



Stakeholder Response Mechanism (SRM)

Operating Procedures

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United Nations Environment Programme (UNEP) Stakeholder Response Mechanism (SRM)

Operating Procedures

1. Overview

The United Nations Environment Programme (UNEP) Stakeholder Response Mechanism (SRM) enables individuals and communities who believe they have been adversely affected by activities implemented or carried out under UNEP projects and/or other UNEP operations to submit complaints to UNEP for review of potential breaches of the [Environmental and Social Sustainability Framework \(ESSF\)](#). The ESSF is designed to protect people and the environment from potential adverse impacts of UNEP operations, ensure that concerns are heard and addressed through appropriate steps, strengthening UNEP's accountability, integrity and sustainability standards across its work. The ESSF applies to all UNEP programmes and projects, implementing partners, executing agencies, and contractors.

The SRM complements project-level grievance redress approaches.¹ Stakeholders who believe that they may have been adversely affected by UNEP project may submit their concerns (1) to project directly; (2) through the UNEP SRM, as described in these Operating Procedures; or (3) through the relevant financing partner's accountability mechanism, where applicable. For project-related concerns, stakeholders who may be adversely affected by a UNEP project are encouraged, in the first instance, to raise the matter directly with the relevant project team. However, stakeholders may use the avenue they consider most accessible, appropriate and fair in the circumstances. The availability of one mechanism does not prevent stakeholders from accessing another, subject to the applicable procedures and any necessary coordination to avoid duplication. As a standard process, UNEP project teams are required to copy the Independent Service for Stakeholder Response (ISSR) on any complaints received directly, including where the matter is clarified or resolved at the project level. This ensures that the ISSR can maintain appropriate oversight and coordination across project-related grievances, while also supporting consistent institutional record-keeping and documentation of how concerns have been addressed.

The UNEP SRM adheres to the following principles:

- Accountability: identifying potential breaches of the ESSF;
- Impartiality: facilitating a independent, fair, and timely process for resolving concerns;
- Transparency: operating in an inclusive, transparent and effective manner;
- Accessibility: ensuring free access and clear information on the mechanism; and
- Protection: safeguarding confidentiality and taking appropriate measures to prevent retaliation.

The present SRM Operating Procedures describe how to raise a concern with UNEP and how the organization receives and responds to stakeholder concerns relating to the ESSF. The Procedures apply to UNEP.

¹ In respect of project-level activities, these Operating Procedures are to be read and applied in conjunction with the UNEP Programme Manual.

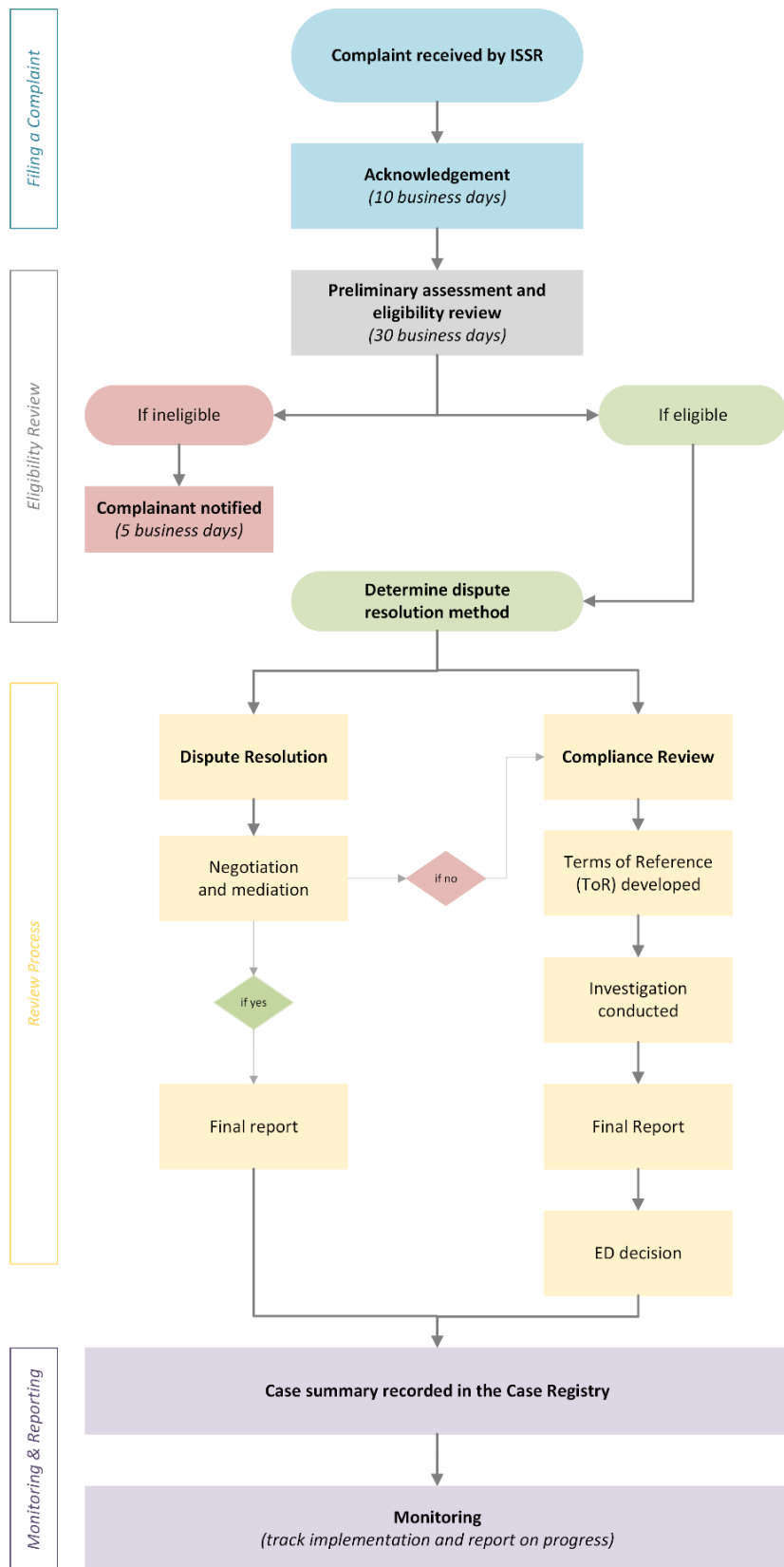
2. Purpose of the Independent Service for Stakeholder Response (ISSR)

The **Independent Service for Stakeholder Response (ISSR)** is the independent function within UNEP responsible for receiving and managing stakeholder grievances and concerns under the Stakeholder Response Mechanism (SRM). The ISSR is housed within the Executive Office, with the Chief of Staff serving as custodian of the Service and reporting directly to the Executive Director. The Executive Office does not implement or execute project activities; responsibility for project delivery rests with the relevant UNEP Divisions and Offices.

The primary function of the ISSR is to review and respond to complaints from stakeholders alleging that UNEP activities are not in compliance with UNEP's ESSF, and to provide access to appropriate grievance resolution process (see Figure 1). The ISSR undertakes the following activities:

- Receives complaints and conducts an initial eligibility screening;
- Takes appropriate protective measures to assess and minimise risks of retaliation against complainants or other participants in SRM processes;
- Supports measures to ensure that the SRM is communicated and accessible to stakeholders at no cost;
- Explains, where needed, the SRM process to potentially affected persons and other relevant stakeholders;
- Maintains a roster of independent experts and consultants who may be engaged to support compliance reviews and dispute resolution;
- Manages and oversees consultants engaged to support compliance reviews and dispute resolution processes;
- Submits reports to the Executive Director setting out findings and recommendations arising from compliance reviews, as well as the outcomes of dispute resolution processes;
- Monitors the implementation of decisions taken by the UNEP Executive Director in respect of compliance reviews and dispute resolution outcomes;
- Refers complainants to other relevant United Nations mechanisms where matters fall outside the scope of the ESSF;
- Maintains a publicly accessible SRM website and Case Registry containing summaries of cases submitted directly through the SRM and through projects.
- Maintains a digital Case Management System (CMS) for the processing, tracking, documentation and archiving of cases, in accordance with the Organization's applicable records and information management requirements.
- Reports annually to the UNEP Executive Director, including on systemic observations and advice informed by lessons learned from cases handled; and
- Reports, as appropriate and upon request, to stakeholders on the SRM implementation, subject to applicable confidentiality requirements.
- Updates policies and procedures related to stakeholder response mechanism at UNEP and rules of procedures for independent review, as required.

Figure 1. Grievance Resolution Process



3. Grievance Resolution Process

3.1. Filing a Complaint

Any stakeholder who believes that they, or others, are or may be adversely affected by an activity carried out under a UNEP projects and/or other UNEP operations may submit a complaint. Complaints may be submitted directly by affected persons or through authorised representatives. The ISSR will acknowledge receipt of the complaint to the complainant within ten (10) business days.

Complaints may be submitted by completing the complaint [form](#), available in all six official languages of the United Nations (Arabic, Chinese, English, French, Russian and Spanish) and sending it by email. Alternatively, the form may be printed, completed by hand and submitted by post.

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Complainants who have safety, confidentiality, or other concerns may file the complaint anonymously, provided they are willing to supply sufficient information to enable the ISSR to assess, investigate and seek to resolve the matter.

3.2. Eligibility Review

Within thirty (30) business days of receipt, the ISSR will review and assess the complaint to determine its eligibility and relevance to the SRM mandate. The ISSR will inform the complainant and relevant UNEP staff/personnel of its determination.

Where a complaint is found to be ineligible or outside the SRM mandate, the ISSR will within five (5) business days of the determination inform the complainant of the determination and close the case.

If the complaint is deemed eligible, the ISSR will, considering the nature of the complaint and the complainant's request, determine whether the complaint will proceed through (1) dispute resolution, or (2) compliance review (see Figure 1).

Admissibility criteria:

- The complaint relates to a UNEP-supported project that is under preparation, active, or has been operationally closed for less than two (2) years;
- The complaint is submitted by, or on behalf of, one or group of persons or community who allege they have been, or may be, adversely affected by the implementation or execution of the relevant UNEP activity in line with the UNEP ESSF.

Exclusion criteria:

- The complaint raises allegations that are not directly related to the UNEP ESSF;
- The complaint concerns a staff grievance with the organization, or a grievance by an individual relating to their pursuit of employment with the organization;

- The complaint concerns a matter previously raised and already assessed by the same complainant(s) in relation to the same issue, unless significant new information has become available or circumstances have materially changed.

Where a complaint raises allegations that are not directly related to the scope of the stakeholder response mechanism, but may warrant consideration by another oversight, inspection or investigative body (for example in the case of accusations of mismanagement or inappropriate administrative procedures), the ISSR will refer the matter to the appropriate UNEP and/or United Nations mechanism.

3.3. Review Process

3.3.1. Dispute Resolution

In all cases involving grievance, priority will be given to resolving the matter through dispute resolution, including mediation and negotiation, with a view to reaching an agreed outcome and closing the case through the effective addressing of grievance. The applicable procedures are set out in detail below.

a. Negotiation and Mediation

Within thirty (30) business days of determining that a complaint is eligible for dispute resolution, the ISSR will develop and share with the complainant(s) a proposed approach to dispute resolution. The proposal will be informed by consultations with the complainant(s) and will set out the objectives of the process, the steps to be taken, the roles and responsibilities of the participating parties, safeguards to ensure culturally appropriate, gender-responsive and non-coercive participation, measures to assess and mitigate risks of retaliation, and a proposed timeline.

As participation in dispute resolution is voluntary, the ISSR will ensure that the complainant(s) fully understand the proposed process, the options available to them and their right to decide whether to participate. The ISSR will also invite relevant UNEP personnel and other concerned parties to participate in the mediation, negotiation or other dispute resolution process, as appropriate.

Where a full or partial agreement is reached, the agreement will be documented in writing as part of the final report concluding the process. The final report will be shared with the complainant(s), relevant UNEP personnel and other concerned parties, subject to applicable confidentiality, consent and safety considerations.

b. Final Report on the Dispute Resolution

Within twenty-five (25) business days after full or partial agreement has been reached to give an end to the process, the ISSR will issue to the UNEP Executive Director a final report on the dispute resolution process. A copy will be sent to the complainant(s) together with a translation into the relevant local language where necessary and released to the public through the SRM Case Registry, subject to applicable confidentiality, consent and safety considerations.

3.3.2. Compliance Review

Where the parties are unable to resolve a grievance through dispute resolution, including

mediation or negotiation, the ISSR will initiate a compliance review in accordance with the procedure set out below.

a. Terms of Reference (ToR) for Compliance Review

Within twenty (20) business days of determining that a complaint is eligible for compliance review, the ISSR will develop draft Terms of Reference (ToR), including a proposed timeframe for its investigation.

Relevant actors, including, the complainant(s), UNEP personnel, and other interested stakeholders will be given ten (10) business days to comment on the draft ToR. After considering all comments, ISSR will issue final ToR. Amendments to the ToR during the process will be subject to similar consultation and disclosure procedures.

b. Investigations

The ISSR will either conduct the compliance review directly or engage independent experts or consultants to conduct the review in accordance with the applicable terms of reference.

The ISSR will encourage all relevant actors to cooperate fully with the compliance review and to provide timely access to relevant documents, personnel and project sites, subject to applicable confidentiality, safety and legal requirements.

For the purposes of the compliance review, the ISSR and any experts or consultant(s) engaged to support the process will have the authority and responsibility to:

- Interview persons with relevant information, including the complainants, affected stakeholders, implementing partners, and UNEP staff/personnel familiar with the project;
- Obtain and review any documents and other related evidence;
- Conduct on-site visits, where relevant.

All review activities will be conducted in a manner that safeguards confidentiality, minimises risks of retaliation, and ensures that engagement with affected stakeholders is culturally appropriate, gender-responsive and attentive to specific needs and vulnerabilities.

c. Draft Compliance Report

Upon completion of its investigation, the ISSR will prepare a draft compliance review report, including findings and recommendations, as appropriate. The complainant(s), relevant UNEP personnel and any other concerned person or entity may provide comments on the draft report within twenty (20) business days.

The compliance review report will include:

- A summary of the complaint and the issues raised;
- A description of the investigation methodology and procedural steps taken to review the issues raised in the complaint;
- Relevant factual findings, including any findings of non-compliance;
- An assessment of actual or potential harm, including any causal link between identified non-compliance and such harm;
- An assessment of whether UNEP activities complied with the “do no harm” principle under the ESSF, and whether adequate mitigation measures were implemented to

prevent, minimise or remedy adverse impacts;

- Recommendations to bring UNEP into compliance with the ESSF or otherwise mitigate harm to the complainant(s); and
- A proposed plan for monitoring the implementation of any recommended actions that UNEP may decide to take in response to the complaint.

d. Final Compliance Report and Decision by Executive Director

Within twenty-five (25) business days after the close of the period for receiving comments on the draft report, the ISSR will submit the final compliance review report to the UNEP Executive Director. A copy of the final report will also be shared with the complainant(s), together with a translation into the relevant local language where necessary, relevant UNEP staff/personnel and other concerned parties.

Within twenty-five (25) business days of receiving the final compliance review report, the UNEP Executive Director will decide what steps, if any, UNEP will take to bring the relevant activities into compliance with the ESSF and/or to mitigate any harm to the complainant(s). The final compliance review report and the Executive Director's decision will be published in the SRM Case Registry, subject to applicable confidentiality, consent and safety considerations. The Executive Director's decision is final and is not subject to appeal or further review.

3.4. Monitoring

The ISSR will include, as part of any full compliance review report, a plan for monitoring and reporting on the implementation of the final decision. The monitoring plan may be adjusted, as necessary.

The ISSR will issue, through the SRM Case Registry and subject to the consent of the complainants, a monitoring report and update the status of implementation at least annually until such time as the decision has been fully implemented.

4. Maintaining the SRM website, including the Case Registry

In coordination with the UNEP Communication Division, the ISSR maintains a publicly accessible SRM website containing information on the ESSF, the SRM and relevant procedures, including guidance on submitting complaints. The website includes a Case Registry containing final documents disclosed in accordance with these Operating Procedures.

The Case Registry records both complaints received directly by the ISSR and complaints submitted directly to UNEP project teams. As a standard process, UNEP project teams are required to copy the ISSR on any complaints received directly, including where the matter is clarified or resolved at the project level. This ensures that the ISSR can maintain appropriate oversight and coordination across project-related grievances, while also supporting consistent institutional record-keeping and documentation of how concerns have been addressed.

5. Temporary and Pre-emptive Measures

Notwithstanding the procedures set out above, where, at any stage following receipt of a complaint, the ISSR determines that there is a risk of significant, imminent or irreversible harm to the complainant(s) or other affected persons, it may recommend that the UNEP Executive Director approve appropriate interim measures pending the completion of the compliance review or dispute resolution process.

The ISSR may also initiate proceedings under these Operating Procedures where:

- a. UNEP receives information from a credible source indicating that a UNEP-funded

project or programme has caused, or may cause, adverse impacts on an individual, group or community;

- b. the information, if substantiated, would indicate a significant risk to affected persons, the environment or UNEP's reputation;
- c. the affected person(s) is unable to access the SRM directly; and
- d. the available information provides *prima facie* grounds for further review.

Any proceedings initiated under this provision will be conducted in accordance with the applicable requirements of these Operating Procedures, including those relating to confidentiality, consent and protection from retaliation.

In addition, and as required, the ISSR may recommend updates to UNEP's current safeguards policy and procedures.