

# Enduring Earth: Accelerating Sustainable Finance Solutions to Achieve Durable Conservation Project (GEF ID: 11014)

## Global Grievance Redress Mechanism

### Overview of GRM

#### 1. Background

The Enduring Earth Accelerating Sustainable Finance Solutions to Achieve Durable Conservation Project (EE Project), funded by the Global Environment Facility (GEF), aims to support governments and communities to conserve the resources that sustain life by accelerating inclusive area-based conservation measures in furtherance of the Global Biodiversity Framework's Target 3 (the "30 by 30" target) through the Project Finance for Permanence approach.

In compliance with The Nature Conservancy's "[Respecting Human Rights](#)" Policy, WWF and GEF's Policy on Environmental and Social Safeguards, the EE Project has established multiple channels—both formal and informal—for stakeholders to identify potential threats, raise concerns, or express grievances. Informal channels primarily involve ongoing face-to-face community and stakeholder meetings conducted as part of project implementation, facilitating direct feedback and the immediate raising of concerns and grievances. In cases where stakeholders are not satisfied with the response of project staff, or have other concerns about speaking with project staff, they may choose to use the formal mechanisms available to the public.

### Principles of all EE Project GRMs

For all four channels, affected communities and stakeholders are assured that their grievances will be addressed in a timely manner, that they will not face retaliation for submitting a grievance, and that the grievances will be handled confidentially. Overall, the GRM will uphold the following seven principles in line with the [EE Project's Environmental and Social Management Framework](#).

1. **Fairness:** Grievances are assessed impartially and handled transparently.
2. **Objectiveness and independence:** The GRM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment to each case.
3. **Simplicity and accessibility:** Procedures to file grievances and seek action are simple enough that project beneficiaries can easily understand them and in a language that is accessible to everyone within a given community, especially those who are most vulnerable.
4. **Responsiveness and speed:** The GRM is designed to be responsive to the needs of all complainants. Accordingly, officials handling grievances must be trained to take effective action upon, and respond quickly to, grievances and suggestions. All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is swift, decisive, and constructive.
5. **Participation and inclusiveness:** A wide range of affected people—communities and vulnerable groups—are encouraged to bring grievances and comments to the attention of the project implementers. Special attention is given to ensure that contextually marginalized groups, including those with special needs, are able to access the GRM.
6. **Accountability and closing the feedback loop:** All grievances are recorded and monitored, and no grievance remains unresolved. Complainants are always notified and get explanations regarding the results of their complaint. An appeal option shall always be available.

7. **Non-retaliation:** All people who register complaints will be protected from retaliation<sup>1</sup> including by maintaining confidentiality of complainants unless they have agreed otherwise.

The GRM is designed to be accessible, efficient, safe, and equitable, particularly for women and other contextually marginalised groups (e.g., indigenous peoples, local communities, youth). It takes into account the systemic barriers they are more likely to face, such as language, literacy levels, access to information and digital technology, mobility, and unpaid care responsibilities. Key elements include:

- Ensuring grievance mechanism staff develop gender sensitivity and prevent unconscious bias through continuous training. Staff should also be knowledgeable about The Nature Conservancy’s Respecting Human Rights Policy, WWF Gender Policy and GEF Policy on Gender Equality.
- Promoting awareness of accessible grievance mechanisms, with a particular focus on reaching marginalised groups by using diverse, inclusive channels such as in-person meetings, materials translated into local languages, and social media.
- Establishing multiple communication channels to maximise access and relevance (e.g., in-person, toll-free hotline, e-mail, postal address).
- Providing independent, culturally appropriate, gender-sensitive investigations of violations and committing to addressing power imbalances during dispute resolution processes. This includes giving the complainant the option to select a mediator of a particular gender to ensure comfort, especially in instances of sexual exploitation, abuse, and harassment (SEAH).
- Monitoring the grievance mechanism to ensure access and remediation outcomes for all stakeholders, incorporating lessons learned to improve its effectiveness, inclusivity, and gender responsiveness.

## Submitting complaints

### 1. Filing a complaint

Project-affected people, project implementers, or interested stakeholders can submit grievances, complaints, questions, or suggestions to The Nature Conservancy’s (TNC) Global Ethics and Compliance Team through a variety of communication channels:

Channel	Details
By email	<a href="mailto:compliance@tnc.org">compliance@tnc.org</a>
By phone (TNC Helpline)	Call (+1) 833-426-1404 Text (+1) 571-458-1739  Anyone can submit a question or concern 24/7/365 in over 55 languages
By Website	<a href="#">The Nature Conservancy Ethics &amp; Compliance Helpline</a>
By Mail	Chief Ethics & Compliance Officer Office of Ethics and Compliance, GEF Grievance The Nature Conservancy 4245 North Fairfax Drive, Suite 100

<sup>1</sup> TNC will not tolerate retaliation against individuals who ask questions or raise concerns about potential misconduct in good faith (TNC Code of Conduct).

To submit a grievance, the aggrieved party should provide the following information at a minimum:

- **Contact Information:** Names, designations, addresses, and contact information of the aggrieved party and/or their representative. If the complainant wishes to remain anonymous, they may submit their complaint through a representative and withhold their name. If there is no one they trust with their identity, they may submit their complaint through the website.
- **Representative Information:** If the complaint is made through a representative, the name(s) of the person(s) on whose behalf the complaint is made.
- **Complaint Description:** A brief description of the impacts, including the location(s) and timing of occurrence.

The aggrieved party may also submit additional information, including:

- **How the Project Caused the Impact:** An explanation of how the project caused or may cause the reported impact.
- **Previous Actions Taken:** Details of any actions or measures that have been undertaken by the complainant to resolve the issue.
- **Proposed Solutions:** Suggestions for potential solutions or remedies to address the grievance.
- **Specific Assistance Requested:** The type of assistance or resolution being sought from the GRM.

Initially, the complainant needs only to provide sufficient information to determine the eligibility of the grievance. If submissions contain incorrect or incomplete information, the complainant or their representative will be contacted for further clarification.

Types of complaints that can be raised include, but are not be limited to, the following issues:

- Allegations of fraud, malpractices or corruption by staff or other stakeholders as part of any project or activity financed or implemented by the project.
- Allegations of gender-based violence or sexual exploitation, abuse, or harassment (SEAH) by staff or other stakeholders as part of any project or activity financed or implemented by the project.
- Environmental and/or social damages/harms caused by projects financed or implemented (including those in progress) by the project. This could include complaints related to pollution prevention and resource efficiency; negative impacts on public health, environment or culture; destruction of natural habitats, destruction of physical and cultural heritage; or any other issues which adversely impact communities or individuals in project areas.
- Complaints and grievances by permanent or temporary workers engaged in project activities.

## Process of Addressing Complaints

### 1. Notification of the Global PMU

- The Ethics and Compliance Office will notify the GEF7 EE Project global Project Management Unit (PMU) upon receiving a complaint. If relevant, the TNC Chief Diversity, Equity & Inclusion Officer, the appropriate TNC legal counsel, and any other senior leaders pertinent to the grievance will be informed, to the extent possible without breaching confidentiality.

## 2. Eligibility screening

- The global PMU will undergo an initial screening to determine their relevance based on the following criteria:
  1. **Good faith:** Has the affected party made good faiths efforts to address the problem with TNC?
  2. **Relevance:** Does the grievance relate to the Enduring Earth GEF-7 Project?
  3. **Timeliness:** Is the complaint received no later than 30 days since the official closure of the project?<sup>2</sup>
  4. **Repetitiveness:** Does the grievance relate to an issue that is already being handled? Repetitive complaints on the same subject and by the same complainant, which have already been addressed, will not be considered unless new facts or circumstances are presented.
  5. **Suitability of External Organisations:** Are there other organizations or government bodies that would be more appropriate to address this concern?<sup>3</sup>
  
- Within three working days of notification, the global PMU will:
  - Acknowledge receipt of grievance.
  - For eligible complaints, provide the complainant with an overview of the grievance resolution process, including details on how their information will be recorded, stored, and reported.
  - For complaints outside the scope of the project's GRM, the complainant will be informed of the reasons for ineligibility and on alternative channels.
  - Share the contact details of the officer handling the grievance.
  - Verify the contact information of the complainant and ensure all necessary information to process the complaint is provided.
  - Document all complaints, regardless of eligibility, in the grievance log, assign a registration number, and enter them into a secure, password-protected electronic grievance log. Information in the grievance log will be retained throughout the project implementation period and for two years following the project's end date. After this period, the files will be deleted.

## 3. Investigation of Complaints

- The Global PMU will oversee the investigation process, identifying the appropriate entities to review and resolve the issue. All complaints submitted to the GRM will be treated as confidential. To ensure a high level of confidentiality, grievances submitted in written or electronic form will initially be reviewed only by the officer in charge. For complaints submitted verbally, only the staff member who receives the complaint and the officer in charge will be privy to the details.
- The investigation process will involve consulting, when appropriate, the affected party for information, assigning personnel to gather relevant information, conducting field visits if necessary, and communicating with all relevant stakeholders throughout the

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<sup>2</sup> Official project closure date : December 31st 2029. Grievance Mechanisms at the country level will be available post-project closure.

<sup>3</sup> The GRM seeks to complement, rather than substitute, the judicial system and other dispute resolution mechanisms. The complainant may, therefore, be advised to seek alternative redress mechanisms under national or international law, or the rules and regulations of other institutions, agencies or commissions related to the complaint including anti-corruption bodies and courts of law.

investigation. The Global PMU will ensure that investigators remain neutral and have no vested interest in the outcome of the investigation.

- For grievances requiring further action beyond the scope of the Global PMU, the case will be discussed solely by its registration number, with no personal details such as the complainant’s name or location being disclosed unless essential for the resolution.

#### 4. Response to Complainants

- The global PMU is responsible for providing periodic updates on the status of the grievance to the complainant. A written response will be issued within 30 working days of receipt of the grievance. If further investigation is deemed necessary, the complainant will be informed, and a final response will be provided within an additional 15 working days. If the complainant is satisfied with the resolution, the global PMU will document the satisfactory resolution in consultation with the complainant and formally close out the grievance.

#### 5. Appeal

If the affected party is unsatisfied with the response provided by TNC, the grievance may be submitted to the WWF GEF Agency or to the GEF Secretariat using the following channels or further adjudicated through a Court of Law.

Agency/Person in Charge	Email	Mailing Address
<b>WWF GEF-Agency</b>	<i>SafeguardsComplaint@wwfus.org</i>	Project Complaints Officer Safeguards Complaints, World Wildlife Fund 1250 24th Street NW Washington, DC 20037
<b>GEF Secretariat</b>	<i><a href="mailto:plallas@thegef.org">plallas@thegef.org</a></i>	GEF Resolution Commissioner Global Environment Facility The World Bank Group, MSN N8-800
<b>Pew Charitable Trusts</b>	<i><a href="mailto:ETPgrievance@pewtrusts.org">ETPgrievance@pewtrusts.org</a></i>	The Pew Charitable Trusts Program Coordination and Services (ETP) 901 E Street NW, Washington, DC 20004-2008 USA

Stakeholders may also submit a complaint online through an independent third-party platform at [WWF Ethics Point](#). Complaints submitted to the GEF Resolution Commissioner must be in writing and may be provided in any language. Each complaint should include a general description of the nature of the concerns, the potential harm that may result, and, where relevant, details of the GEF-funded projects or programmes involved.

#### Use of Data for Project Reports

All complaints will be documented in the project’s annual report, including a summary of the complaint, resolution, and relevant dates. Project reports will be accessed by the GEF Secretariat, WWF GEF Agency, Enduring Earth

partners, Global PMU, relevant TNC supporting units, and project executing agencies, including the country Project Steering Committees. Confidentiality will be maintained, ensuring that neither the complainant's name nor specific complaint details are disclosed, making it untraceable. Sensitive cases will be reported as a separate encrypted report, shared only with the WWF GEF Agency Safeguards Specialist and the GEF Resolution Commissioner for accountability purposes.