

To:

The Social and Environmental Compliance Unit and Stakeholder Response Mechanism
United Nations Development Programme (UNDP)

RE: FORMAL COMPLAINT — VIOLATIONS OF UNDP SES STANDARDS IN

Background

We write to you as Representatives of communities in [REDACTED] a community of over 250 families. We have been offering legal counsel to the communities for several months and have engaged different judicial and non-judicial avenues to seek remedy on behalf of the community. Enclosed herewith is the written authority from the affected community authorizing us to act on their behalf, along with copies of prior correspondence exchanged with UNDP, NEMA, the Green Climate Fund (GCF), and other relevant entities.

Our Complaint relates to the "Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda" project (The Project), supported by UNDP and funded by the Green Climate Fund. As we understand it, The Project was expected to impact 24 districts in Eastern and Southwestern Uganda. Unfortunately, this is not the case. UNDP supported the Government of Uganda through this Project to issue a nationwide wetland gazettement on 23 December 2023, far beyond the approved project scope. This gazettement included gazettement of areas such as [REDACTED] as wetlands, which are not part of the 24 targeted Districts. The gazettement was done without proper Environmental and Social Impact Assessments (ESIAs) and community engagement.

Acting on this gazettement, the National Environment Management Authority (NEMA) carried out forced evictions in [REDACTED] 2025 without notice to affected communities, and without providing compensation. NEMA has also threatened eviction in [REDACTED]. To us, the gazettement of the community's land as wetland enabled through UNDP's support in this Project, is unjust and in violation of UNDP's Social and Environmental Standards, particularly Standards 1, 2, 3 and 5 concerning community safety, displacement, and fair resettlement procedures.

Actions Taken by Complainants

We have now filed an appeal with NEMA's Appeal's Committee which verbally issued a stay, though threats continue—and simultaneously lodged High Court applications in Uganda [REDACTED] among others. We also submitted Reference [REDACTED] to the East African Court of Justice. We have had communications with UNDP and GCF, and it is the basis of which, we have decided to file a formal complaint, so that the issue is addressed.

Violations

In the case of [REDACTED] the Government of Uganda, with support from UNDP, gazetted the lands as wetlands on **23rd December 2023**. Consequently forced evictions on [REDACTED] **2025 and the said gazettement**, there was: No Environmental and Social Impact Assessment (ESIA) conducted; No compensation or livelihood restoration plans developed; No community consultation or stakeholder engagement undertaken.

This lack of adherence to **SES Standard 5** directly contributed to the community's dispossession and suffering. **UNDP SES Standard 5** prohibits forced evictions, permitting them only in exceptional circumstances. Such evictions must be: Authorized by national law; carried out in full accordance with relevant provisions of international human rights and humanitarian law; Undertaken solely for the purpose of promoting general welfare; reasonable and proportional.

Violation of SES Standard 3: Safety & Security Risk Omission; UNDP SES Standard 3 requires: Assessments of health, safety, and security risks; Adoption of preventive plans for vulnerable groups; Emergency preparedness and response strategies.

In [REDACTED] the forced evictions were executed without: Any safety management or risk mitigation measures; Consideration of the impacts on marginalized groups; Emergency preparedness plans.

The use of armed forces during the evictions further exacerbated the safety risks, violating SES Standard 3 and endangering the community members.

In the case of [REDACTED] the Government of Uganda, with technical and financial support from the United Nations Development Programme (UNDP), gazetted the community lands as wetlands on 23rd December 2023. This action was taken under the "Building Resilient Communities, Wetland Ecosystems and Associated Catchments in Uganda" project, whose geographical scope, according to the official project documents submitted to the Green Climate Fund (GCF), was limited to 24 districts in Eastern and Southwestern Uganda. The inclusion of [REDACTED] constituted a significant and unjustified geographic overreach, carried out without public notice or revision of project scope, thereby breaching UNDP SES Standards, which mandates that project activities be clearly defined and disclosed.

In addition to this overreach, the gazettment and subsequent forced evictions were carried out without conducting an Environmental and Social Impact Assessment (ESIA), without preparing Resettlement Action Plans (RAPs), without stakeholder consultations, and without providing compensation or livelihood restoration, all of which are expressly required under UNDP SES Standard 5 (Displacement and Resettlement), para. 8 and 10. These provisions emphasize that where displacement is likely, an ESIA must be conducted to evaluate environmental and social impacts and ensure appropriate planning and protection of affected people. Moreover, paragraph 15 of the same standard reiterates that forced evictions may only be undertaken "in exceptional circumstances," and even then, must be authorized by national law; carried out in full accordance with international human rights and humanitarian law; reasonable and proportionate; follow due process; and include measures for full and fair compensation and rehabilitation.

None of these conditions were met in [REDACTED]. The community was neither informed nor consulted prior to the eviction. The evictions occurred on [REDACTED] 2025 with the involvement of armed units from the Uganda Police Force and the Special Forces Command, acting on directives issued by the Minister of Water and Environment. These actions resulted in the demolition of homes, destruction of livelihoods, and psychological trauma, especially among women, children, older persons, and other vulnerable groups.

Additionally, these evictions violated **UNDP SES Standard 3** (Community Health, Safety and Working Conditions). Specifically, SES standards require that UNDP-supported projects must: Assess risks to the health, safety and security of affected communities during all phases of the project and establish preventive and responsive plans to mitigate them, particularly for disadvantaged or vulnerable groups.

In this case, there were no health or safety assessments, no emergency preparedness measures, and no targeted risk mitigation strategies in place. The use of militarized enforcement significantly endangered community members, further compounding harm in violation of SES 3 and undermining the project's obligation to operate under "**good international industry practice**" and uphold the "**do no harm**" principle.

This combined failure to adhere to **UNDP SES Standards 3, 5 and other standards** and the resulting harm from illegal gazettment, lack of safeguards, and unauthorized expansion of project scope, constitutes a serious breach of both UNDP policy and the rights of the affected communities. Immediate independent investigation, remedy, and accountability are warranted under the mandate of the UNDP's Accountability Mechanism, both the SRM and the SECU

Requested Accountability Mechanism Actions

We request the following outcomes from this process:

- a) A SECU-led investigation to ensure that alleged violations of UNDP's social and environmental standards are fully examined;

- b) Property and livelihood restoration, including full compensation and transitional support for harms suffered;
- c) Clear institutional accountability, including clarification of responsibility and corrective measures on the part of UNDP, NEMA, GCF and any implementing entities, and
- d) robust protections for complainants, including confidentiality safeguards, legal assistance, and protection from retaliation.

Complaint prepared by:

1. [REDACTED]

[REDACTED]