

Conservation International (CI)

CI-GEF Accountability and Grievance Mechanisms

This profile was prepared using publicly available sources and reviewed by the Agency for accuracy prior to publication.

Conservation International (CI) is a nonprofit organization founded in 1987 that works globally to protect nature and promote sustainable development. Based in the USA, CI operates in over 70 countries, partnering with governments, communities, and the private sector to conserve ecosystems, address climate change, and support sustainable resource use. As a GEF Implementing Agency, CI has established a CI-GEF Accountability and Grievance Mechanisms (AGM) to ensure that if people or communities are harmed or have concerns due to breaches in environmental and social safeguards, they have recourse to redress.^{1 2}

STANDARDS AND SAFEGUARDS

The **Environmental and Social Management Framework (ESMF)** is guided by CI's Rights-Based Approach and includes four core policies: Environmental and Social Safeguards, Gender Mainstreaming, Stakeholder Engagement, and Accountability and Grievance Mechanisms. The ESMF's Environmental and Social Safeguards Policy sets out 10 standards covering key areas such as impact assessment, natural habitats, resettlement, indigenous peoples, resource efficiency, cultural heritage, labor conditions, community health and safety, private sector investment, and climate risks.³

LAND TENURE

Land tenure rights and grievances related to land (such as ownership, access, usage, eviction, or displacement) are explicitly covered in the CI-GEF AGM as set out in its ESMF. Specifically, under the ESMF's **Involuntary Resettlement Policy**, the mechanism addresses grievances related to both legal and customary land rights, recognizing claims under national law and including people without formal legal title. It covers cases of physical displacement, economic displacement, and restrictions on access to natural resources. Among other requirements, projects must adhere to the principle of Free, Prior, and Informed Consent (FPIC), develop Voluntary Resettlement Action Plans (RAPs), and participatory process frameworks that include clear provisions for recognizing land tenure, providing fair compensation for losses, ensuring livelihood restoration, and offering access to land-based or cash compensation.

OUTREACH AND ADMISSIBILITY

Information about the CI-GEF AGM is primarily communicated at the project level, with Executing Agencies responsible for informing project-affected parties about the mechanism and the safeguards established to minimize the risk of retaliation. CI maintains a dedicated webpage that provides basic

¹ CI. n.d. About Conservation International. <https://www.conservation.org/about>

² CI. n.d. Accountability and Grievance Mechanism. <https://www.conservation.org/gef/grievance-mechanism>

³ CI. 2020. Environmental and social management framework (ESMF). https://www.conservation.org/docs/default-source/gcf/ci_gef_gcf-esmf-version-7.pdf?sfvrsn=a788de43_4

information, contact details, and access to an online grievance reporting tool (EthicsPoint) which provides a secure and accessible channel for submitting complaints.⁴ The CI-GEF AGM allows groups of two or more people affected by CI-implemented GEF projects to file complaints if they believe the project has caused or will cause direct harm due to noncompliance with the ESMF.

To be deemed eligible under the CI-GEF AGM, a complaint must: (i) concern a project or program implemented or executed by CI; (ii) be submitted by, or on behalf of, individuals or groups directly affected by the project; (iii) demonstrate that the complainant has engaged with the Executing Entity and made good faith efforts to resolve the issue through the established conflict resolution framework; and (iv) allege potential noncompliance with the CI's ESMF. Anonymous complaints are not accepted, however, the complainant's identity will be kept confidential upon request.

Complaints shall be excluded if: (i) they are unrelated to CI's role, (ii) submitted more than two years after project closure, or (iii) pertain to procurement, fraud, corruption (which are dealt with through CI's Ethics Line rather than the GEF grievance mechanism), internal personnel matters, or the adequacy or suitability of CI's policies. Additionally, the AGM excludes complaints that:

- fall under the sole responsibility of other parties, such as national governments or executing entities, unless their conduct is directly relevant to assessing CI-GEF compliance;
- do not allege CI's noncompliance with its operational policies or procedures;
- solely concern national laws, policies, or regulations, unless directly linked to CI's compliance obligations; or
- which repeat matters already reviewed by the compliance team, unless supported by new evidence warranting reconsideration or consolidation.

FILING A COMPLAINT

Complainants are required to provide specific information, including the names and contact details of all complainants (and any representatives), proof of authority when submitting on behalf of others, confidentiality preferences, a description of the relevant project, details of the alleged harm and policy breaches, and documentation of efforts made to resolve the issue at the local level.⁵ Complaints may be submitted in writing directly to the CI Director of Compliance via email or mail, or alternatively through CI's Ethics Line, an online reporting system available in multiple languages.^{6 7}

DESCRIPTION OF THE PROCESS

The CI-GEF AGM follows a structured, three-level process for handling complaints related to CI-implemented GEF projects.⁸ Complaints must first be raised with the **Executing Entity**, which is responsible for addressing concerns locally and providing a written response within 30 days. If unresolved, complaints can be escalated to CI through the Ethics Line or directly to the **Director of Compliance**, who oversees eligibility review and impartial investigation. If the complainant remains

⁴ CI. n.d. Accountability and Grievance Mechanism. <https://www.conservation.org/gef/grievance-mechanism>

⁵ Paragraphs 10; 33 and 34-36. Accountability and Grievance Mechanism. CI. 2015. Accountability and Grievance Mechanism. https://www.conservation.org/docs/default-source/gef-documents/20151115-accountability-and-grievance-mechanism.pdf?sfvrsn=92633125_2

⁶ CI. n.d. EthicsPoint Hotline <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>

⁷ CI. n.d. Accountability and Grievance Mechanism. <https://www.conservation.org/gef/grievance-mechanism>

⁸ Paragraphs 5; 6 and 17 Accountability and Grievance Mechanism. CI. 2015. Accountability and Grievance Mechanism. https://www.conservation.org/docs/default-source/gef-documents/20151115-accountability-and-grievance-mechanism.pdf?sfvrsn=92633125_2

unsatisfied, the issue can be further escalated to the **GEF Conflict Resolution Commissioner** for independent review and final resolution. The CI-GEF AGM provides two key pathways to address complaints. The **problem solving process** facilitates dialogue between project-affected stakeholders and other relevant parties to jointly address grievances or disputes related to the social and environmental impacts of CI-supported activities. The **compliance review process** investigates allegations of noncompliance with CI's ESMF.

When a complaint is accepted, the Ethics & Risk team either manages it directly or assigns a qualified person or panel to carry out a thorough and impartial review. The review process may include in-country site visits, interviews with project-affected people, and gathering comprehensive information to understand the facts and establish a reliable basis for any recommendations. The designated reviewer or panel reports its findings to the Vice President, Operations, Ethics and Risk, who then works with the involved parties to help resolve the problem. Resolution efforts can include consultative dialogues, joint fact-finding, information sharing, or the establishment of a mediation mechanism. If addressing the complaint requires altering the project, the Project Agency must formally approve such changes and inform the GEF Secretariat.

Once either process is complete, whether or not an agreement is reached, the Ethics & Risk team or panel prepares a report summarizing the complaint, the steps taken, the outcomes, and any agreements made, which is then shared with all parties. While there is no fixed time limit for the overall problem solving process, the Executing Entity must respond in writing within 30 days of receiving a grievance. The duration of either process, which may include dialogue, mediation, or fact-finding, varies depending on case complexity and stakeholder engagement. While the mechanism does not provide direct financial or legal assistance to complainants, it mandates that grievance procedures be designed to remain non-cost-prohibitive.⁹ If applicable, the Ethics & Risk team monitors with the CI-GEF team the implementation of the remedial measures within clearly defined timelines.¹⁰ The process formally concludes after monitoring is completed, and a final report is prepared and shared with all parties.¹¹ If the complainant remains unsatisfied with CI's handling of the grievance, they have the right to escalate the matter to the GEF Conflict Resolution Commissioner for independent review.¹² The CI-GEF AGM maintains a **public complaints registry** of high risk grievances.¹³

⁹ Paragraph 249. ESMF. CI. 2020. Environmental and social management framework (ESMF). https://www.conservation.org/docs/default-source/gcf/ci_gef_gcf-esmf-version-7.pdf?sfvrsn=a788de43_4

¹⁰ Paragraphs 18-32. Accountability and Grievance Mechanism. CI. 2015. Accountability and Grievance Mechanism. https://www.conservation.org/docs/default-source/gef-documents/20151115-accountability-and-grievance-mechanism.pdf?sfvrsn=92633125_2

¹¹ Paragraphs 11-17. Accountability and Grievance Mechanism. CI. 2015. Accountability and Grievance Mechanism. https://www.conservation.org/docs/default-source/gef-documents/20151115-accountability-and-grievance-mechanism.pdf?sfvrsn=92633125_2

¹² Paragraph 17. Accountability and Grievance Mechanism. CI. 2015. Accountability and Grievance Mechanism. https://www.conservation.org/docs/default-source/gef-documents/20151115-accountability-and-grievance-mechanism.pdf?sfvrsn=92633125_2

¹³ CI. n.d. Grievance Register <https://www.conservation.org/about/our-commitment-to-ethics/grievance-register>