

Conflict of Interest and CEPF Funding

Conservation International (CI) is committed to ensuring that its transactions, engagements, and relationships are transparent and do not inappropriately benefit interested persons and organizations.

As the administrator of the Critical Ecosystem Partnership Fund (CEPF), CI aims to ensure the same high standards are applied to all CEPF operations and funding decisions.

CEPF has transparent and globally consistent eligibility criteria and decision-making processes that are approved by the CEPF Donor Council and widely publicized. An ecosystem profile for each region is also approved by the Donor Council and clearly sets out the parameters for investment. These investments adhere to environmental and social policies of the Global Environment Facility and the World Bank, as detailed in the CEPF Operational Manual.

All grant recipients also agree to adhere to specific ethical standards pertaining to the use of CEPF funds, as detailed in the CEPF grant agreements (OM 4.4.6 and 4.4.7).

Additional measures to be put in place for CEPF operations and decisionmaking that may present an actual or apparent conflict of interest are detailed below.

A Regional Implementation Team will provide strategic leadership in each region selected for funding beginning in 2007. The objective of these teams will be to convert the plan in the CEPF ecosystem profiles into powerful portfolios of grants. The teams will provide local knowledge and insights and represent CEPF in each hotspot. They will have primary responsibility for building a broad constituency of civil society groups working across institutional and geographic boundaries toward achieving the shared conservation goals described in the profile.

Each Regional Implementation Team will be selected by the CEPF Donor Council through an approved transparent, competitive process (OM 4.3). Consideration of applications from CI will require recusal by the CI members of the CEPF Working Group and Donor Council from any aspect related to the review and approval by the Donor Council.

To avoid conflict of interest at the hotspot level, the organizations that comprise the Regional Implementation Team (whether international or local civil society groups) will not be eligible for additional grants in that hotspot. Applications from formal affiliates of those organizations that have an independent operating board of directors will be accepted, but subject to additional external review.

Decisionmaking for Project Applications

All applications for funding will be reviewed by the Regional Implementation Team, which will also manage the process for review of proposals with external reviewers and advisory committees, where relevant.

The Regional Implementation Teams will award all grants of \$20,000 and less. For grants above \$20,000, the team and local advisory committee, where relevant, as well as CEPF Secretariat staff will be involved in decisionmaking within each hotspot.

Additional external review will be required for all proposals requesting more than \$250,000. All proposed grant awards of more than \$20,000 to CI will require approval on a time-bound no objection basis by the CEPF Working Group. Consideration of applications from CI will require recusal by the CI member of the CEPF Working Group.

Complaint Mechanisms

CEPF provides a written explanation to all applicants whose proposals are unsuccessful as part of its focus on building civil society capacity. Applicants are encouraged to contact the relevant Regional Implementation Team or CEPF grant director if they have additional questions about the decision. If the applicant is not satisfied with the response, a grievance may be submitted to the CEPF Executive Director at cepfexecutive@conservation.org or by mail to the following address:

Critical Ecosystem Partnership Fund
Conservation International
Attn: Executive Director
2011 Crystal Drive
Suite 500
Arlington, VA 22202, U.S.A.

CEPF has also established specific procedures to enable local communities and other stakeholders to raise a grievance at all times to applicants, grantees, Regional Implementation Teams, and the CEPF Secretariat related to the implementation of safeguards. These are detailed in sections 3.5.1 and 3.5.2 of the CEPF Operational Manual.

In addition, the World Bank has several mechanisms available to the public. These mechanisms include the Inspection Panel and the Department of Institutional Integrity (www.worldbank.org/integrity), which investigates allegations of fraud and corruption related to World Bank Group-financed projects.