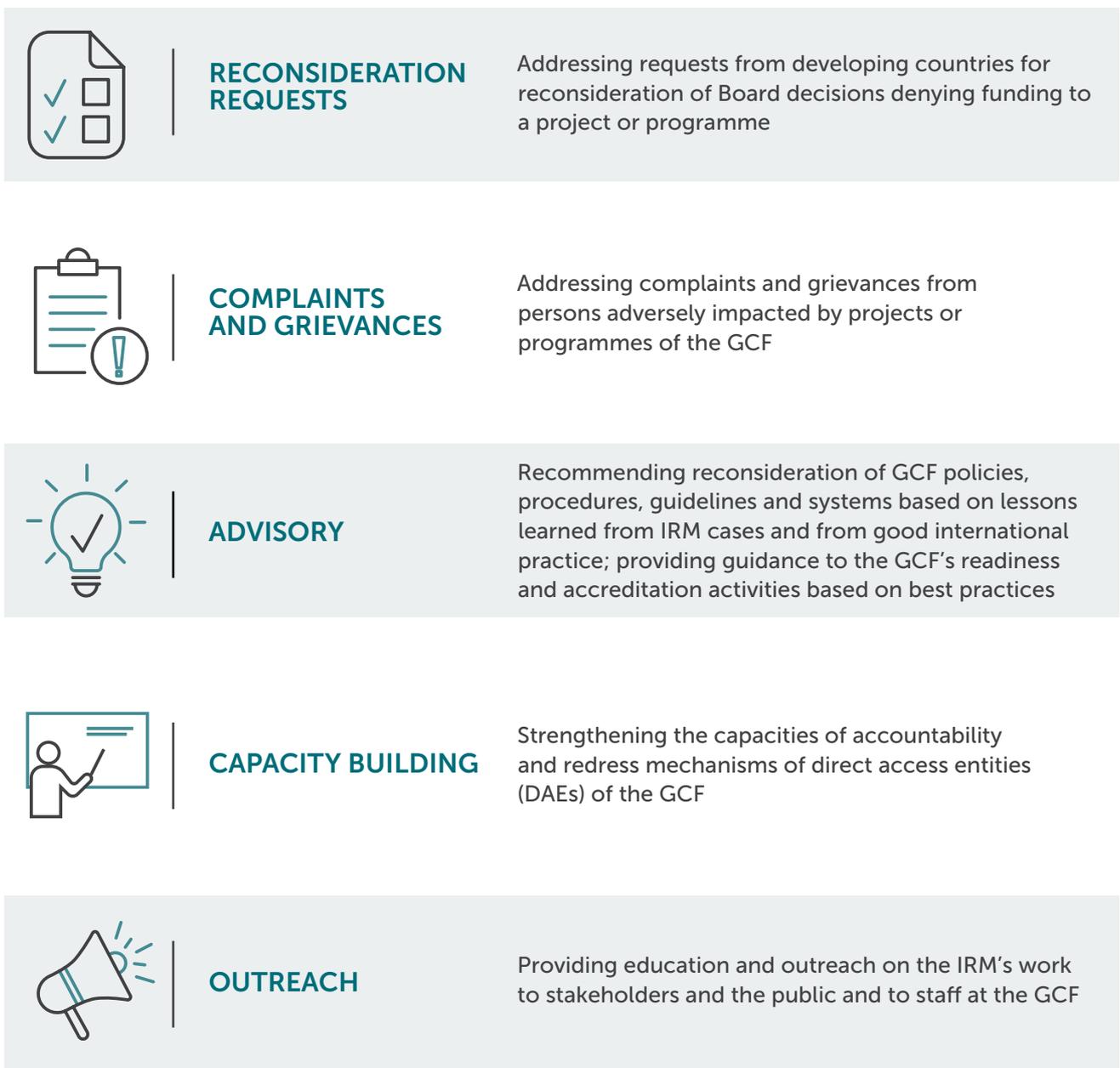


**GREEN CLIMATE FUND** | Independent Redress Mechanism



IRM Staff, Consultants and Interns for 2020

FIGURE 2. THE IRM PLAYS FIVE ROLES IN ORDER TO ACCOMPLISH ITS MISSION.



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# 2020: LESSONS FROM OPERATING THE VIRTUAL IRM

Since the establishment of the IRM and the appointment of the first Head in 2016, the IRM has been laying the groundwork for its successful operation. The IRM's Terms of Reference (TOR) were updated in 2017, and the IRM has succeeded in developing and having the Board approve its Procedures and Guidelines (PGs). The Head of the IRM has additionally issued Supporting Operating Procedures (SOPs) under paragraph 7 of the IRM's PGs as internal instructions and guidance to IRM staff on the routine implementation of the TOR and PGs. In addition to this procedural framework, the IRM has also acquired a tailored Case Management System (CMS), which allows the IRM to systematically, consistently and timely process complaints and reconsideration requests. The CMS allows the IRM to document complaints and requests from inception to closing and to collect valuable data on them.

As with other institutions, the COVID-19 pandemic created unforeseen challenges in 2020. The staff of the IRM worked remotely from their home countries from the end of February, with staff making transitions back to South Korea as circumstances and guidelines permitted. Despite the challenges of remote working, the IRM has found that having clear Terms of Reference and detailed procedures, together with systems like the CMS, have helped make the transition to virtual functioning much easier and smoother. The GCF's remote functioning operations including HR and benefits management, procurement, expense accounting and salary payments have also contributed significantly to the proven resilience of the IRM and the GCF.

While the challenges of operating the IRM from more than one location, and in more than one time zone, have at times proved difficult, the IRM is pleased to report that it has managed to deliver on its mandate and all of the commitments made in its 2020 Work Plan and Budget. While in-person events have had to be reimagined, the IRM successfully adapted its planned activities and was able to handle cases without site visits, deliver virtual outreach events, and conduct comprehensive capacity building online for an even wider audience than would have been possible with in-person events.

The pandemic, and particularly the restrictions on travel, have naturally resulted in budget underspending, and also in a dramatically reduced carbon footprint of the IRM. While the IRM does not intend to cut out travel altogether after the pandemic, the IRM has learnt that certain kinds of activities can be done successfully online and that there are many benefits to doing so. Some travel after the pandemic is over will however be necessary to connect personally with stakeholders and to address concerns regarding poor internet connectivity for certain regions and countries. What the IRM has learnt in 2020 is that a **hybrid approach, capitalising on the benefits of going virtual, while still maintaining some in-person interaction, can bring about even better outcomes in some areas of the IRM's mandate.**

Having learnt how valuable the IRM's commitment to clear processes has been during the 2017-2020 period, the IRM has continued to strengthen systems through the development of Guidelines to facilitate Board consideration of IRM reports on reconsideration requests, grievances or complaints. The development of these

guidelines was requested by the Board when it approved the IRM’s PGs in 2019. The IRM prepared the Guidelines in consultation with the Office of General Counsel and the draft was considered at several meetings of the Ethics and Audit Committee (EAC) of the Board. The EAC approved the draft Guidelines and the Co-Chairs circulated the same to the Board and Active Observers for consultation and feedback. There were no comments or feedback from Board members at that stage. Feedback from Active Observers was incorporated. The revised draft of the Guidelines was thereafter considered again by the EAC and approved for presentation to the Board for adoption at the 27<sup>th</sup> meeting of the Board. While the draft Guidelines was on the agenda of B.27, it could not be considered by the Board for lack of time. The Co-Chairs decided to circulate the draft Guidelines for adoption as a between Board meetings decision and the matter is now pending.

# IRM ROLE AND FUNCTIONS: PROGRESS REPORT

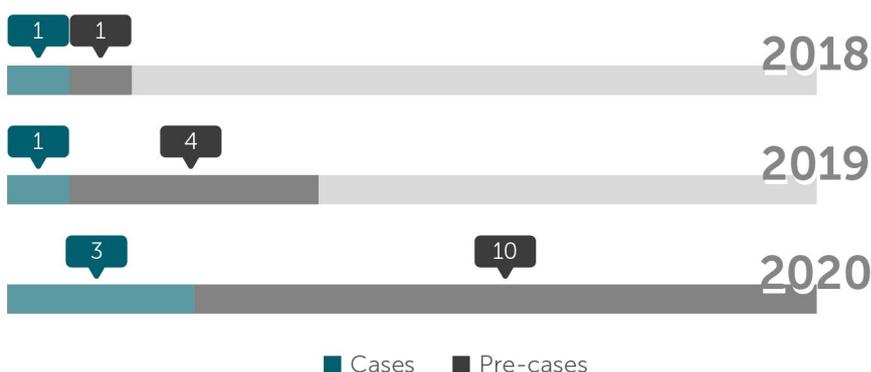
## PROCESSING COMPLAINTS AND REQUESTS FOR RECONSIDERATION

In 2020, the IRM did not receive any requests from developing countries for reconsideration of decisions of the Board denying funding to project proposals. On the other hand, the IRM has seen a significant increase in complaints from project affected persons in 2020.

In 2018, the IRM received one request for reconsideration of a funding proposal and looked into one pre-case. In 2019, the IRM processed one self-initiated inquiry, and looked into four pre-cases, and in 2020 the IRM received three complaints and looked into ten pre-cases. A pre-case is a communication from an external party to the IRM that is registered in the Case Management System as a pre-case and may or may not mature into a complaint.



Complaints & Requests



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## FP001: Building the Resilience of Wetlands in the Province of Datem del Marañón, Peru

The IRM continues to monitor the outcomes of its 2019 preliminary inquiry into FP001, Peru. A preliminary inquiry is an early phase of an IRM self-initiated investigation. A self-initiated investigation is a proceeding initiated under para 12 of the IRM's Terms of Reference (TOR) if the IRM receives information from a credible source that a GCF project or programme has or may negatively impact a community or person. The IRM concluded its preliminary inquiry into FP001 in early 2019, determining that there was prima facie evidence that the conditions set out in para 12 of the IRM's TOR for initiating an investigation were met. The IRM however agreed not to initiate proceedings under that paragraph in view of an undertaking given by the Secretariat on 1 May 2019 to implement several remedial actions. The IRM has continued to monitor the implementation of these undertakings in 2020. Out of the four undertakings provided by the Secretariat, three have now been completed - the issuance of guidance on Free Prior Informed Consent (FPIC) requirements, and on risk categorization for projects involving Indigenous Peoples, and the completion of a legal assessment/opinion examining the potential impacts of the creation of the Áreas de Conservación Ambiental (ACA) on collective land rights of indigenous people who are part of the project. The AE has reiterated and assured both the IRM and the GCF Secretariat that it will take into account all of the requirements to document the FPIC process and carefully manage the establishment of the ACA in line with the recommendations of the legal opinion and the GCF guidance that has been issued. The IRM continues to monitor the fourth undertaking – which is for the GCF Secretariat to ensure that the consent documentation submitted by Profonampe for the establishment of the ACA is complete and compliant with the guidance. The IRM received a progress report from the GCF Secretariat on 31 December 2020 indicating that there had been no update regarding the establishment of the ACA due to the COVID-19 restrictions that have not allowed the project to organise participative processes and consultations. Overall, and within a relatively short timeframe, significant institutional and project-level improvements have been made based on the recommendations of the IRM, thus averting a dispute that might otherwise have lingered and escalated to become a reputational risk to the GCF.

## FP043: The Saïss Water Conservation Project in Morocco

In February 2020, the IRM received a complaint relating to FP043. The complaint centers around the insufficiency of the community consultations conducted and the lack of information provided to the complainant(s) and others who are affected by this Project. The complainant(s) requested confidentiality, and the IRM is providing confidentiality in accordance with its Procedures and Guidelines. The complaint was declared eligible for further processing, and the parties agreed to seek a joint solution through a problem-solving process. It is hoped that this participatory and voluntary approach of problem-solving will assist the parties to address the concerns raised by the complainant(s) in a way that is satisfactory to all parties involved in the process. The Initial Steps Report detailing the outcomes of this phase is available on the IRM's website.<sup>1</sup> The COVID-19 pandemic, and more specifically restrictions on travelling to Morocco, have resulted in unavoidable delays in the processing of this case. Problem solving is ongoing, despite the challenges associated with conducting such a process virtually.

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<sup>1</sup> Available at: <https://irm.greenclimate.fund/sites/default/files/case/c0003-morocco-irm-initial-steps-22-june-2020-website-publication.pdf>





## FP084: Enhancing climate resilience of India's coastal communities

In May 2020, the IRM received a complaint relating to FP084. The complaint was about the clearance of mangroves for the development of a housing scheme in Andhra Pradesh. The complainant(s) alleged that the GCF should have taken steps to stop the felling of mangroves because the GCF has a project in the state of Andhra Pradesh which claims to be conserving mangroves. In July 2020, the IRM declared the complaint ineligible because the felling of the mangroves for the housing scheme did not occur within the FP084 project area, nor was the felling conducted by the Accredited Entity. The IRM's eligibility determination setting out the reasons for its assessment of ineligibility is available on the IRM's website.<sup>2</sup> The complaint was also referred by the IRM to the Accredited Entity's grievance redress mechanism, the Social and Environmental Compliance Unit (SECU), at the request of the complainant(s). As at 31 December 2020, SECU had not yet determined whether the complaint was eligible for further processing under SECU's procedures.<sup>3</sup>

## FP098: DBSA Climate Finance Facility

A third formal complaint was received in August 2020 but has been suspended at the request of the complainant(s). Through discussions with the complainant(s) it emerged that the primary goal of the complainant(s) at this stage was to obtain more information about the GCF project, and upon receiving information about the GCF's Information Disclosure Policy and the procedures for requesting information from the GCF Secretariat, the complainant(s) requested that the complaint be suspended pending the outcome of the complainant(s) utilizing the request for information processes. The complainant(s) is at liberty to re-activate the complaint at a later date, if the complainant(s) wishes. The IRM will not report on this case in future reports unless it is re-activated by the complainant(s).

## ADVISORY

The IRM is mandated to recommend to the Board reconsideration of policies, procedures, guidelines and systems based on lessons learned from the IRM's work and from good international practice and provide guidance to the GCF's readiness and accreditation activities based on best practices.<sup>4</sup>

In 2019, the IRM prepared an advisory report on the prevention of sexual exploitation, harassment and abuse (SEAH) in GCF funded projects, containing learnings and recommendations based on complaints which were filed with the Inspection Panel of the World Bank Group. The IRM's advisory report, together with the GCF Secretariat's management response, was presented to the GCF Board at the 26<sup>th</sup> meeting of the Board. Overall, the IRM received very positive comments from the Board and Active Observers. Since the 26<sup>th</sup> meeting of the Board, the IRM has had several consultations and exchanges with staff from the Secretariat's Office of Risk Management and Compliance and the Office of the General Counsel to discuss the advisory report and



<sup>2</sup> Available at: <https://irm.greenclimate.fund/sites/default/files/case/c0004-india-eligibility-determination-final-publication.pdf>

<sup>3</sup> SECU's case page related to the complaint is available at: <https://info.undp.org/sites/registry/secu/SECUPages/CaseDetail.aspx?ItemID=32> An update in this case became available on 14 January 2021, when SECU declared the complaint eligible for further processing. The eligibility determination is publicly available on the SECU website: [https://info.undp.org/sites/registry/secu/SECU\\_Documents/SECU0014\\_%20Eligibility%20Determination\\_Final7d1398a4c104412397f3883f9d403d29.pdf](https://info.undp.org/sites/registry/secu/SECU_Documents/SECU0014_%20Eligibility%20Determination_Final7d1398a4c104412397f3883f9d403d29.pdf)

<sup>4</sup> Paragraph 16 of the IRM's Updated Terms of Reference, 2017.

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the lessons which can be incorporated into the review of the updated SEAH policy. The IRM also facilitated discussions between Secretariat staff, the Secretariat's SEAH consultant and third parties at other financial institutions including the Inspection Panel of the World Bank and the Conflict Resolution Commissioner of the Global Environmental Facility who could offer advice and experience on the subject of addressing risks of SEAH institutionally and in projects. The Secretariat has thanked the IRM for its efforts and acknowledged that the advisory report, as well as the interactions had with or facilitated by the IRM, have been extremely useful to the Secretariat in developing its recommendations to the Board on the revision of the SEAH Policy. In the Secretariat's Technical Assessment of the SEAH Policy Report,<sup>5</sup> submitted to the Board as an information document at the 27<sup>th</sup> meeting of the Board in November 2020, the Secretariat's independent consultant makes multiple references to the IRM's Advisory Report, with many of the recommendations to the Board mirroring those made by the IRM. The IRM's Advisory Report was also cited by the World Bank in its Emerging Lessons Series No. 6, Insights of the World Bank Inspection Panel: Responding to Project Gender-Based Violence Complaints Through an Independent Accountability Mechanism.<sup>6</sup>

The IRM also sought to address, through a letter to the Executive Director, what it regards as accountability and transparency gaps in the GCF's programmatic approach. Programmes are approved by the GCF Board with too little information and details regarding the subprojects that will later be implemented. Once subprojects are identified by the Accredited Entities, information concerning these subprojects is not easily accessible by the public, and the link between these subprojects and the GCF is not made obvious enough in the public domain. This is problematic for the IRM both in terms of how this situation hinders access to the IRM (if potential complainants do not connect the subprojects to the GCF) and the lack of information on subprojects impedes the IRM's outreach function, as it is not able to take the location of subprojects into account when planning appropriate regions in which to conduct outreach activities. The IRM continues to dialogue this issue within the GCF, with a view to increasing transparency around subprojects.

In 2020 the IRM also worked collaboratively with the other two Independent Units, the Independent Integrity Unit (IIU) and the Independent Evaluation Unit (IEU), and the Secretariat to provide advice and feedback on a range of policy documents, including inputs into the GCF Corporate Procurement Manual, Finance Manual, Programming and Operations Manual, Employment Handbook for Grievances, Peoples' Plan, numerous IEU draft evaluation reports and the IIU's Policy on the Protection of Whistleblowers and Witnesses Implementation Report.

The IRM also provides advice on the development of Administrative Instructions (AIs) for GCF staff when called upon to do so, and when appropriate.



## CAPACITY DEVELOPMENT OF DIRECT ACCESS ENTITY GRIEVANCE MECHANISMS

One of the key new functions entrusted to the IRM by the Board in the updated 2017 TOR is that of capacity building for the grievance redress mechanisms (GRMs) of Direct Access Entities (DAEs). The GCF currently has around 59 DAEs and all of them are expected to have a grievance redress mechanism at the institutional level. However,

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<sup>5</sup> Available at: <https://www.greenclimate.fund/sites/default/files/document/gcf-b27-inf12-add01.pdf>

<sup>6</sup> Available at: <https://inspectionpanel.org/sites/inspectionpanel.org/files/publications/Emerging%20Lessons%20Series%20No.%206-GBV.pdf>

the IRM’s research had shown that such GRMs, in the case of some DAEs, were either non-existent, weak or lacked capacity. The new Board mandate to the IRM is critical in ensuring that GRMs are in place, and appropriately structured, so that accountability exists at all levels and conflicts and disputes at the project level can be addressed properly by DAEs.

GCF has around  
**59 DIRECT  
ACCESS  
ENTITIES.**

The IRM had planned to host a three-day workshop from 6-8 April 2020 to bring together GRMs of DAEs, international accountability mechanisms, CSOs, academics and other grievance redress and accountability practitioners to share experiences and knowledge, provide training to GRMs and to learn from each other. Extensive preparations for this workshop were underway, but the IRM took the decision to cancel the workshop given the global COVID-19 pandemic. The IRM capitalised on the opportunities offered by virtual platforms, and instead re-purposed and designed comprehensive regional training workshop for GRMs of DAEs.

Three regional workshops of three weeks each were conducted for Latin America and the Caribbean in July; Africa in August/September; and Asia and the Pacific in October 2020. Going virtual allowed the IRM to train substantially more participants than the commitment made in its 2020 work plan to train 30 participants in Songdo. In total, over 60 participants from 40 countries attended the three courses. Going virtual also meant that the training could be more comprehensive, given the ability to stretch the workshop over a three-week period with participants required to complete online learning modules prepared by the IRM. Participants who successfully completed the online modules and who attended all of the workshop sessions received a prestigious certificate carrying the logo of the IRM, the Consensus Building Institute, and the Harvard-MIT Public Disputes Program. The workshops received positive feedback from the participants and were rated as being extremely informative and comprehensive.<sup>7</sup>

In addition to the online nine modules serving as a key tool for learning during the IRM’s capacity building workshops, the modules are also publicly available on the GCF’s iLearn platform for all accredited entities and any member of the public interested in learning about how to set up and implement an effective GRM.<sup>8</sup>

The IRM also used the opportunity of the online trainings to promote the creation of a community of practice amongst grievance redress practitioners. This community of practice is discussed in more detail under the heading “working with partners” as these efforts, while spearheaded by the IRM, have been undertaken in collaboration with the members of the GRAM partnership.



<sup>7</sup> The IRM has interviewed workshop participants and compiled short videos on the feedback received, which are available at: <https://irm.greenclimate.fund/resources/multimedia>

<sup>8</sup> Learning modules available at: <https://ilearn.greenclimate.fund/thematicarea/detail?id=8>.



## COMMUNICATIONS & OUTREACH

The IRM has a mandate to provide education and outreach on the IRM's role and work to stakeholders and the public and to staff at the GCF.

In early 2020, the IRM finalised its updated Communications Strategy. As part of this revised communications strategy, the IRM identified a list of GCF projects to prioritise for IRM outreach activities based on the level of risks involved in the projects, the disbursement rates, and the size of the projects. Given the travel restrictions occasioned by the COVID-19 pandemic, the IRM conducted its 2020 outreach activities virtually. The IRM hosted, and in the case of Brazil participated in, a total of five outreach events in 2020, each of which are described in more detail below. In addition to dedicated outreach events, the IRM also capitalised on opportunities offered through the proliferation of virtual events, and made presentations and engaged participants at a number of relevant online conferences, including the International Conference on Community-based Adaptation to Climate Change and at side events for members of the Environmental Law Alliance Worldwide (ELAW), and civil society stakeholders involved in monitoring the work of the members of the Independent Accountability Mechanisms Network (IAMnet) and providing assistance to affected communities.

### South Africa

The IRM had planned to host an outreach event for civil society organizations (CSOs) in the Southern African region (together with the independent accountability mechanisms of the World Bank, African Development Bank, and the International Finance Corporation) in March 2020. This event was postponed due to COVID-19 concerns and restrictions. Given that participants for this workshop had already been identified and invited, the IRM decided to instead reach out to confirmed participants and set up one-on-one video calls to still deliver on its mandate.<sup>9</sup>

### Pacific Islands

In June 2020, the IRM hosted its first online outreach event for the Pacific region. This event was well attended (23 participants from Fiji, Philippines, Australia, Indonesia, Papua New Guinea, Vanuatu, Marshall Islands, and Tonga), and included both information sessions, and interactive working sessions using online polling functions. The IRM also made use of breakout rooms in its online platform, so that smaller group discussions could still be accommodated as part of the agenda.

### Brazil

In September 2020, the IRM joined forces with five accountability mechanisms in organising an accountability and redress outreach webinar for Brazil. 48 participants from ten Brazilian states attended the event. Most of them were NGO representatives or academics, with some community leaders also participating. The IRM's presentation focused on self-initiated investigations. The presentation explained the first IRM Latin-American case, in Peru. Overall, participants and organizers felt that the webinar was successful in informing Brazilian civil society about the IAMs and listening to their perspectives and concerns.

### Mongolia

With over 9 programmes and projects across different risk categories, Mongolia falls under the IRM's list of priority countries for conducting outreach workshops. In the last week of September, the IRM conducted a virtual outreach workshop in collaboration with its partners OT Watch (Oyu Tolgoi Watch), MONES (Mongolian Women's Fund) & DHF (The Development Horizons Foundation). The virtual workshop was well attended

<sup>9</sup> See: <https://irm.greenclimate.fund/news/outreach-time-corona>



with over 65 participants joining in from different regions of Mongolia. The IRM made use of a number of innovative tools to increase participation and engagement with the subject matter, including live, simultaneous interpretation into Mongolian (as well as translation of all of the IRM's information materials, and its presentations into Mongolian). The use of interactive polls, quizzes around the content of the presentations, and allocating breakout rooms as a part of the presentations also served to increase participation. For the CSO experience sharing session, the IRM invited two local speakers who have had experiences accessing the grievance redress mechanisms of other financial institutions.

The IRM also experimented with the use of cartoons to represent issues around grievances and redress, which was enthusiastically received by the participants. The collaboration with professionals from Cartoon Collections, who sketched live cartoons based on the discussions, allowed for candid reflections and solicited interesting responses from the participants. Employing new and innovative techniques to engage participants online have allowed the IRM to improve the effectiveness of its trainings and outreach workshops.

### Central Asia

The GCF is scaling up its portfolio across the Central Asian region. In October, participants from the Central Asian countries of Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan joined the IRM and its local partner – the Socio-Ecological Fund (SEF) – for a 1-day workshop. This event brought together CSOs and other stakeholders from across the region. Based on our previous experiences, the IRM used pre-recorded presentations in Russian to reduce technical challenges and allow sufficient time to engage in meaningful dialogue and discussions. These pre-recorded presentations were also specifically designed as information tools that could be disseminated widely after the workshop to the participants' broader networks. For this workshop, the IRM also spent considerable time discussing concerns and challenges that CSOs in Central Asia may face while filing complaints, particularly regarding the risks of retaliation.

In order to increase awareness and the reach of the IRM's communications, the IRM has also ramped up its social media presence in 2020 and is actively posting on Facebook and Twitter. The IRM also has a YouTube channel, and has produced a number of videos on topics including how and when to file a complaint, the benefits of having a grievance mechanism, interviews with participants from the IRM's capacity building



workshops, and a compilation of comments received on the IRM’s advisory report at the 26<sup>th</sup> meeting of the Board.

In addition to its external communications, the IRM has also started a new series of virtual inreach events (i.e. events for GCF colleagues) called the IRM’s Dialogue and Learning Forum. The goal of these events is to foster collaboration, trust and understanding within the GCF and its staff and to encourage institutional learning. The IRM has hosted two such events. The first event held in July 2020, was a discussion centred around complaints received by the IRM and critical questions that arose in relation to those complaints. The second event was held in early October on the external review of the IFC’s environmental and social accountability, including the mandate and functioning of the Compliance Advisor Ombudsman (the IFC’s accountability and redress mechanism). For this event the IRM invited a guest speaker, Professor Arntraud Hartmann, one of the members of the external review team. Both events were well attended and stimulated dialogue and learning amongst GCF colleagues. The IRM also partnered with the Office of the General Counsel and gave a lunch talk in December 2020 concerning updates in the controversial *Jam v IFC* case,<sup>10</sup> and the connection between that case and the external review of the IFC’s environmental and social accountability. Lessons for the GCF were drawn, shared and discussed amongst GCF colleagues.

# WORKING WITH PARTNERS

## INFORMATION APPEALS PANEL

The Heads of the three Independent Units at the GCF make up the Information Appeals Panel (IAP) established under the GCF’s Information Disclosure Policy (IDP) and related Board decisions. Information disclosure requests which are made to the GCF Secretariat under the IDP and which are denied, may be appealed to the IAP. In May 2020, the CSO Active Observer team submitted a request for information to the GCF. The request was for limited information about funding proposals that may come up for consideration at the 26<sup>th</sup> and 27<sup>th</sup> meetings of the GCF Board. The GCF Secretariat denied access to this request and the CSO team escalated this issue to the IAP, which recommended that the information be released.<sup>11</sup> The Executive Director gave his final decision on the appeal on 30 October 2020, disagreeing with the IAP’s recommendation and maintaining the GCF Secretariat’s decision to deny access.<sup>12</sup> At the 27<sup>th</sup> meeting of the GCF Board, the Head of the IRM commented on the need to align the GCF’s Information Disclosure Policy with international best practice, which is to give the appeals panel authority to issue binding decisions.

<sup>10</sup> Supreme Court decision available at: [https://www.supremecourt.gov/opinions/18pdf/17-1011\\_mkhn.pdf](https://www.supremecourt.gov/opinions/18pdf/17-1011_mkhn.pdf). Subsequent District Court decisions available at: [https://ecf.dcd.uscourts.gov/cgi-bin/show\\_public\\_doc?2015cv0612-61](https://ecf.dcd.uscourts.gov/cgi-bin/show_public_doc?2015cv0612-61) and [https://ecf.dcd.uscourts.gov/cgi-bin/show\\_public\\_doc?2015cv0612-78](https://ecf.dcd.uscourts.gov/cgi-bin/show_public_doc?2015cv0612-78)

<sup>11</sup> Available at: <https://www.greencclimate.fund/document/decision-and-recommendations-appeal-no-idp-2020-c002>

<sup>12</sup> Available at: <https://www.greencclimate.fund/document/final-decision-regarding-appeal-no-idp-2020-c002-relation-idp-request-no-071>

IRM has

**20**  
**MEDIATORS,**  
**24**  
**SUBJECT**  
**EXPERTS** and  
**43**  
**TRANSLATORS.**

## ROSTER OF EXPERTS

As reported in the IRM's 2019 Annual Report, the IRM has developed three rosters of subject experts, mediators and translators to assist it in its work, particularly in relation to case investigations. On its rosters, the IRM currently has 20 mediators, 24 subject experts, and 43 translators (Spanish, French, Arabic, Mandarin, Russian, Portuguese, Turkish and Farsi). The IRM will continue to recruit for its rosters on a rolling basis until it has sufficient expertise in all key areas identified.

## INDEPENDENT ACCOUNTABILITY MECHANISM NETWORK

With Board approval, the IRM joined the Independent Accountability Mechanisms Network (IAMnet) in February 2017. IAMnet is a community of practice for accountability mechanism practitioners. There are over 40 accountability mechanisms of international financial institutions and multilateral and bi-lateral development funds, and a significant number of the independent redress mechanisms of the current accredited entities are members of this network. The IRM will continue to actively participate in IAMnet, including attending its annual meeting and serving on working groups to develop good practices, collaborate on outreach activities, and implement governance reforms. The IRM participated in the IAMnet's XVII annual meeting which took place virtually on 23 and 24 September 2020 and was hosted by the Independent Consultation and Investigation Mechanism of the Inter-American Development Bank and the Compliance Advisor Ombudsman of the International Finance Corporation.

## LAUNCHING THE GRAM PARTNERSHIP

In 2019, the IRM formed the Grievance Redress and Accountability Mechanism (GRAM) partnership to offer leadership, a learning and knowledge platform and a meeting space to an increasing number of GRAMs that are emerging in different spheres. On the 1<sup>st</sup> of December 2020, the IRM hosted a virtual soft launch event of the GRAM partnership focusing on mapping the different GRAM practitioners and on the implementation of the UN Guiding Principles' effectiveness criteria for grievance mechanisms. The event was well attended with over 100 participants, engaged in active debate around what it means to be an effective grievance mechanism and how we can learn from each other as grievance redress mechanism practitioners.

# THE FUTURE: LOOKING AHEAD TO 2021



**Handling cases:** The IRM's case load increased substantially in 2020. The IRM looks forward to completing the monitoring phase of its self-initiated inquiry into FP001 and hopes to conclude problem solving in relation to the complaint received regarding FP043. The IRM stands ready to receive any new complaints in 2021.



**Capacity building:** The IRM looks forward to developing specific training for DAEs and AEs in community-corporate mediation that will be

added to the current curricula and contents of the IRM’s trainings. The IRM also plans to upgrade its current learning modules for grievance mechanisms. Aside from having adequate trainings and materials, the IRM will facilitate a community of practice in the field of Grievance Redress Mechanisms which will assist the grievance redress mechanism staff of DAEs and other AEs to improve their skills and exchange knowledge and information on handling complaints from project affected people. The IRM will also support DAEs by contracting an expert consultant to provide tailored advice on specific topics identified to help strengthen their grievance mechanisms.



**Outreach:** The IRM will continue to conduct virtual outreach events in 2021 and will seek to expand its accessibility amongst relevant stakeholders. The IRM plans to host four virtual outreach events in 2021 and has also budgeted for one in person outreach trip (to be conducted in parallel to providing capacity building for direct access entities). The IRM will also be contracting a high-level communications expert to assist the IRM on a part-time basis. This consultant will act as a key advisor and assist the IRM in the revision and implementation of its communications strategy.



**Lessons Learned:** The IRM will prepare, as appropriate, advisory reports in 2021 for presentation to the Board. The IRM will also continue to work collaboratively with the other two Independent Units and the Secretariat to provide advice and feedback on a range of policy documents. The IRM will also continue to push for greater transparency in relation to project information, particularly concerning the subprojects that are implemented under GCF programmes.

# CONCLUSIONS

Despite the COVID-19 pandemic, the IRM has managed to significantly ramp-up its activities in 2020. The IRM capitalised on the opportunities of going virtual, training over 60 DAE participants in grievance handling processes, and conducting virtual outreach workshops for over 190 participants. The IRM also launched the GRAM partnership and is excited about building and sustaining this community of practice. The GRAM partnership has already attracted much attention from practitioners, with over 100 participants joining the soft launch in December 2020.

The IRM received the most cases and pre-cases in 2020 as compared to any other year of operation and stands ready to address more grievances and complaints.

The IRM works consistently to hold the GCF accountable, both in relation to specific complaints received, and in relation to the advice that it provides to the GCF Board, Secretariat and other Independent Units.

The IRM is confident that it is ready to meet the challenges associated with handling complaints and requests for reconsideration with the support of the Board, the GCF Secretariat and other GCF stakeholders, including accredited entities and their grievance redress mechanisms, and civil society organisations.



# APPENDIX 1

## BOARD APPROVED WORK PLAN AND BUDGET FOR 2021

Please visit this link:

<https://irm.greenclimate.fund/document/work-plan-and-budget-2021>

# APPENDIX 2

## INDEPENDENT REDRESS MECHANISM BUDGET 2020

BUDGET EXECUTION AS AT 31 DECEMBER 2020 (IN USD)

	2020 APPROVED BUDGET	ACTUAL EXPENDITURE TO 31 DECEMBER 2020	BALANCE	% SPENT
<b>3.1 Staff, Consultants and Interns Costs</b>				
3.1.1 Full-time Staff	759,893	680,347	79,546	90%
3.1.2 Consultants & Interns	136,820	73,809	63,011	54%
<b>Sub-total: Staff, Consultants and Interns</b>	<b>896,713</b>	<b>754,156</b>	<b>142,557</b>	<b>84%</b>
<b>3.2 Travel</b>				
3.2.1 General	56,433	6,905	49,528	12%
3.2.2 Travel associated with complaints/request	95,160	-	95,160	0%
<b>Sub-total: Travel</b>	<b>151,593</b>	<b>6,905</b>	<b>144,688</b>	<b>5%</b>
<b>3.3 Contractual Services</b>				
3.3.1 Contractual Services	45,240	74,073	(28,833)	164%
3.3.2 Operating costs	196,692	16,317	180,375	8%
3.3.3 Information, Communication and Technology	31,000	31,000	-	100%
<b>Sub-total: Contractual Services</b>	<b>272,932</b>	<b>121,390</b>	<b>151,542</b>	<b>44%</b>
<b>Grand total (1+2+3)</b>	<b>1,321,238</b>	<b>882,451</b>	<b>438,787</b>	<b>67%</b>

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# APPENDIX 3

## IRM TEAM PROFILES



**LALANATH DE SILVA**  
HEAD OF UNIT

Dr. Lalanath de Silva is the Head of GCF's Independent Redress Mechanism. Lalanath has extensive experience in legal affairs, with 37 years of service as a practicing lawyer. In Sri Lanka, he supported the Ministry of Environment as a legal consultant, and was a member of his country's Law Commission. Lalanath previously worked at the Environmental Claims Unit of the UN Compensation Commission in Geneva, and served as Director of the Environmental Democracy Practice at the World Resources Institute (WRI) in Washington DC. As a member of the Compliance Review Panel of the Asian Development Bank (ADB), he led the review of multiple compliance cases. Lalanath has a PhD from the University of Sydney, a Master of Laws from the University of Washington, and graduated from the Sri Lanka Law College as an Attorney-at-Law.



**PACO GIMENEZ-SALINAS**  
COMPLIANCE AND DISPUTE RESOLUTION SPECIALIST

Paco Gimenez-Salinas, born in Spain, is a lawyer by profession specialized in alternative dispute resolution with a focus in mediation. He has participated in cases handled by the Compliance Advisor Ombudsman (IFC) as an external facilitator, as well as in cases managed by the Independent Consultation and Investigation Mechanism (IADB) in the role of its consultation phase coordinator. In México, he spent several years working in the field of community mediation. Amongst other experiences, he has participated in the design and facilitation of several major multi-party dialogues around issues such as air pollution reduction strategies, the impacts of dams and windmill fields, the strengthening of conflict resolution systems of land tenure related conflicts, etc. Paco has undertaken post-graduate studies in the fields of conflict resolution at the University of Barcelona, political analysis at the Mexican University CIDE and community-company mediation at the University of Cape Town.



**CHRISTINE REDDELL**  
REGISTRAR AND CASE OFFICER

Christine Reddell is the Registrar and Case Officer of the IRM. Christine is from Cape Town, South Africa, where she practiced as an attorney before joining the IRM. Christine spent time in both private practice, and as an attorney for the Centre for Environmental Rights (CER), South Africa's largest public interest, environmental law firm. While at the CER, she also participated as a core team member of the Commonwealth Climate and Law Initiative, a research, education and outreach project set up by the University of Oxford's Smith School of Enterprise and the Environment, the Prince's Accounting for Sustainability Project, and ClientEarth. In 2018, Christine was one of the recipients of the Mail and Guardian's 200 Young South Africans award, which recognises exceptional South Africans under the age of 35. Christine holds a Bachelor of Arts degree (History and Sociology), Bachelor of Laws degree, and a Master of Laws degree (Marine and Environmental Law) from the University of Cape Town.



**PAUL SAFAR**  
COMMUNICATIONS AND EVENTS ASSISTANT CONSULTANT

Paul is a communications consultant, who supported the IRM with its outreach and capacity building programme as well as other communications activities in 2020. He received his bachelor's degree in Communication Science and Journalism at the University of Vienna and worked for three years in the health promotion sector for the town council of Vienna. In his master's studies, he specialized in International Migration and Ethnic Relations at Aalborg University in Denmark where he focused on the nexus between climate change and migration patterns. During his studies, he spent time abroad in Indonesia working for an NGO and in Fiji conducting ethnographic research for his final thesis about environmental migration in the Pacific. He also worked for UN-Habitat, the United Nations Human Settlements Programme, in Fiji where he was involved in informal settlements upgrading in particular in relation to environmental and climate change impacts. He also completed a six-month internship with the IRM of the GCF before starting his contract as a communications and events assistant consultant. He currently supports the communications initiatives of the Air Quality and Health Unit of the World Health Organization (WHO) in Geneva.



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