



Grievance Redress Mechanism

Eastern Tropical Pacific Durable Finance Mechanism

The Pew Charitable Trusts (Pew) is supporting partners in the marine corridor of the Eastern Tropical Pacific (CMAR) to advance conservation and ensure long-term sustainability through the development of a Durable Finance Mechanism (DFM). Pew is advancing this work in partnership with Enduring Earth, a collaboration between Pew, The Nature Conservancy (TNC), World Wildlife Fund (WWF) and ZOMALAB that seeks to protect our planet's ocean, lands, and freshwater, and secure long-term financing for conservation and community prosperity. This is built on a commitment to uphold the rights of people and create opportunities for sustainable growth.

Eastern Tropical Pacific Durable Finance Mechanism

The Eastern Tropical Pacific (ETP) region is one of the world's most biodiverse and ecologically significant marine regions. Established in 2004 by Ecuador, Costa Rica, Colombia, and Panama, CMAR is a voluntary regional initiative that strengthens connectivity, conservation, and sustainable management across this vast marine area.

Pew is supporting the development of the ETP DFM through The Enduring Earth Accelerating Sustainable Finance Solutions to Achieve Durable Conservation Project (EE Project), funded by the Global Environment Facility (GEF).

- The initiative will support strengthened cross boundary conservation coordination in the ETP and make a substantial contribution to meeting Governments' commitments to protect and conserve more ocean areas.
- Objectives include protecting the migratory routes, preserving biodiversity, supporting coastal communities, and contributing to healthy and equitable economies.
- Activities and outcomes achieved under the DFM are intended to be supported and sustained over the long term.

Grievance Redress Mechanisms

Grievance Redress Mechanisms (GRM) are designed to enable the receipt of complaints of project affected people and public concerns regarding the environmental and social performance of a project. The aim of a GRM is to provide people fearing or suffering adverse impacts with the opportunity to be heard and assisted without fear of retaliation. It is designed to provide a pathway to address the concerns of stakeholders of a particular project, identify the root causes of the conflicts, and find options for the resolution of grievances.

Grievance Redress Mechanisms for the EE GEF-7 project and ETP DFM

Pew's GRM for the ETP DFM receives and addresses project-related grievances directed towards Pew, its associated staff (including consultants and grantees) and project impacts during the DFM planning phase. Pew's GRM follows the best practice principles from the International Union for the Conservation of Nature's (IUCN) Environmental and Social Management System Manual. Pew's GRM is one of multiple channels available within the EE project for complainants to identify

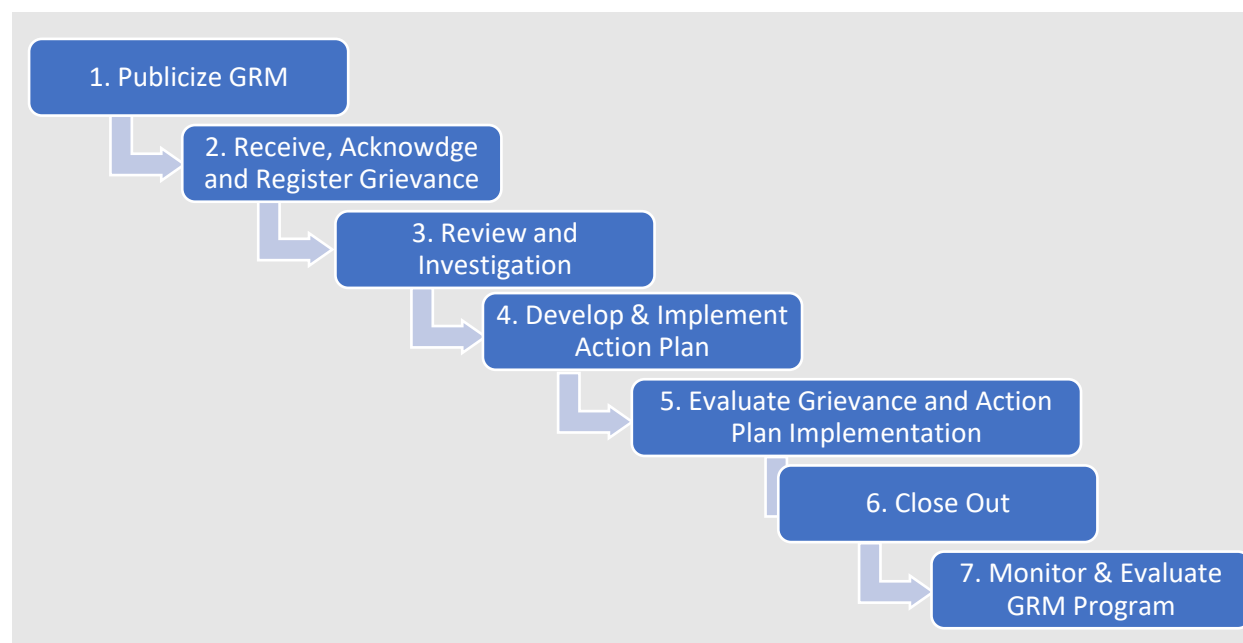
potential threats, raise concerns, or express grievances. The following table outlines all grievance mechanisms available.

| Agency | Email | Mailing Address |
|-------------------------------|--|---|
| PEW Charitable Trust | ETPgrievance@pewtrusts.org | The Pew Charitable Trusts ATTN: Program Coordination and Services (ETP) 901 E Street NW, Washington, DC 20004-2008 USA |
| WWF GEF-Agency | SafeguardsComplaint@wwfus.org | Project Complaints Officer Safeguards Complaints, World Wildlife Fund 1250 24th Street NW Washington, DC 20037 |
| GEF Secretariat | plallas@thegef.org | GEF Resolution Commissioner Global Environment Facility The World Bank Group, MSN N8-800 |
| The Nature Conservancy | compliance@tnc.org | Chief Ethics & Compliance Officer Office of Ethics and Compliance, GEF Grievance The Nature Conservancy 4245 North Fairfax Drive, Suite 100 Arlington, VA 22203-1606, USA |

Pew's GRM will be used for the duration of the planning phase. When the DFM is in implementation, the implementing entity, still to be identified, will be responsible for developing and managing an ESS framework including a GRM.

Pew's Grievance Redress process

Based on best practices, the following steps are used by Pew.



1. Publicize GRM

Pew will make information about the GRM publicly available, including the definition of a grievance, the purpose of the GRM, who can submit a grievance, how to submit a grievance, and the process after submission.

Pew's staff will promote the GRMs available to the ETP project via the following mechanisms, all of which will include information regarding the GRM and the grievance submission form:

- Pew website.
- Relevant Pew-created ETP DFM Project documents.

Project-specific disclosure of the GRM to key stakeholders will be done in a manner, language, and format that suits local context. This may include posting flyers, sharing information during meetings, or providing information to stakeholders. Additionally, local partners will be made aware of the GRM so that they can direct people to the GRM as needed. Partners are not expected to promote the GRM on Pew's behalf.

Grievances can be submitted via:

- A publicly available form that is accessible on Pew's website, where complainants may directly fill in and submit a grievance using the form.
- A publicly available email address with clear instructions on how to submit a grievance.
- At Pew's office, 901 E Street Northwest, Washington, D.C., 20004. United States

2. Receive, Acknowledge, and Register Grievance – within two (2) weeks of receipt of grievance

Once a grievance is submitted, it will be received and acknowledged by Pew's Program and Coordination Services (PCS). The acknowledgement will be in an email format and will confirm receipt and outline next steps and timelines. All grievances will be registered in Pew's internal grievance database, which is maintained by PCS, respecting confidentiality and data privacy throughout the process. While information regarding any grievances received will be maintained with PCS for internal purposes only and to ensure resolution of any grievance, confidentiality and data privacy will be maintained in all cases.

For grievances related to the ETP DFM, which is implemented as part of the Enduring Earth GEF Project, any raised grievances and updates on their progress will be shared with the EE Project Global Project Management Unit (Global PMU) at TNC and the WWF-GEF Agency for accountability purposes. Progress will be documented in a password-protected grievance log, accessible only to key safeguards staff from TNC and the WWF-GEF Agency.

3. Review and Investigation – timeline dependent on nature of grievance, aim to complete within three (3) weeks after registering grievance

Once a grievance has been received, acknowledged and registered, it will be evaluated by PCS to determine the action required. The evaluation will consider the specific nature of the allegation, context, relevant parties, and possible actions needed. The evaluation will also determine if the grievance is eligible for processing using the following criteria (if available):

- Is the grievance made in good faith?
- Does the grievance directly relate to the project?
- Are there other organizations that are more appropriate to address the issue/responsible for handling the particular complaint?
- Is the grievance submitted by or on behalf of a person or people affected by the project or program?

Grievances found to be ineligible will be closed out by PCS and the complainant and the Global PMU will be notified. If there is an organization that is more appropriate to address the issue, PCS will direct the complainant towards the proper organization/GRM.

PCS will manage the GRM database but will not be responsible for managing the grievances. Should the grievance be determined to require further action, PCS will use Pew's GRM Responsibility Table to determine to whom the grievance should be routed within Pew (Managing Parties). The review and recommended actions will be filed and stored by PCS in the grievance database.

4. Develop and Implement Action Plan – within two (2) months of registering grievance

Following Step 3, the Managing Parties that have been identified by PCS will develop an action plan and work with the complainant to resolve the grievance. Further assessment and information gathering may be needed to determine the most appropriate action. This may include, among others:

- Engagement/negotiation with the complainant;
- Engagement with other stakeholders; or
- Field visits and fact-finding missions.

Grievance responses should consider the complainant's views about the desired outcomes or process for grievance resolution. The response may suggest a specific remedy or an approach for how to resolve the grievance.

Managing Parties will develop a proposed response to the aggrieved party that includes:

- A clear explanation of the response and why it is being proposed; and
- What the complainant's choices are, given the proposed response. For example:
 - Agreement to proceed.
 - Further dialogue on proposed action.
 - Participation in proposed assessment and engagement process.

When possible, consultation and discussion should be the first step of reconciliation, followed by mediation if necessary. All DFMs will need to budget for mediation should this be necessary. Clear timelines are included in the action plan.

Appeal

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

| Agency/Person in Charge | Email | Mailing Address |
|-------------------------------|--|---|
| WWF GEF-Agency | SafeguardsComplaint@wwfus.org | Project Complaints Officer Safeguards Complaints, World Wildlife Fund 1250 24th Street NW, Washington, DC 20037, USA |
| GEF Secretariat | plallas@thegef.org | GEF Resolution Commissioner Global Environment Facility The World Bank Group, MSN N8-800 |
| The Nature Conservancy | compliance@tnc.org | Chief Ethics & Compliance Officer Office of Ethics and Compliance, GEF Grievance The Nature Conservancy 4245 North Fairfax Drive, Suite 100 Arlington, VA 22203-1606, 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 programs involved.

5. Evaluate – during duration of project, as needed

PCS will review the action plan as per the timeline outlined in the plan to determine if the matter has been adequately addressed and if it can be closed out. On-going Monitoring and Evaluation (M&E) (see below) occurs annually of the overall program. This step pertains to the particular grievance. This step includes an evaluation of the action plan, reconciliation process, determination of whether the grievance has been resolved and if so, a close out (Step 6).

6. Close Out

Following evaluation of the action plan, if the grievance has been resolved, it will be closed out. All documentation will be stored by PCS.

7. Monitoring and Evaluation

Monitoring and Evaluation of the GRM program and specific grievances will occur on an annual basis. Annual M&E reports will be shared with relevant staff and teams (including Senior Director of Global Conservation Initiatives and any other parties deemed necessary by PCS) and will be stored at Pew. PCS will complete an annual assessment of the GRM system to determine how the operation is working, trends and any issues that may need to be shared with senior management (including Senior Vice President of Environment and any other parties deemed necessary by PCS).

Disclosure for GEF related activities

During the duration of GEF's support for Pew's work on the ETP (June 2024-June 2026), Pew will report grievances received and their resolutions regarding the ETP component to the project Global PMU on a case basis using the aforementioned grievance log. The Global PMU will collate and report the grievances and resolutions to the WWF-GEF Agency at a semi-annual basis, without breaking confidentiality.